

## CITY OF HAMILTON PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT Planning Division

то:	Chair and Members Planning Committee
COMMITTEE DATE:	February 5, 2019
SUBJECT/REPORT NO:	Bill 66 - Restoring Ontario's Competitiveness Act, 2018 (Schedule 10) (PED19027) (City Wide)
WARD(S) AFFECTED:	City Wide
PREPARED BY:	Heather Travis (905) 546-2424 Ext. 4168
SUBMITTED BY:	Jason Thorne General Manager Planning and Economic Development Department
SIGNATURE:	

#### RECOMMENDATION

- (a) That the City of Hamilton does not find that the proposed open-for-business planning by-law as established by the Province in *Bill 66* is a necessary tool for the following reasons, as identified in Appendices "A" and "B" to Report PED19027:
  - (i) The City has designated and zoned industrial land available for development.
  - (ii) The City has a streamlined development approvals process.
  - (iii) The proposed by-law could have impacts on employment land values and the City's transportation and infrastructure investments by creating uncertainty as a result of unplanned development.
  - (iv) There is a concern that the proposed by-law under *Bill 66*, which does not contain precise language on its purpose, could potentially be utilized for purposes beyond major employment development, which could undermine the City's planned urban structure and responsible growth strategy.
- (b) That the City of Hamilton recommends that, as an alternative to the proposed open-for-business planning by-law as established by the Province in *Bill 66*, the Province amend Section 47 of the *Planning Act* to remove the allowance for appeal of a Minister's Zoning Order.

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- (c) That should the Province move forward with the passage of *Bill 66*, the City of Hamilton has the following suggestions for improvement to the proposed legislation:
  - (i) Remove the exemptions to Subsection 3(5) and Section 24 of the *Planning Act*, Section 39 of the *Clean Water Act*, Section 20 of the *Great Lakes Protection Act*, Section 7 of the *Greenbelt Act*, and the exemption to "any prescribed provision".
  - (ii) Include the prescribed purpose of the proposed open-for-business planning by-law in section 34.1(5) of the draft Bill to restrict the prescribed purpose to major employment uses only.
  - (iii) Prior to passage of the proposed legislation, provide additional information on the prescribed information and prescribed criteria which must accompany a request to use an open-for-business by-law, which is currently referenced in the draft Regulation but without details.
- (d) That the City of Hamilton requests that, when the Province proposes new regulations, the full text be provided to allow for meaningful review and comment.
- (e) That Report PED19027 be forwarded to the Province. This Report, including Appendices "A" and "B" to Report PED19027, is considered the City of Hamilton's formal comments on ERO Postings 013-4125, 013-4239, and 013-4293.

## EXECUTIVE SUMMARY

On December 6, 2018, *Bill 66, Restoring Ontario's Competitiveness Act, 2018*, received first reading. The Bill and associated Regulation have been posted on the Environmental Registry of Ontario (ERO) for comment. Among the changes included in *Bill 66* are amendments to the *Planning Act* (Schedule 10) to introduce a new planning tool – the "open-for-business planning by-law". The stated purpose of the legislation is to provide municipalities with an economic development tool allowing municipalities to act quickly to attract new major employment opportunities. Staff have reviewed the proposed legislation and have a number of concerns, including a lack of need for the tool in Hamilton, potential unintended consequences from the tool, concern over potential impacts arising from exemptions to the *Greenbelt Act* and *Clean Water Act*, a lack of information on the proposed Regulation and prescribed purpose, and general questions on implementation. Staff's concerns have been forwarded to the Province (Appendices "A" and "B" to Report PED19027) in response to the ERO postings and the January 20, 2019 deadline for comments.

### Alternatives for Consideration – See Page 13

## FINANCIAL – STAFFING – LEGAL IMPLICATIONS

Financial: N/A

Staffing: N/A

Legal: N/A

### HISTORICAL BACKGROUND

On December 6, 2018, *Bill 66, Restoring Ontario's Competitiveness Act, 2018*, received first reading. *Bill 66* includes amendments to a number of different acts. This Report will focus on the proposed amendments to the *Planning Act* as related to the 'open-for-business planning by-law'. The Bill has been posted for comment on the Environmental Registry of Ontario (ERO #013-4293) until January 20, 2019. Details on the changes proposed through *Bill 66* are summarized in the Analysis and Rationale for Recommendation Section of this Report.

