



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
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MEETING DATE: March 2, 2023

RE: Annual Reporting on CA Permit Review Timelines –
January 1, 2022 to December 31, 2022

BACKGROUND

In April 2019, Conservation Ontario (CO) Council endorsed the Conservation Ontario Client Service and Streamlining Initiative (CSSI). This initiative is intended to help support the Province's strategic objectives through improved client service and accountability among Conservation Authorities (CA).

As part of the CSSI, CO working in cooperation with its partner CA produced the *Guideline for Client Service Standards for Conservation Authority Plan and Permit Review*, which was endorsed by the CO Board of Directors in June 2019 (amended in December 2019). Included in this guideline are recommended service level targets for the review and issuance of CA permits under Section 28 of the *Conservation Authorities Act*.

Related to the implementation of service level targets, CO has asked Conservation Authorities in high growth areas to track review times for the issuance of Section 28 permits and to report these to CO annually. HCA's review timelines for permits issued in 2022 are summarized in Attachment A. This summary has been provided to CO as part of annual reporting under the CSSI.

STAFF COMMENT

HCA is committed to providing excellent client service, and has a strong history of working cooperatively with our watershed municipalities, residents and businesses to ensure efficient and timely planning and regulatory review processes. As part of the CSSI, in September 2019, the HCA Board of Directors approved the HCA Client Service Standards Commitment, which includes targeted review times for the review and issuance of permits.

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.

As part of a renewed commitment to efficient regulatory services through the CSSI, CO produced the *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, 2022 to December 31, 2022. Attachment A also includes a table comparing the 2010 and 2019 review time standards.

2022 Data and Results

HCA issued 87 permits in 2022, with 90% of issued permits meeting the 2010 standards and 49% meeting the 2019 standards. These represent similar results in comparison to 2021 and 2020, as summarized in the table below.

| Year | No. Permits Issued | % Meeting 2010 Standards | % Meeting 2019 Standards |
|------|--------------------|--------------------------|--------------------------|
| 2022 | 87 | 90 | 49 |
| 2021 | 99 | 84 | 51 |
| 2020 | 92 | 87 | 59 |

Permits that did not meet review time standards in 2022 can, in part, be attributed to complex applications that required more extensive consultation and review, or applications where incomplete submissions were received. Additionally, departmental staffing has not been at full complement due to staff departures, sick leave and retirements. In this regard, staff are working to fill the vacant Conservation Planner position and supplement our staff complement with the addition of a contract Planner position to ensure we have a full staff complement for our planning and regulation program.

Further, continued focus on meeting permit timing targets remains a priority. Staff will be undertaking some review to identify any measures to implement to improve customer service delivery timeframes to better meet the 2019 best practice standards recommended by Conservation Ontario. This could include internal administrative processes that may help support reviews (e.g. Online application submission portal, checklists etc.), as well as identify any further staffing requirements to ensure internal capacity required to meet service targets.

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 Conservation Ontario.

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, 2022

| | | | | | | |
|---------------------------------|--|-------|---------|---|-------|---------|
| Hamilton Conservation Authority | Number of Permits Issued Within Policy and Procedure Timeline ⁱ | | | Number of Permits Issued Outside of Policy and Procedure Timeline | | |
| | Major | | Minor | Major | | Minor |
| | 29 | | 49 | 2 | | 7 |
| | Number of Permits Issued Within CO Guideline Timeline | | | Number of Permits Issued Outside of CO Guideline Timeline | | |
| | Major | Minor | Routine | Major | Minor | Routine |
| | 15 | 28 | | 16 | 28 | |

ⁱ 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) |