



November 24, 2022

To whom it may concern:

Re: ERO #019-6196, comments on “Proposed Changes to the Ontario Heritage Act and its regulations: Bill 23 (Schedule 6) - the Proposed More Homes Built Faster Act, 2022”

I am writing as the President of the Prince Edward County branch of the Architectural Conservancy of Ontario (ACO), a registered charity founded in 1933. ACO’s mission is “Through education and advocacy, to encourage the conservation and reuse of structures, districts and landscapes of architectural, historic and cultural significance, to inspire and benefit Ontarians.”

Our ACO branch is located in a rural part of eastern Ontario that is rich in cultural heritage. Prince Edward County’s cultural heritage is a cornerstone of our local economy and essential to our health and well being. Our branch engages with our local community to identify practical, thoughtful and creative ways to conserve the County’s built and landscape heritage. We are committed to conserving the County’s special “sense of place.” We anticipate change and work with our community to embrace, accommodate or adapt to change where appropriate; and mitigate, prevent or oppose change where there is an adverse impact.

Bill 23’s changes to the *Ontario Heritage Act* will be a giant step backward for the conservation of cultural heritage in Ontario. The negative effects of Bill 23 will be especially acute in rural municipalities, which do not have the capacity to respond to Bill 23’s requirements, and whose often humble built heritage does not always meet more than one criteria of O.Reg. 9/06.

Bill 23 will:

- limit Prince Edward County’s ability to protect existing and future properties on the Heritage Register;
- limit new listings to a 2-year period, within which time the County must designate the property or have the listing expire. Properties currently on the Heritage Register would be de-listed if not designated within 2 years of the new Act coming into force. Properties removed from the Heritage Register cannot be added again for 5 years;
- compel unnecessary designations;
- reduce the Heritage Register to a finite, time-limited, and largely development-driven, pre-designation tool, and leave hundreds of the County’s heritage properties vulnerable to demolition whether the lands are currently being developed or not;
- limit the County’s ability to state its intention to designate a property within 90 days of a development application unless it is already listed on the Heritage Register; and
- require a property to meet 2 criteria of O.Reg. 96 (instead of the current one criteria).

Our municipal government is just about to embark on a Cultural Heritage Master Plan, to strengthen the protection of our cultural heritage. The County’s heritage resources are the bedrock of our tourism economy, but they are also vulnerable to damage and destruction by development pressures. Two goals of the Cultural Heritage Master Plan are to (1) expand the Heritage Register to ensure that we have



inventoried the full extent of the County's heritage resources; and (2) identify potential cultural heritage landscapes for designation. Bill 23 will upset and set back this important work, which builds upon the foundational research undertaken for the 1984 Historical Architectural Survey of Prince Edward (HASPE) and subsequently published as *The Settler's Dream*.

Prince Edward County, like many other rural municipalities, does not have a heritage planner and has a challenge hiring regular planners. The County does not have the capacity – paid or volunteer – to go through the designation process for all the properties currently on the Heritage Register, let alone additional properties identified through the Cultural Heritage Master Plan process.

Bill 23 will undermine our efforts as a community to conserve the County's heritage resources for all Ontarians. I urge you to delete from Bill 23 all changes to the *Ontario Heritage Act*.

Sincerely,

Liz Driver, President, Prince Edward County branch of the Architectural Conservancy of Ontario

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