



**SUBJECT: Bill 108 Timelines**

**TO: Community Planning, Regulation & Mobility Cttee.**

**FROM: Community Planning Department**

Report Number: PL-06-20

Wards Affected: All

Date to Committee: June 9, 2020

Date to Council: June 22, 2020

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**Recommendation:**

Direct the Director of Community Planning to process future development applications in accordance with Option One outlined in community planning department report PL-06-20.

**PURPOSE:**

To seek direction from Council on adjustments to the development application review process in response to the reduced timelines legislated by Bill 108, "More Homes, More Choice: Ontario's Housing Supply Action Plan".

**Vision to Focus Alignment:**

- Increase economic prosperity and community responsive city growth.
- Building more citizen engagement, community health and culture.
- Deliver customer centric services with a focus on efficiency and technology transformation.

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**Executive Summary:**

This report provides a review of changes to processing timelines in the *Planning Act* brought in by Bill 108, as well as a review of appealed applications dating back to 2011.

Three Options for processing Official Plan Amendment applications, Zoning By-law Amendment applications and applications for Plans of Subdivision are presented.

These Options are evaluated using the following Criteria:

- Planning Outcome (best outcome)
- Staff Resources (least cost)
- Economic Development (best reputation)
- Public Engagement (most engagement)
- Risk of Non-Decision Appeal (least risk)
- Risk of Appeal of Decision (least risk)

Based on this evaluation staff recommend that Council direct the Director of Community Planning to process future development applications in accordance with Option One.

On April 14, 2020 Bill 189, *An Act to amend various Acts to address the coronavirus (COVID-19)*, received Royal Assent. Among other measures, this Act provided wide discretion to the Minister of Municipal Affairs and Housing to enact an emergency regulation which could exempt *Planning Act* timelines from the current suspension imposed by earlier provincial orders issued under the *Emergency Management and Civil Protection Act*. That regulation was filed and came into force on April 15, 2020 as O. Reg. 149/20. The Regulation has the effect of suspending planning application processing and appeal timelines during the time in which the Provincial State of Emergency is in effect. As such, any direction resulting from this report will be implemented once the Provincial State of Emergency is no longer in effect.

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## **Background and Discussion:**

### **Statutory Timelines & Hearing Process**

Bill 108, “More Homes, More Choice: Ontario’s Housing Supply Action Plan”, resulted in many changes to the *Planning Act*, including revised legislated review timelines for Official Plan amendments (OPAs), Zoning By-law amendments (ZBAs) and subdivision applications. The new Bill 108 timelines are in force as of the date of Royal Assent, June 6, 2019.

<b>Application Type</b>	<b>Bill 139 - 2017 (days)</b>	<b>Bill 108 - 2019 (days)</b>
<b>Official Plan Amendment</b>	210	120
<b>Zoning Bylaw Amendment</b>	150	90

<b>Plan of Subdivision</b>	180	120
<b>Combined Applications</b>	210	120

To meet the legislated timeline a Council decision to approve an implementing OPA, ZBA or Subdivision, or to refuse an application, must be made within the prescribed number of days. Community Planning, Regulation & Mobility Committee (CPRM) meetings, preparation of development agreements and negotiation over community benefits must be completed prior to the statutory deadline.

Failure by a municipality to make a decision within the timelines set out in the chart above, allows an applicant to appeal the application to the Local Planning Appeal Tribunal (LPAT) on the grounds of “non-decision”.

Bill 139 was introduced in 2017. It abolished the Ontario Municipal Board (OMB), and established the LPAT process, where by appeals were evaluated on whether a Council decision was in conformity and consistent with provincial policy, and the LPAT decision was based on the materials and information that had been considered by the municipal Council. Under Bill 139, if an appeal was based on the failure of a municipal council to decide on an application within the legislated timeline, the appeal was evaluated based on documents related to the application available to the municipality prior the appeal. No new evidence or testimony was considered.

Bill 108 was introduced in 2019. Currently, under Bill 108, while the LPAT title remains, the appeals process has reverted to the previous OMB system of *de novo* hearings. The term *de novo* means ‘from the beginning’ and requires the hearing to take place as if no previous Council decision has been made. The LPAT tribunal member reviews the submitted materials, but also hears new evidence, including examination of expert witnesses and consideration of new technical reports and plans. Therefore, the City’s position in an appeal is not strengthened by having a Council decision in place. As such, the risk in providing a decision outside of the required timelines is also reduced.

**Non-Decision Appeals:**

In the majority of cases, appeals are lodged by an applicant or resident who disagrees with the decision of Council to approve or refuse a development application. Historically, it is very rare for an applicant to appeal for non-decision, as evidenced by the data presented below. This may be because the timeline and costs associated with the LPAT process are generally greater than an iterative process in order to reach a favourable decision by Council.

Applications for infill and intensification are complicated and it takes time for staff and the applicant to address technical, design and community issues before bringing a report to Council. Only the most straightforward of applications are completed within legislated timelines. An iterative process between staff and the applicant, regardless of legislated timelines, is a system which allows time for public engagement including consultation with Council appointed Citizen Advisory Committees, for a thorough assessment of technical issues by agency and city staff, and for the applicant to make improvements to the proposed development in response to these technical issues and comments.

