

November 24, 2022

Heritage Branch, Ministry of Citizenship  
and Multiculturalism  
400 University Avenue, 5th Floor  
Toronto, ON  
M7A 2R9  
Canada

**File: ERO 019-6196**

**Attention: Paula Kulpa**

Dear Paula:

**RE: Proposed Changes to the Ontario Heritage Act and its regulations: Bill 23  
(Schedule 6) - the Proposed More Homes Built Faster Act, 2022**

On behalf of the City of Barrie's Business Performance and Environmental Sustainability Department, we respectfully submit the following response to the Ministry of Citizenship and Multiculturalism Environmental Registry Posting Numbers 019-6196. The notice was posted on October 25, 2022, for a 30 day review period. City staff have undertaken a review of the proposal details and would like to provide the following comments and concerns.

The proposed changes and subsequent implications to the City's obligations under the Clean Water Act, Environmental Protection Act and Lake Simcoe Protection Act are unclear and, as such, changes may impede the City's ability to comply with its legal obligations. There are also concerns relating to the unknown risks for protecting the City's sources of drinking water, natural assets and protecting our communities from flood risk. Reducing the Conservation Authority's ability to comment on how new developments will impact environmentally sensitive areas is concerning as municipalities rely on these authority's specialized staff to assess the harmful impacts.

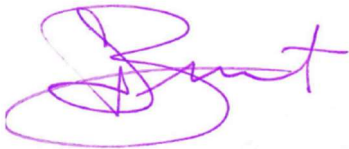
The proposed changes in Bill 23 would permit Developers to download their costs to the homeowners, tenants and municipal taxpayers. Currently, the fees that municipalities charge Developers are used to provide critical services like infrastructure, park land and social housing.

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Furthermore, the amendments to legislation resulting from Bill 23 may result in the City's inability to achieve important climate change goals, conduct development in a sustainable manner, protect the environment, and plan our own community. As an example, specifically with respect to the Ontario Heritage Act's proposed amendments, by applying restrictions, criteria, and timelines to properties viewed as having cultural heritage value or interest by a municipality, thus resulting in their removal from the registry, impacts not only the social interest of a community but also environmental and economical objectives. By preserving these buildings, unnecessary demolition and disposal is avoided and integral circular economy goals can be accomplished through adaptive reuse, harbouring innovative design and green initiatives, whilst collectively revitalizing a neighbourhood and achieving environmental benefits. As such, implementing the proposed changes may conflict with the City's obligation in influencing a Circular Economy, which is currently a Provincial priority.

Should you have any questions, please contact the undersigned at 705-739-4220 x 6140 or [Sandra.Brunet@barrie.ca](mailto:Sandra.Brunet@barrie.ca).

Kind regards,



Sandra Brunet, BSc.,  
Associate Director, Business Performance and Environmental Sustainability

cc: Bala Araniyasundaran, City of Barrie (GM of Infrastructure & Growth Management)  
Katie Thompson, City of Barrie (Risk Management Official – BPES)  
Bridget Mitchell, City of Barrie (Supervisor of Environmental Compliance – BPES)