

Safeguarding Critical Municipal Planning Processes and Authorities

AMO'S SUBMISSION TO THE ENVIRONMENTAL REGISTRY OF ONTARIO &
REGULATORY REGISTRY ON MATTERS RELATED TO BILL 30, *WORKING FOR
WORKERS SEVEN ACT, 2025*

ERO 025-1159

November 16, 2025

Executive Summary

The Association of Municipalities of Ontario (AMO) appreciates the opportunity to provide comments on Bill 30, *Working for Workers Seven Act, 2025* through the Environmental Registry of Ontario posting on proposed amendments to the *Planning Act* (and planning provisions in the *City of Toronto Act, 2006*) (ERO # 025-1159).

Amendments to the *Planning Act* and *City of Toronto Act, 2006*

Over the last several months, municipalities across Ontario have been at the front lines of trade and tariff disruptions, navigating their direct impacts on local economies and workforces. Municipalities understand the need for bold and innovative action to respond to unprecedented economic challenges and applaud the government for taking steps to protect workers and the economy. AMO has commended the province for its strong, decisive leadership in response to the threat posed by tariffs and related measures.

AMO and its members also understand the need to make planning and development processes faster and more streamlined, especially when building the infrastructure that Ontario workers and businesses require for a competitive and resilient workforce. That is why AMO previously supported other, more focused public sector *Planning Act* exemptions for facilities such as schools, post-secondary institutions, hospitals, long-term care homes, and childcare centers from *Planning Act* requirements. Risks associated with these exemptions are mitigated by the robust regulatory and accountability frameworks governing these facilities and their operations. These frameworks provide the oversight and control measures necessary to meet important health, safety, financial, environmental, and broader community objectives and to properly mitigate *Planning Act* exemption risks. However, the legislative amendments proposed in Bill 30 that would exempt projects funded by the Skills Development Fund (SDF) – Capital Stream from the *Planning Act* and planning provisions in the *City of Toronto Act 2006* do not meet these standards.

While there are many elements of Bill 30 that appear to be responsive to urgent needs in the context of ongoing tariff concerns, AMO questions the rationale for the proposed legislative amendments in Bill 30. Under the eligibility criteria of the SDF's Capital Stream, any private employer in Ontario can apply for funding as primary applicants. The proposed legislative amendments would allow for any private entity, which operate without rigorous public accountability frameworks and reporting, to be exempt from the *Planning Act* and planning provisions in the *City of Toronto Act 2006*, based solely on being a recipient of SDF Capital Stream funding. The eligibility criteria of the SDF's Capital Stream is insufficient and too broad in scope to justify wholly exempting any funded project and recipient private organization from needing to meet important municipal planning standards in the *Planning Act*.

Exempting projects funded through the SDF's Capital Stream from the *Planning Act*

poses a range of potential risks and impacts for municipalities that will likely put development and growth in Ontario at risk – the opposite of what the Bill intends to do with this proposal.

Loss of municipal site planning control

The proposed legislative amendments in Bill 30 to exempt SDF Capital Stream projects from the *Planning Act*, would erode municipal oversight of site planning control. This could have substantial impact on municipalities across the province, limiting their ability to:

- Prevent building on flood plains and lands critical for stormwater management. This could result in an increased risk of flooding in and around an area designated for an SDF Capital Stream project.
- Ensure safe design of transportation features such as road access, loading areas, parking, and public walkways.
- Install easements required to maintain and repair public infrastructure.

Loss of municipal infrastructure planning control

The exemption of SDF Capital Stream projects from the *Planning Act* would erode municipal infrastructure planning control, which municipalities rely on for proper long-term planning.

- Without municipal infrastructure planning oversight through the *Planning Act*, a project funded through SDF's Capital Stream could put strain on municipal servicing. Unmanaged increased draws on municipal servicing – for example, if a project uses a significant portion of a municipality's service capacity (i.e. water) – could limit or delay future development in the project area, possibly delaying other critical infrastructure development planned nearby.
- Exempting projects funded through SDF's Capital Stream from the *Planning Act*, could also mean that these projects are built without consideration of current or future property uses. This could include areas designated for residential purposes, prime agricultural lands, or land reserved for educational use.

Restricts municipal ability to comply with provincial planning policies

Allowing recipients of SDF's Capital Stream funding to be exempt from the *Planning Act* will create a potential misalignment with provincial planning policy requirements and broader land use planning policy frameworks – limiting the ability of municipalities to ensure compliance with the Provincial Planning Statement (PPS). This could include policy requirements set out in the PPS such as building on prime agricultural lands or environmentally sensitive areas.

Conclusion

The municipal sector understands that there is a need for innovative solutions to take on the extraordinary economic and fiscal challenges presented as a result of ongoing trade and tariff disruptions. This includes the need to make planning and development processes faster and more streamlined to spur Ontario's economy and build the infrastructure that communities desperately need. This is why AMO has previously supported other more focused public sector *Planning Act* exemptions which retain robust regulatory and accountability frameworks. However, the exemptions proposed under Bill 30 will likely put development and growth in Ontario at risk. Despite significant fiscal pressure and rising contribution costs, municipalities have been increasing investments in infrastructure in 2025 to support growth, manage climate change, and maintain critical infrastructure. Further encroachment into municipal approval processes, as is proposed in this legislative amendment, are not justified.