In limited cases, an applicant recognizes that there may be no support for their application and chooses to appeal the development for non-decision before a Council decision takes place.

### **History of non-decision appeals**

Prior to Bill 139 very few applications were appealed for non-decision. Between 2011 and 2018 there were 104 development applications. Of those:

- 9 applications were processed within the statutory deadlines.
- 2 applications were appealed for non-decision (ADI on Martha St. and Rylander Holdings on Appleby Line) prior to Royal Assent for Bill 139.

In 2017/2018, as a consequence of Bill 139, the uncertainty surrounding the changes to the planning system and the transition rules that would apply to the new LPAT, many municipalities experienced a significant increase in appeals for non-decision in the months leading up to the Proclamation of Bill 139 on April 3, 2018.

- The City of Burlington received 5 appeals for non-decision during this period:
  - National Homes – 2100 Brant Street;
  - National Homes – 484-490 Plains Road East;
  - First Capital – 5111 New Street;
  - O'Malley Enterprises Ltd. – 35 Plains Road East; and,
  - Chelten Developments Inc. – 92 Plains Road East.

In several cases, the appellants contacted Planning staff to request that staff continue to work with them to process their applications while they maintained their appeal rights under the previous OMB system.

Between Proclamation of Bill 139 in April of 2018, and Royal Assent of Bill 108 the City of Burlington received no appeals for non-decision.

After Royal Assent of Bill 108 on June 6, 2019:

- 4 applications were appealed for non-decision:
  - Amica - 1157-1171 North Shore Boulevard East;
  - Core Development - 2093, 2097, 2101 Old Lakeshore Road, 2096, 2100 Lakeshore Road;
  - 2069-2079 Lakeshore and 383-385 Pearl; and,
  - Mattamy (Monarch) Limited - 2082, 2086 and 2090 James Street.

In each of these instances the City was prevented from making a decision due to the Interim Control By-law. Generally, applicants continue to work with staff to resolve issues and bring the best possible development forward to Council.

Planning staff maintain that the best outcomes for a development application are achieved when the applicant has time to consider public and technical feedback and resubmit the application with changes that respond to and mitigate concerns raised.

### **How are Our Peer Municipalities Responding to Bill 108?**

Planning staff reached out to other mid-sized communities in Ontario to find out how they were adjusting to the Bill 108 timelines. Most municipalities are continuing to process applications in the same way, although some have implemented changes to their preconsultation process similar to Burlington's and some are involved in process reviews. The responses are summarized below.

<b>Municipality</b>	<b>Comment</b>
<b>Kingston</b>	No changes being considered at this time.
<b>Ajax</b>	Improvements to preconsultation process with more detailed minutes and requirements.
<b>Markham</b>	Undertaking a process review to consider new timelines.
<b>Mississauga</b>	Hold the statutory public meeting prior to receiving technical comments.
<b>St. Catharines</b>	No changes being considered at this time.
<b>Niagara Falls</b>	No changes being considered at this time.
<b>Waterloo</b>	No changes being considered at this time.
<b>Oakville</b>	Digital submissions where possible to reduce circulation times

	Provide a commenting template for all reviewers to assist planners in preparing a comment summary for the applicant
<b>Vaughan</b>	Working on draft Bill 108 Guidelines
<b>Barrie</b>	No changes being considered at this time
<b>Kitchener</b>	Undertaking a process review to look at efficiencies
<b>London</b>	Undertaking a process review to consider new timelines
<b>Oshawa</b>	No changes being considered at this time
<b>Whitby</b>	No changes being considered at this time
<b>Windsor</b>	No changes being considered at this time
<b>Guelph</b>	No changes being considered at this time

Note that the above procedures relate to processes prior to the Provincial State of Emergency.

### **Application Processing Steps**

Appendix A contains a list of the steps in a Zoning By-law Amendment application, illustrating how they might fit within the 90-day statutory processing timeframe (including weekends and holidays), summarized as:

- 30 days – file set-up stage.
- 15 days– review application, draft recommendation report.
- 45 days – finalize a recommendation report, get it before Committee and Council.

The 15-day timeframe to review the application and draft a report presents several challenges to processing a complex development application. It does not allow flexibility or buffer time to account or allow for:

- An applicant to make revisions to address technical or public comments;
- Staff processing multiple files;
- Staff having to prepare for and attend LPAT Hearings;
- Staff providing counter service to applicants and the public;
- Staff having professional development and training requirements; or
- Staff having weekends, vacation and sick days.

Development review requires a great deal of cooperation, time management and workload adjustment from other departments. It is assumed that internal departments

will be able to give immediate attention to development application circulations to meet a 15-day commenting deadline, including weekends and holidays. It assumes that Communications staff can immediately prepare signage, set up web pages, print and mail public notices. It also assumes that staff in these departments are available as needed during the 15-day processing window so that any technical questions or issues can be resolved.

