

November 14, 2024

Ministry of Municipal Affairs and Housing
777 Bay Street
Toronto, ON M7A 2J3

Re: Proposed Amendment to the Planning Act as per ERO Posting 025-1159

To Whom it May Concern,

On behalf of the City of Hamilton, I am pleased to provide this letter as the submission regarding proposed amendments to the Planning Act as per ERO Posting 025-1159 - Reducing Red Tape and Burden to Build Training Centres.

The Provincial Government's important role in planning has been to establish and implement a policy-led planning framework with a deliberate focus on balancing various competing objectives when making planning decisions. Legislative changes of late, and now the proposed amendment to the *Planning Act* relating to exempting worker training centres funded by the Ministry Development Fund represents a departure from this policy led planning framework.

The City has expressed concerns with proposed amendments that result in exclusions from the *Planning Act*, most recently the Section 62.0.2 exemption of post-secondary institutions. As detailed in the City's comments on Bill 185, while the City is supportive of providing more streamlined approvals for post-secondary institutions, the exemption from the provisions of the *Planning Act* removes the City's ability to provide regulations that address site specific context, integration into communities, servicing constraints and orderly development. These comments extend to the proposed Bill 30 exemption of worker training centres funded through the Ministry of Labour, Immigration, Training and Skills Development. While prioritizing the increase in training capacity in the province is supported, the proposed exemption from the provisions of the *Planning Act* risks transparency and accountability.

Further, there is additional concern regarding potential adverse impacts given the range of uses that may be subject to the worker training centre exemption, which may also extend to both private and public entities. Should there be differences in provincial oversight between facilities, City staff are concerned about matters of compliance and accountability when municipalities have no ability to regulate.

In terms of explicitly prohibiting these uses in the Greenbelt Area, Staff are supportive of the prohibition. However, in addition to lands within the Greenbelt Area, the City of Hamilton includes lands outside of the urban boundary and outside of the Greenbelt Area. Planning Staff are concerned that permitting skills and training centres on these

rural lands without any local planning oversight may risk negative impacts on the primary agricultural function of these lands and to the natural heritage features and natural heritage systems that are prevalent. Consideration should be given to restricting training and skills development centres to urban lands.

Staff are supportive of continued investment in skill and training centres across the province. However, staff are concerned that these changes may lead to adverse impacts and less transparency and accountability.

These comments are an extension of the previous City of Hamilton comments regarding Bill 30, Working for Workers Seven Act, submitted to the Province in July 2025, which have been attached for convenience.

Following the submission of comments on the Environmental Registry of Ontario posting staff will be taking a report to City Council. Council's position will be forwarded to the province once it has been ratified.

Thank you for the opportunity to comment. City staff would be pleased to meet with you to discuss these comments in greater detail.

Sincerely,



Anita Fabac, MCIP, RPP
Acting Director of Planning and Chief Planner
Planning Division
Planning and Economic Development Department
City of Hamilton

Attachments (1)

City of Hamilton Comments – dated July 8, 2025