

November 15, 2022

**TO:** Mr. Doug Ford, Premier  
Mr. Steve Clark, Minister of Municipal Affairs and Housing  
Ms. Laurie Scott, MPP, Chair – Standing Committee on Heritage, Infrastructure and Cultural Policy

**RE:** Bill 23, More Homes Built Faster Act, 2022

**RECOMMENDATION:**

1. That the Standing Committee strike out Section 6 (Amendments to Ontario Heritage Act)<sup>i</sup>

Dear Mr. Ford, Mr. Clark and Ms. Scott,

More homes need to be built faster – there is no debate about that. However, the St. Lawrence Neighbourhood Association strongly disagrees that in order to accomplish that objective, more Heritage resources must be sacrificed.

It is a long held principle of governance that decision-making is most effective when decisions are made closest to the individual places and people they affect – that it be “devolved” to as local a level as possible. This results in more effective, more innovative and more tailored policy making; policies are developed that better account for the priorities of individual cities, towns and neighbourhoods.

So it is with *Heritage Preservation* policy; the municipal level of government is the level best positioned to develop it. Yet Section 6 of the Bill removes even more of the existing autonomy of municipalities to fill this role effectively; without replacing it with stronger powers for any higher level of government to offset this loss. The inescapable conclusion: this government believes Heritage can and should be sacrificed in the interest of speed – a conclusion that the SLNA Heritage Committee strongly rejects. Accordingly, Section 6 should be struck from the Bill.

The Dominion Wheel and Foundries case illustrates how municipal autonomy is already constrained unduly. The Foundries property (153, 161, 179 &, 185 Eastern Ave, Toronto) has been listed on the City of Toronto’s heritage register since 2004 (designation was not an option since the property was provincially owned). Buildings on the property evoke an industrial heritage going back one hundred years. Yet in early 2021, as a Wikipedia post lays out:

“Infrastructure Ontario (the agency managing the property) decided to demolish the heritage buildings without first providing a Heritage Assessment Report to Toronto in accordance with the subdivision agreement, did not disclose publicly its intention to demolish the buildings, did not disclose publicly the Heritage Assessment Report written by one of its employees, and did not undertake any “public engagement” respecting the demolition of the historic buildings.”<sup>ii</sup>

Encouraged by members of City Council, the St. Lawrence Neighbourhood Association successfully turned to the courts to halt demolition. Eventually the provincial government signed onto a redevelopment plan that preserves key portions of the heritage buildings.



The St. Lawrence Neighbourhood Association (SLNA), incorporated in 1983, represents over 35,000 residents living in the St. Lawrence Neighbourhood of Toronto. The neighbourhood – bounded by Yonge St., Queen St. E., Parliament St and the rail corridor to the south is a mixed-income, ethnically diverse residential and commercial community adjoining the Central Business District. It contains the oldest neighbourhood in the (now) City of Toronto, the *original ten blocks* of the Town of York (dating from 1793) and a very large number of historically significant heritage assets – civic, provincial and federal – which the neighbourhood values highly.

The SLNA Board and the members of its Heritage Committee urge the Standing Committee on Heritage, Infrastructure and Cultural Policy to craft legislation aimed at building faster not at the expense of built Heritage. Striking out Bill 23's Section 6 is an essential first step.

Thank you for your consideration of this recommendation.

Sincerely,

Stewart Linton  
Director and President  
St. Lawrence Neighbourhood Association

Suzanne Kavanagh  
Chair, Heritage Committee  
St. Lawrence Neighbourhood Association

cc: Mayor John Tory

City Councillors:

Ausma Malik  
Chris Moise

Councillor's Staff:

Tom Davidson  
Tyler Johnson, Edward LaRusic

Members of Provincial Parliament:

Chris Glover  
Kristyn Wong Tam

Members of Parliament:

Hon. Marci Ien  
Kevin Young

SLNA Board of Directors:

Ms. V. Ilgacs	Mr. S. Linton	Ms. S. McMillan
Ms. D. Patterson	Ms. T. Tenenbaum	Ms. R. Tilson

SLNA Heritage Committee

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<sup>i</sup> While there are other provisions of Bill 23 which we believe should be struck out as well they are not discussed in this communication which focuses exclusively on heritage policy. The recommendation highlights this focus.

<sup>ii</sup> [https://en.wikipedia.org/wiki/Dominion\\_Foundry\\_Site](https://en.wikipedia.org/wiki/Dominion_Foundry_Site)