The Province also released two additional related notices for comment: the proposed "open-for-business planning tool" (ERO #013-4125) and the proposed Regulation under the *Planning Act* to facilitate implementation of the open-for-business planning by-law (ERO #013-4239). It is noted that the actual draft Regulation was not released, only a general description of what may be included in the final Regulation. The limited information provided on the draft Regulation is summarized in the Analysis and Rationale for Recommendation Section.

City staff have prepared and submitted comments to the Province in response to the ERO postings in order to meet the deadline of January 20, 2019, attached as Appendices "A" and "B" to Report PED19027. The Council decision on this Report, including any changes requested by Council, will be forwarded to the Province as additional comments, as per Recommendation (e).

This Report will provide an overview of the proposed legislative changes and a summary of staff's comments and concerns.

### POLICY IMPLICATIONS AND LEGISLATED REQUIREMENTS

The following pieces of legislation, amongst others, are impacted by the changes proposed through *Bill 66:* 

### Planning Act Amendments and Additional Regulation

The *Planning Act*, which establishes the provincial planning framework in Ontario, is one of the Acts amended through *Bill 66* (Schedule 10). In particular, *Bill 66* proposes

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to add a new section 34.1 'open-for-business planning by-law' to the Act. Section 34.1 provides direction on a number of matters, including approval and usage of the by-law, conditions to be applied, notification requirements etc. The section also identifies a number of provisions which will not apply to an open-for-business by-law, including several sections of the *Planning Act* (provincial policy statement, public works, zoning including consultation procedures, holding provisions, and bonusing), a number of other Acts (relevant Acts outlined below), and "any prescribed provision" (which is very broad and could allow any regulation to be overridden by this planning tool).

A new Regulation is also proposed under the *Planning Act* to implement the open-forbusiness planning by-law, which would be expected to provide details related to the usage and implementation of the by-law. However, the ERO notice lacks detail as the text of the actual Regulation was not released. This concern will be discussed further in the Analysis and Rationale for Recommendation section of the Report.

## Provincial Policy Statement (PPS)

The PPS provides policy direction on matters of provincial interest related to land use planning and development, and addresses such matters as efficiency of land use, housing, employment, infrastructure, natural heritage and agricultural protection, cultural heritage and archaeology, and natural and human-made hazards. The *Planning Act* (Section 3(5)) requires that all municipal land use decisions affecting planning matters be consistent with the PPS. For example, an application to amend an Official Plan or Zoning By-law may only be approved if it is consistent with the PPS.

If enacted as currently drafted, *Bill 66* would exempt an open-for-business planning bylaw from the requirement to be consistent with the PPS, as Section 3(5) of the *Planning Act* would not apply.

### Greenbelt Act, 2005

The *Greenbelt Act, 2005*, established the Greenbelt area and the Greenbelt Plan, with the goal of providing permanent protection to the agricultural land base and ecological and hydrological features of the landscape. Section 7 of the Act states that all municipal land use planning decisions must conform to the Greenbelt Plan.

If enacted as currently drafted, *Bill 66* would exempt an open-for-business planning bylaw from the requirement to conform to the Greenbelt Plan, as Section 7 of the *Greenbelt Act* would not apply.

### Clean Water Act, 2006

The *Clean Water Act, 2006*, was enacted to protect existing and future sources of drinking water, and established the framework for the creation of Sourcewater Protection Plans. Section 39 of the Act states that all municipal land use planning

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decisions shall conform with significant threat policies and designated Great Lakes policies set out in the source protection plan and have regard for other policies set out in the source protection plan.

If enacted as currently drafted, *Bill 66* would exempt an open-for-business planning bylaw from the above requirements, as Section 39 of the *Clean Water Act* would not apply.

### Places to Grow Act, 2005

The *Places to Grow Act, 2005*, provides the basis for the establishment of the Places to Grow Plan – the Growth Plan for the Greater Golden Horseshoe. The Growth Plan provides policy direction on matters related to intensification, greenfield development, transit areas, housing, employment and infrastructure. Section 14(1) of the Act states that all municipal land use planning decisions must conform to the Growth Plan.

If enacted as currently drafted, *Bill 66* would exempt an open-for-business planning bylaw from the requirement to conform to the Growth Plan, as Section 14(1) of the *Places to Grow Act* would not apply.

