



# Memorandum

**TO:** Board of Directors

**FROM:** Lisa Burnside, Chief Administrative Officer (CAO)

**PREPARED BY:** T. Scott Peck, MCIP, RPP, Deputy CAO/Director,  
Watershed Planning & Engineering

Mike Stone, MCIP, RPP, Manager, Planning, Stewardship  
& Ecological Services

**MEETING DATE:** March 4, 2021

**RE:** Annual Reporting on CA Permit Review Timelines –  
January 1, 2020 to December 31, 2020

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## BACKGROUND

As part of Conservation Ontario's (CO) initiative relating to the Client Service and Streamlining Initiative (CSSI), in September 2019, the Board of Directors of the Hamilton Conservation Authority (HCA) approved the HCA Client Service Standards Commitment.

Related to the implementation of service level targets, CO has asked Conservation Authority's in high growth areas to track their review times for the issuance of Section 28 permits and to periodically report these to CO. For 2020, reporting was completed in April and September with a report presented to the HCA Board on September 3, 2020.

Starting in 2021, reporting will take place annually to CO, the Board and will be published in HCA's Annual report. Using the CO Annual Reporting on Timelines Template, HCA's permit review timelines for 2020 are included as Attachment A.

## STAFF COMMENT

HCA is committed to providing excellent client service, and we have a strong history of working cooperatively with our watershed municipalities, residents and businesses to ensure efficient and timely planning and regulatory review processes.

## Section 28 Application Service Standard Guidance – MNRF and Conservation Ontario

HCA has tracked permit review timelines for many years, based on standards that were set by the province in 2010 (MNRF, Policies and Procedures for Conservation Authority Plan Review and Permitting Activities, May 2010). This policy directs that conservation authorities are to render an application decision regarding a permit within 90 days for a major application and 30 days for a minor application.

Additionally, as part of a renewed commitment to efficient regulatory services, CO created a second document titled *Client Service Standards for Conservation Authority Plan and Permit Review (2019)*. This guidance established a second set of service standards that conservation authorities would strive to meet as a best practice. The new CO best-practice service standards provide for shorter review and approval time frames in comparison to the previous standards, representing a 52% reduction in the overall timeline for major permit applications and 42% for minor permit applications. Under this framework, conservation authorities would make a decision within 28 days for major applications and 21 days for minor applications.

CO has requested that CAs track permit review times under both the 2010 and 2019 standards. The Annual Reporting on Timelines Template included in Attachment A reports on HCA's permit review times under both standards for January 1, 2020 to December 31, 2020. Attachment A also includes a table comparing the 2010 and 2019 review time standards.

### 2020 Data and Results

HCA issued 92 permits in 2020 with 87% meeting the 2010 standards 59% meeting the 2019 standards. Variances in meeting review time standards for the 2020 period can generally be attributed to the following:

- Complex applications that required more extensive consultation and review;
- Incomplete information and/or poor quality of technical reports received;
- Extended staff review/processing times due to Covid-related working conditions; and,
- A reduction in staff resources through a staff departure and two extended staff absences for personal health reasons.

While some of the variances are beyond staff control, staffing levels are returning to a normal level and Covid related review times have improved.

### **STRATEGIC PLAN LINKAGE**

The initiative refers directly to the HCA Strategic Plan 2019 - 2023:

- **Strategic Priority Area – Organizational Excellence**
  - Initiatives:
    - Continue to update and streamline operational policies and leverage technology to enhance business service delivery
    - Communicate both internally and externally about what HCA does and why

## **AGENCY COMMENTS**

N/A

## **LEGAL/FINANCIAL IMPLICATIONS**

N/A

## **CONCLUSIONS**

HCA is tracking and reporting on its permit review timelines in support of Conservation Ontario's Client Service Streamlining Initiative. On-going tracking and reporting of permit review times will continue to allow HCA staff to identify trends in service delivery and adapt as necessary to ensure continued efficient client service and will be reported on annually to the Board of Directors and CO.

## Attachment A

**Table 3: Annual Reporting on Timelines for Permissions under Section 28 of the *Conservation Authorities Act* – Hamilton Conservation Authority, January 1 – December 31, 2020**

Hamilton Conservation Authority	Number of Permits Issued Within Policy and Procedure timeline <sup>i</sup>			Number of Permits Issued Outside of Policy and Procedure Timeline		
	Major		Minor	Major		Minor
	14		66	1		11
	Number of Permits Issued Within CO Guideline timeline			Number of Permits Issued Outside of CO Guideline timeline		
	Major	Minor	Routine	Major	Minor	Routine
	6	48		9	29	

<sup>i</sup> Ministry of Natural Resources and Forestry. *Policies and Procedures for Conservation Authority Plan Review and Permitting Activities*. 2010

### Comparison of 2010 & 2019 Permit Review Time Standards

Permit Process Step	2010 Standards	2019 Standards
	MNRF Polices & Procedures	CO Client Service Guideline
Notification of Complete Application Requirements (Preconsultation)	All applications - 21 days	Major - 14 days Minor - 7 days
Notification of Complete Application	All applications - 21 days	Major - 21 days Minor - 14 days Routine - 10 days
Application Decision	Major - 90 days  Minor - 30 days	Major - 28 days (30 days each resubmission)  Minor - 21 days (15 days each resubmission)  Routine - 14 days (7 days each resubmission)