



May 8, 2024

Chair Perks and Members of the Planning and Housing Committee  
City Hall - 100 Queen Street West  
Toronto, ON  
M5H 2N2

Sent via email to: [phc@toronto.ca](mailto:phc@toronto.ca)

**RE: PH12.2 - Recommended Official Plan Amendment respecting Schedule 3 Complete Application Requirements, Chapter 3 Cultural Heritage Evaluation Report and Municipal Code Amendments respecting Delegated Authority for Minor Zoning By-laws**

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Dear Chair Perks and Members of the Planning and Housing Committee,

The Building Industry and Land Development Association (BILD) is in receipt of the aforementioned staff report, which is to be considered by the Planning and Housing Committee on May 9, 2024, followed by City Council on May 22, 2024, subject to the actions of the Planning and Housing Committee. We offer you the following comments with respect to this report.

We acknowledge that this report recommends amendments to Schedule 3 of the City of Toronto Official Plan, related to complete application requirements, and that the recommended Official Plan Amendment (OPA 720) is intended to clarify and streamline complete application requirements, enabling submission of complete applications, timely application review, and decision-making and approval.

While the contents of OPA 720 are generally acceptable, there is one notable concern with the update to Section 3.1.6, Heritage Conservation, detailing a new requirement for a Cultural Heritage Evaluation Report (CHER). If approved, the Cultural Heritage Evaluation Report requirement will be added to Schedule 3 of the Official Plan.

The report stipulates that, if adopted, a CHER would be required for properties that have been identified by City Council through a City-led study as having potential cultural heritage value or interest, but which are not included on the Heritage Register. A CHER would also be required for properties that have been previously identified by City Council as having cultural heritage value or interest and require further evaluation, but which are not currently included on the Heritage Register. Properties meeting one or more of these criteria will be compiled into a single accessible source which will be made available to the public on the City of Toronto website.

BILD has concerns with the CHER requirement as it seemingly creates a new up-front process to Heritage Conservation, Protection and Preservation beyond the Ontario Heritage Act and O. Reg. 9/06 and in addition to what the City of Toronto currently does as a part of its heritage protocol of 'listing' and 'registering' heritage properties.

BILD does not believe the CHER requirement is appropriate, necessary and would only serve to add an additional hurdle to planning applications. Furthermore, this proposal is counter-intuitive to the goals and objectives of the City to speed up approvals, reduce red tape and build more housing supply.

**We recommend that the Planning and Housing Committee remove the CHER requirement from OPA 720 and allow time for City Staff to consult with the Industry.**



We thank you for the opportunity to submit these comments and for your consideration of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Danielle Binder".

Danielle Binder, RPP MCIP  
Senior Director, Policy and Advocacy, BILD

CC: BILD Toronto Members  
Kerri Voumvakis, Interim Chief Planner  
Valesa Faria, Executive Director, Development Review  
Jennifer Chan, Office of the Mayor