### Urban and Rural Hamilton Official Plans

The City's Urban and Rural Hamilton Official Plans provide the land use planning framework to guide the growth and development of the City for the next 30 years. The Urban Hamilton Official Plan (UHOP) identifies the City's urban boundary, differentiating between Hamilton's urban and rural area. The UHOP applies to all lands in urban Hamilton, and establishes the City's nodes and corridors urban structure. Land use designations are identified on Schedule E-1 to the UHOP. The Rural Hamilton Official Plan (RHOP) applies to all lands in Rural Hamilton, and applies land use designations on Schedule D. The designations include rural and agricultural designations, open space, and rural settlement areas. Supporting policies address important matters related to each land use designation, housing, urban design, cultural and natural heritage, community facilities, health and safety, transportation and infrastructure.

Chapter F of both Plans provides policies on Implementation, including direction that all municipal by-laws, including Zoning By-laws, must conform to the UHOP/RHOP. Smaller area plans, including Secondary Plans (urban) and Rural Settlement Area Plans (Rural) are found in Volume 2 to both the UHOP and RHOP.

If enacted as currently drafted, *Bill 66* would exempt an open-for-business planning bylaw from the requirement to conform to the UHOP and RHOP, as Section (24) of the *Planning Act* (which requires municipal by-laws to conform to the Official Plan) would not apply.

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## City of Hamilton Zoning By-law

The City is in the process of updating and consolidating its Zoning by-laws into one new Zoning By-law for the City of Hamilton, thereby replacing the by-laws of the former municipalities. Hamilton Zoning By-law 05-200 includes zones for all land use designations except residential, which is currently in progress and expected for completion in late 2019.

The Zoning By-law is the tool to implement the Official Plan, and identifies permitted uses and regulations (eg. height, setbacks, gross floor area, parking etc) for each zone / use. The *Planning Act* outlines the rules for establishing and amending a zoning by-law (including public consultation and appeal rights) in Section 34.

If enacted as currently drafted, *Bill 66* exempts an open-for-business planning by-law from the majority of the normal requirements applicable to a zoning by-law under section 34 of the *Planning Act*, and instead creates new provisions under section 34.1. The new provisions remove the requirement for public notification and appeal for an open-for-business by-law.

It is not clear at the present time how an open-for-business planning by-law would be implemented by the City and how it would fit within the structure of the City's Zoning By-law. These details would usually be prescribed in the regulations.

## **RELEVANT CONSULTATION**

The following Departments were consulted in the preparation of this Report:

**Legal Services Division** provided comments and interpretation on the draft legislation, incorporated herein

**Hamilton Water, Public Works Department** provided comments on the proposed legislation, in particular relation to the exemption from the requirement for the open-forbusiness planning by-law to conform to the *Clean Water Act*. Hamilton Water note that the Canadian Environmental Law Association has provided comments on this matter and indicated that the exemption from section 39 of the *Clean Water Act* is particularly risk-laden.

## ANALYSIS AND RATIONALE FOR RECOMMENDATION

The purpose of this Section is to provide an overview of the proposed legislative changes, followed by a summary of staff's comments and concerns on the proposals. The staff comments in this section are echoed in the letters attached as Appendices "A" and "B" to Report PED19027 which were submitted to the ERO in advance of the January 20, 2019 deadline.

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## **1.0 Overview of Proposed Legislative Changes**

The changes to the *Planning Act* under *Bill 66* add a new section to the Act (section 34.1), the open-for-business planning by-law. The legislation allows for an open-for-business planning by-law to be passed by a local municipality if the municipality chooses to use the tool. Municipalities are <u>not required</u> to pass such a by-law. The open-for-business planning by-law:

- Must receive approval of the Minister (Municipal Affairs and Housing). A municipality's request for approval must include 'prescribed information', which is not identified in the draft Bill;
- Shall only be authorized for a 'prescribed purpose', which is not identified in the draft Bill;
- Would allow a municipality to establish specialized zoning that does not need to comply with the Official Plan;
- Would not need to be consistent with the Provincial Policy Statement and would not be subject to sections of a number of Provincial Plans, including the *Greenbelt Act*, *Clean Water Act*, and *Places to Grow Act*.
- Would not require public consultation prior to passage (though a municipality may choose to consult the public);
- Would not be subject to Site Plan Control, though a municipality may impose conditions of approval which are similar to conditions applied through Site Plan Control; and,
- Would not be subject to appeal under the Local Planning Appeal Tribunal.

The City's ERO comments on the draft *Bill 66* are included as Appendix "A" to Report PED19027, and summarized in section 2.0 below.

