

**BILD**

BUILDING A GREATER GTA
Building Industry and Land
Development Association

September 6, 2017

Chair David Shiner and members of the Planning and Growth Management Committee
City of Toronto
100 Queen Street West
Toronto, ON
M5H 2N2
c/o Toronto City Clerks

Dear Chair Shiner,

**RE: September 7th Planning and Growth Management Committee Meeting,
Agenda Item PG22.5 Inclusion on the City of Toronto's Heritage Register - Midtown in Focus -
Phase 1: Main Street Properties**

With more than 1,450 member-companies, the BILD is the voice of the land development, home building and professional renovation industry in the Greater Toronto Area and Simcoe County. Our industry is essential to the City of Toronto's long-term economic strength and prosperity. In 2016 alone, the residential construction industry in Toronto generated over 68,000 on-site and off-site jobs in new home building, renovation and repair – one of the City's largest employers. These jobs paid \$4 billion in wages and contributed \$11.5 billion in investment value to the local economy.

On behalf of the Toronto Chapter members of the Building Industry and Land Development Association (BILD), we would like to take this opportunity to comment on the proposed inclusion of 258 commercial "Main Street" properties on the City's Heritage Register and the proposed "batch-listing" approach, as noted in the September 7th Planning and Growth Management Committee meeting agenda.

Firstly, it is imperative to note that BILD Toronto Chapter is in support of the Toronto Preservation Board's mandate to designate heritage properties or conservation districts and include properties on the inventory of heritage properties, among other duties. BILD Toronto Chapter and its members do not want to see heritage buildings demolished.

According to the City's Staff report entitled "Status Update: Heritage Register and City-Wide Heritage Survey," dated August 22, 2017, as of March 1, 2017 the total number of properties identified with heritage potential and subject to further evaluation was 1,250 properties. We are deeply perplexed as to why the listed properties in the midtown in Focus area were made a priority over the historic backlog of properties. BILD Toronto Chapter is also concerned by this overly aggressive approach to batch list properties, especially as some of the properties have very questionable heritage significance. This is problematic from the industry's perspective. We are supportive of the timely listing of properties when undertaking local area studies for heritage properties that are of significance. However, we are very concerned with the blanket approach to "batch-listings" proposed within the report. We do not believe this is a reasonable solution.

As first stated in our August 23rd letter to the Toronto Preservation Board, the City's own report acknowledges that this large number of properties being added to the Heritage Register at one time is unprecedented. Change of this magnitude should always trigger an industry consultation meeting. City staff failed to consult or even notify the 258 property owners.

We also believe that this is a clear departure from using a Heritage Conservation District approach to a large group of properties within a given geographical area of the City, with little to no planning rationale for this change in approach. BILD members believe that this is a fundamental manipulation of the process to include

second-class properties. If everything is listed, nothing is valuable. Our members believe that this approach is an anti-development ploy, and as such deeply concerning.

For the reasons noted above, we kindly request:

1. That the Planning and Growth Management Committee not adopt the staff recommendations of this report.
2. That Heritage Staff meet with BILD Toronto Chapter members in consultation for the proposed Batch Listing Approach, and provide a clear rationale as to why this approach is being utilized over a Heritage Conservation District.
3. That BILD receives notice on any updates to this proposal and any associated reports of this nature in the future.
4. That the Planning and Growth Management Committee direct City Staff to notify landowners when the nature of their property is proposed to be changed.

We thank you for considering these thoughts and should you have any questions or concerns, please feel free to contact the undersigned.

Sincerely

A handwritten signature in blue ink, appearing to read 'Danielle Chin'.

Danielle Chin, MCIP, RPP
Senior Manager, Policy & Government Relations BILD

ATTACHMENT 1: BILD LETTER TO THE AUGUST 24th TORONTO PRESERVATION BOARD

August 23, 2017

Chair Jennifer Rieger and members of the Toronto Preservation Board
100 Queen Street West
Toronto, ON
M5H 2N2
c/o Toronto City Clerks

Dear Chair Rieger,

RE: August 24th Toronto Preservation Board Meeting, Agenda Item: PB25.8 Inclusion on the City of Toronto's Heritage Register - Midtown in Focus - Phase 01: Main Street Properties

With more than 1,450 member-companies, the BILD is the voice of the land development, home building and professional renovation industry in the Greater Toronto Area and Simcoe County. Our industry is essential to the City of Toronto's long-term economic strength and prosperity. In 2016 alone, the residential construction industry in Toronto generated over 68,000 on-site and off-site jobs in new home building, renovation and repair – one of the City's largest employers. These jobs paid \$4 billion in wages and contributed \$11.5 billion in investment value to the local economy.

On behalf of the Toronto Chapter members of the Building Industry and Land Development Association (BILD), we would like to take this opportunity to comment on the proposed inclusion of 258 commercial "Main Street" properties on the City's Heritage Register.

BILD and its members were surprised by this proposal. It presents a new approach to listing properties, and yet we did not receive any notice for this report. It was especially surprising given the large volume of properties that are proposed to be listed on the registry. BILD has also been advised by a few of its members that they did not receive notice for this proposal and they have properties that are proposed to be added to the list. As industry stakeholders and affected property owners, we believe that sufficient notice has not been provided.

The City's own report acknowledges that this large number of properties being added to the Heritage Register at one time is unprecedented. Change of this magnitude should always trigger an industry consultation meeting. Given the sheer volume of properties that are proposed to be listed on the City's Heritage Registry, we would like to request a formal consultation meeting. Since this is also a pilot project that will set future expectations for the registry, it is imperative that the City consult with the industry prior to the adoption of the report.

For the reasons noted above, we kindly request:

- 5. That the Toronto Preservation Board not adopt the staff recommendations of this report at its August 24th meeting, to allow time for appropriate notification and consultation.**
- 6. That the Toronto Preservation Board direct City Staff to meet with BILD members in consultation for this proposal.**
- 7. That BILD receives notice on any updates to this proposal and any associated reports of this nature in the future.**

We thank you for considering these thoughts and should you have any questions or concerns, please feel free to contact the undersigned.

Sincerely



Danielle Chin, MCIP, RPP
Senior Manager, Policy & Government Relations BILD