



November 23, 2022

**Re: Heritage Mississauga response to the proposed Bill 23**

To whom it may concern,

Heritage Mississauga has reviewed the Bill 23 (More Homes Built Faster Act, 2002) and the proposed changes to the *Ontario Heritage Act* and to heritage planning. In consideration of Mississauga's unique heritage context, Bill 23 presents some significant concerns and does not adequately suit the needs of our growing, evolving, and diverse population. Mississauga's cultural diversity offers both opportunities and challenges in terms of heritage conservation. The many ethnic communities that have established themselves here have enriched the city contributing cultural markers from their respective homelands. Spread throughout Mississauga, these markers include styles in architecture, cuisine, artistic expression, and many other tangible aspects of heritage strengthening the vitality and viability of Mississauga as a whole. Its dynamic character, the many historic villages, significant landscapes, and diverse cultural communities located within a modern urban setting give Mississauga a unique cultural identity that continues to unfold. In short, our city is a multifaceted, deeply varied, culturally endowed, and dynamic place to call home. Bill 23, through the proposed changes to the *Ontario Heritage Act*, undermines all of this.

Bill 23 threatens to hamper, if not dismantle, ongoing efforts to identify and preserve Mississauga's built, natural and cultural heritage. Aside from the established histories of the city, the bill will make the protection of places, humble in appearance yet associated with the stories of underrepresented communities, difficult to protect. Indigenous and Black history as well as early cultural locations associated with various ethnic and 2SLGBTQIA+ communities are at risk of disappearing. While the *Ontario Heritage Act* and existing municipal registers have often been viewed as having too great a focus on colonial era histories, Bill 23 threatens to limit our abilities to make heritage conservation and interpretation inclusive and reflective of our collective and evolving histories.

Of particular concern are the proposals in Bill 23 regarding the treatment of Listed properties on the municipal heritage register. Heritage Mississauga agrees that properties proposed for Designation under the terms of the *Ontario Heritage Act* should meet more than one of the established criteria under Regulation 9/06. However, we find it very troubling that there was no consultation with municipal heritage professionals when the bill was initially drafted. Bill 23 is a "one-size fits all approach" to development and disregards the uniqueness of Ontario's municipalities and regions in a manner that is very heavy-handed and centralized. Individual municipalities, along with residents, should determine what is valuable when it comes to telling their stories, as well as what should be preserved, so long as an established criteria is met.

Listing a property on a municipal heritage register is an important tool in the conservation and planning process. Changing this process could potentially lead to the loss of significant heritage assets and contribute to a more combative planning process overloading the Ontario Land Tribunal, both of which would slow the development and building processes significantly. As such, we firmly believe Bill 23 will both pose significant threats to our built, cultural, and natural heritage (for existing heritage properties and potential future heritage properties) and be counterproductive to its stated purpose of efficiently increasing the province's housing stock.

While we do not oppose the 2-year limit for Listed properties to be maintained on the municipal heritage register, we do request that properties already listed be grandfathered into the new legislation to allow for a longer window of time to assess and determine what may be eligible for Designation, and also to review what may be let go. The review task is enormous, and it would be egregious to not be able to review existing lists properly with due diligence.

We insist that this, and potential future legislation, not reopen the status of currently Designated properties and existing Heritage Conservation Districts. Municipalities and their residents have already determined that these are worthy of conservation and protection and do not want the provincial government to usurp the ability of communities to preserve their own culture, stories, built heritage and identity.

Yes, changes are required within the existing processes, and there is absolute value in shortening the approval process and reducing administrative redundancy with respect to development application and building permits. It behooves us to collectively review, and reconsider established legislation from time to time to meet our evolving needs and circumstances. But Bill 23 is not the way to accomplish this. Streamlining the process should not preclude considering matters of overriding social import - including built, cultural, and natural heritage.

We are calling for open and honest consultation to achieve an amenable solution. After all, no one knows Ontario's communities, and what is important to them, better than those who live and work there. To that end, Bill 23 should be withdrawn to allow greater dialogue and time to address issues impacting our built, cultural, and natural heritage. We cannot ever go back and retrieve these valuable assets once they have been lost – both in terms of tangible and intangible heritage values. Our heritage is, in a very real sense, a non-renewable resource. Collectively as custodians of the future we leave to the next generation we should always seek to walk carefully and respectfully, especially if we hope to grow, evolve, and move forward.

On behalf of Heritage Mississauga,

Douglas Hancock, President