The Province also released a notice regarding a proposed Regulation under the *Planning Act* to facilitate implementation of the open-for-business planning by-law. It must be noted that the actual draft Regulation was not released, only a general description of what may be included in the final Regulation. The lack of information on the text of the actual Regulation is concerning as key pieces of information are not available for review and comment.

The notice on the Regulation does provide some additional details about the purpose and application of the new tool:

• The tool would be available to all local municipalities, if certain prescribed criteria are met, to ensure the municipality can act quickly to attract employment opportunities (the 'prescribed criteria' has not been indicated);

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- Certain information would need to accompany a request by a municipality to use the by-law, including site and land use planning information and details about the proposed employment opportunity; and,
- The municipality must provide confirmation that the proposal is for a new major employment use which would meet a minimum job creation threshold of 100 jobs for municipalities with a population of more than 250,000 people.

These criteria are contained only in the draft ERO notice. As noted, no actual Regulation has been released, and therefore it cannot be confirmed if these criteria are actual requirements, or what other criteria may be added.

The City's comments on the draft Regulation are included as Appendix "B" to Report PED19027, and summarized in section 2.0 below.

## 2.0 Comments / Concerns on Proposed Legislation

Staff's comments and concerns related to the proposed open-for-business planning legislation are as follows:

1. Open-for-business planning by-law is not a necessary tool:

Staff note that the stated purpose of the open-for-business planning by-law is to provide municipalities with a tool to remove planning barriers and streamline approvals processes. Further, the ERO Notice for Bill 66 states that the changes to the *Planning Act* are intended to "speed up approvals by about 2 years". Staff First, the City of Hamilton has already question the validity of this statement. implemented measures to streamline the development approvals process. The City has zoned significant amounts of employment land in the City's Business Parks with up-to-date zoning (2010). A business wishing to locate in these areas should not require a zoning amendment and could proceed straight to site plan control. If an amendment is required, the City has a streamlined development approvals process with zoning amendment applications being approved in under one year, on average. Approval of site plan control applications is a streamlined process with a front-ended conditional approval. Therefore, staff do not see a significant value to the proposed by-law as the City's approval process for new industrial development occurs in a timely manner.

Second, while the purpose of the Bill is to streamline approvals, staff note that there are a number of other provincial requirements that are a normal part of the land use planning approvals process, and which can be quite onerous and time consuming, but were not exempted as part of the open-for-business legislation. Some examples include Ministry of Environment Environmental Compliance Approvals, Ministry of Transportation land use permits, Ministry of Culture archaeological clearances, and Ministry of Natural Resources Species at Risk

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requirements. Staff note that it is often these provincial requirements that delay the issuance of site plan approval and / or building permit issuance, and that *Bill 66* does not address these issues.

Based on the above, it is the opinion of staff that the open-for-business planning by-law is an unnecessary tool, and that, as drafted, it will not fulfil its intended purpose.

2. Potential impacts on employment land values and City's infrastructure and transportation investments:

Staff have a concern about potential unintended consequences of the open-forbusiness planning by-law, and the impact on the City's employment land market and urban structure. Allowing major employment development to locate in areas that are not designated and planned for such uses, either in Hamilton or in a surrounding municipality, could have an impact on the future viability and economic development potential of the City's already-designated business parks. The City's urban structure is founded on directing employment uses to the City's business parks, which are located in strategic locations with multi-modal access, separation from residential and sensitive uses, and proper servicing. It is good planning to encourage development areas. This approach is encouraged by the Province in the Growth Plan, which encourages intensification of employment areas, and represents efficient use of land and infrastructure. Allowing major employment uses in other non-designated and non-zoned areas could undermine this planning goal.

Further, there could be an unintended impact on the real estate market and the City's investment in transportation and infrastructure (i.e. development charges). The legislation has the potential to create uncertainty of land value resulting from the ability to locate employment uses in non-designated areas, which could result in a slowing of investment overall, not only in Hamilton but also other Greater Golden Horseshoe municipalities.

3. Need for clarity on the "prescribed purpose" identified in *Bill* 66:

Proposed section 34.1(5) of *Bill 66* states "An open-for-business planning by-law shall not authorize the use of land, buildings or structures except for a prescribed purpose". The use of the language 'prescribed purpose' is not specific, and therefore concerning. While the associated notices for the 'open-for-business planning tool' and the proposed Regulation refer to the proposed by-law being utilized to assist municipalities with attracting major employment and economic growth opportunities, the language in the Bill is vague and refers only to a 'prescribed purpose'. Staff are concerned that the language could allow for the by-

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law to be utilized for other purposes, beyond employment and economic development opportunities, in the future. For example, there has been a suggestion that the by-law could also be used for institutional uses. Further, staff note that one of the *Planning Act* sections exempted in the proposed Bill is Section 37 (bonusing) which raises the question as to future usage of the open-for-business by-law for residential development. Staff suggest adding clarity to the language in the Bill, under section 34.1(5), to state that the prescribed purpose is for major employment uses only.

4. Concerns regarding exemptions identified in subsection 34.1(6) of Schedule 10 to *Bill 66 (Planning Act* changes):

Staff have concerns over the exemptions cited in the draft Bill which identify certain sections of several Acts which do not apply to an open-for-business planning by-law. The exemptions of concern include:

• Greenbelt Act, Clean Water Act, and Great Lakes Protection Act: The exempted sections of these Acts state that any decision made under the *Planning Act* must conform to the Act in question. The effect of these exemptions therefore is to permit development which does not conform to the Acts. Staff have several concerns in this regard. First, although the option to pass the open-for-business by-law is at the discretion of the municipality, there is a concern that allowing for this option in the legislation will create significant pressure on municipal councils to permit development in areas that would normally be protected under provincial legislation.

Second, staff question the rationale for exempting development from these acts for the purpose of promoting economic development. The provincial planning framework identifies the protection of natural areas, water resources, agricultural/rural lands, and public health and safety as priorities. Further, the planning framework lays out a clear methodology for the consideration of new urban development in the rural area, which includes the requirement to undertake an exhaustive municipal comprehensive review to ensure all impacts are understood and mitigated to the greatest extent possible. Staff suggest that the inclusion of these exemptions could undermine protections for valuable areas identified as provincial and local priorities.

Third, staff have a concern that the inclusion of these exemptions may have the impact of 'incentivizing' development in the Greenbelt Plan area, among others. Staff understand that the rationale behind the enactment of this Bill is to allow for more expedient approvals of new major employment uses. Staff raise a concern that *Bill 66* may encourage development in these areas to save time and money on the development process and to take advantage of lower land costs outside of approved urban areas.

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The decision on whether or not to utilize the open-for-business by-law rests with the local municipality. If the City of Hamilton chooses not to utilize the tool, other surrounding municipalities may choose to do so, and the concerns around impacts on natural areas, water resources and rural lands would remain valid.

• Section 3(5) and Section 24 of the *Planning Act*. These exemptions have the effect of permitting development that is not consistent with the Provincial Policy Statement (PPS) and does not conform to the Official Plan. By permitting development that is not consistent with the PPS, it is not clear how the City can ensure that the provincial interest is being met in the decision on a proposed development.

Further, Staff have concerns with allowing development which does not conform to the Official Plan. The City's Urban and Rural Hamilton Official Plans provide the land use planning framework to guide the growth and development of the City for the next 30 years. The groundwork for the UHOP and RHOP is the City's comprehensive growth management strategy (GRIDS) which identified the City's nodes and corridors urban structure, as well as future growth areas for the next 30 years. The Plans are built around principles of intensification, efficiency of land use, concentration of employment uses in designated areas, protection of natural areas and agricultural lands. Allowing new development to proceed which does not conform to the Plans not only undermines the planned urban structure, but staff view it as a slippery slope to opening the door to additional unplanned development.

- Exemption from "Any prescribed provision": this language is very broad, and could allow the Minister the ability to override any law for any reason. Related to the comment in number 3 above about the lack of clarity of the prescribed purpose of the open-for-business planning by-law, this broad language raises a concern about the future use of the by-law for purposes other than major employment development.
- 5. Requirement for more information on proposed Regulation:

The ERO Notice provides a brief description of the proposed Regulation under the *Planning Act* which will facilitate implementation of the proposed 'open-forbusiness planning by-law'. However, details of the Regulation have not been provided. To provide informed comments on the Regulation and the related *Bill* 66, municipalities should be provided with greater clarify on the content of the proposed Regulation. This concern relates directly to the comment regarding the vague language utilized in *Bill* 66 as related to 'prescribed purpose' of the

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legislation. The lack of detail and specificity in both the Regulation and the Bill is concerning.

Specific areas of concern related to the Regulation are:

- "Prescribed criteria" the Notice states "The tool would be available to all local municipalities, if certain prescribed criteria are met ..." What is the prescribed criteria that municipalities must meet to request the usage of the by-law?
- "Prescribed information" the Notice states "A municipality's request to use an open-for-business planning by-law would need to be accompanied by information that would be prescribed in a proposed new regulation..." The notice goes on to provide examples, but a definitive list should be provided.

It is common practice for the details of a proposed Regulation to be released after the proposal is final. City staff suggest that this practice does not allow for the offering of complete comments. Staff further suggest that any time a Regulation is proposed under the *Planning Act*, the full text of the Regulation should be released for comment on the ERO, rather than a general description.

6. Questions on process and implementation:

There are several process questions surrounding the implementation of the openfor-business planning by-law that are unclear. These questions include:

- How and when are conditions imposed? The draft Bill indicates that Section 41 (Site Plan Control) does not apply to lands subject to an open-for-business by-law. However, municipalities may impose conditions which would normally be imposed through the approval of a site plan control application. In the absence of a site plan approval, how will the conditions be imposed and enforced? To apply the appropriate conditions, plans and studies will need to be circulated to Departments and Agencies for comment, as per the normal course of a site plan control application. Staff question the rationale for exempting section 41 site plan approval, as the timing involved in circulation, application of conditions, and clearance of conditions will be the same process and timing as site plan approval. Further, can the municipality require an undertaking agreement to be signed, and holding of securities?
- What is the timing for ministerial approval? Will there be a prescribed time period within which the minister must provide written approval to pass a by-law?
- How will a municipality implement the open-for-business planning by-law? Staff have questions about how such a by-law would be implemented and how it would fit within the structure of the City's existing Zoning By-law. Further, will a staff report be required to support the passage of the by-law? The

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Report would slow the process, which seems contrary to the purpose of the Bill.

- Staff require clarification regarding how the open-for-business by-law would be applied – would it be applied on a site specific basis only, or could it be applied to a larger area where a municipality is seeking to promote economic development? The implications of applying the by-law broadly to a larger area could result in pressures on the municipality to pre-approve areas for development which are not currently identified for such in the City's Official Plan (eg. rural and agricultural lands). This action would threaten to undermine the structure of the City's Official Plans and the City's fiscally responsible growth strategy.
- There is a concern that the language in Bill 66 is vague, and that the open-forbusiness planning by-law could be utilized for purposes other than the stated purpose (major employment uses). As noted above, the language in the draft Bill should be clarified to be specific about the purpose of the by-law. Further, if there is an intention to allow the tool to be used for other uses, this should be explained and be transparent in the draft Bill and Regulation so that the City can properly provide comment.

## 3.0 Suggested Alternative – Minister's Zoning Order (MZO)

If the goal of the Province is to expedite the approval of major employment uses, staff suggest that a more appropriate tool would be to amend the *Planning Act* to remove the allowance for appeal of a Minister's Zoning Order. The MZO is a tool under section 47 of the *Planning Act* which allows the Minister to impose zoning on a property outside of the municipal approval process. This is a rarely used tool, but because it does not require consultation with the public or municipality, it can be passed expediently by the Minister. Currently it is subject to appeal. If the Minister wishes to expedite new employment development, the MZO tool would allow this development to occur and removing the appeal rights would ensure it occurs in timely fashion. Utilizing this option removes the onus from the municipality of having to undermine its own planning framework, and removes the pressure being put on municipal councils to allow development in locations not deemed appropriate.

## ALTERNATIVES FOR CONSIDERATION

If Council directs, the City could send amended comments on the proposed legislation to the Province.

## ALIGNMENT TO THE 2016 – 2025 STRATEGIC PLAN

## **Economic Prosperity and Growth**

Hamilton has a prosperous and diverse local economy where people have opportunities to grow and develop.

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## **Healthy and Safe Communities**

*Hamilton is* a safe and supportive city where people are active, healthy, and have a high quality of life.

### **Clean and Green**

Hamilton is environmentally sustainable with a healthy balance of natural and urban spaces.

### **Built Environment and Infrastructure**

*Hamilton is* supported by state of the art infrastructure, transportation options, buildings and public spaces that create a dynamic City.

#### **Our People and Performance**

Hamiltonians have a high level of trust and confidence in their City government.

## APPENDICES AND SCHEDULES ATTACHED

- Appendix "A" Comments on ERO Posting #013-4293 "Bill 66, Restoring Ontario's Competitiveness Act, 2018"
- Appendix "B" Comments on ERO Posting #013-4125 "Proposed open-for-business planning tool" and ERO Posting #013-4239 "New Regulation under the Planning Act for open-for-business tool"