The timeline also relies on external agencies to meet a 15-day commenting window. The comments of external agencies are crucial to the evaluation of a development proposal. Planning staff rely on Halton Region to provide Provincial review of development through their MOU with the Ministry of Municipal Affairs and Housing. Planning staff also rely on the technical expertise of Provincial Ministries, Conservation Halton and Halton Region staff in their review of matters including Environmental Impact Studies and assessment of impacts of a development on the natural environment. The City does not have this expertise in-house, and peer reviews of technical studies would take longer to arrange than the 15-day commenting deadline would allow. Further, there are matters which the City does not have jurisdictional authority over, such as impacts to provincial and regional roads.

The Official Plan policies for public participation require that at least one public meeting be held by Committee and that adequate time may be allowed after the meeting for staff to analyze all public comments before the proposed amendment is dealt with by Council. This will be difficult to achieve under the new timeframe.

The reduced timeframes allow limited opportunity for Council appointed Citizen Advisory Committees to provide input to staff. Advisory Committees generally meet monthly and their operating procedures may need to be revised to provide comment within a 15-day timeline.

Finally, the methodology in Appendix A assumes that Committee and Council dates are available at more frequent intervals, including throughout the summer and holiday seasons.

For an Official Plan Amendment and/or Subdivision application, and for combined applications, Bill 108 requires that Council make a decision within 120 days. While the greater number of days allows more time for consideration by staff, agencies and the public, these applications also have a much higher degree of complexity to be evaluated. As such, the benefit of the additional time is negligible.

### **Evolving the Organization**

In September 2019 the City Manager launched Phase I of ‘Evolving the Organization’, a new organizational design was put in place to implement the goals in Vision to Focus and beyond. Phase I addressed changes at the senior management level. Currently, each department is considering resourcing to implement the goals of Vision to Focus through Phase II of this initiative.

### **Strategy/process**

The following three options are being considered to bring development files to Council while working within the Bill 108 timeframes. Each option is followed by a list of pros and cons. An evaluation matrix follows which assesses the options against a list of criteria.

For all options, the current enhanced preconsultation process will be implemented. Applicant-led pre-application community meetings are currently occurring to allow for early public input into the development process. Protocol for these preapplication meetings is currently under review by staff for a forthcoming recommendation to Council. In addition, as of January 1, 2020 a voluntary technical preconsultation has been implemented to assist the applicant to address any deficiencies in the required studies and reports prior to making a formal application. The preconsultation process is prior to an application being submitted to the City, and has no impact on the legislated timeline.

### **Option One**

<p>Recommendation Report (#1): Refusal recommendations are made within the legislated timeframe</p>	<p>Where an application is not supported by staff, a statutory public meeting and a recommendation for refusal will be made within the statutory timeline.</p>
<p>OR</p>	
<p>Recommendation Report (#1): Recommendations are made to direct staff to proceed to work with the applicant</p>	<p>Where an application has potential to be supported, but issues have not yet been sufficiently resolved, a statutory public meeting will be held, along with a staff recommendation that Council direct staff to continue to work with the applicant until outstanding issues have been resolved and an application can be supported.  Recommendation Report #1 will include a comprehensive evaluation of the application based on comments received at</p>



	<p>that time, so that Council has all information available at this stage.</p> <p>Should Council wish to make a decision to approve or refuse the application at the statutory public meeting, they have the opportunity to do so within the statutory timeframe.</p>
<p>Recommendation Report (#2):</p> <p>Recommendations are made outside the legislated timeframe</p>	<p>A second (final) recommendation report will be brought forward when all issues are resolved.</p>

Pros:

- The onus is on applicants to provide quality application submissions.
- Where Council approves a staff recommendation to continue to work with the applicant, the applicant will be able to revise their submission based on technical and public input, and planning staff will have sufficient time to fully consider the proposal, resulting in the best planning outcome.
- Planning staff have sufficient time to fully consider the proposal in order to provide an independent and professional recommendation to Council.
- Applications which are not supported are dealt with within the statutory timeline.
- The statutory meeting takes place prior to a Recommendation Report (#2), allowing an applicant to incorporate public comments in a revised submission.
- Recommendation Report (#2) provides a second opportunity for public comments to be heard by the CPRM Committee.
- Council retains the ability to decide on an application within the legislated timeframe, regardless of the recommendation by staff.
- If an appeal for non-decision is launched by an applicant, the *de novo* hearing process means that staff will have the ability to present complete evidence of the best planning outcome to the LPAT.

Cons:

- An iterative approach between staff and an applicant does not guarantee that issues will be sufficiently addressed by the applicant. Therefore, there is some possibility that staff will recommend refusal to Council after the legislated timeframe.
- A Council direction that staff continue to work with an applicant is not a Council decision on the development application; therefore, an appeal for non-decision could still be made by the applicant at a later stage.

- The City is unable to control for the timing of comments from external agencies. Therefore, fulsome comments may not have been considered in Recommendation Report #1, within the statutory time.
- There is no opportunity for a mandatory two-stage public meeting process where the application is being refused.

Required Resources:

- Additional staff resources may be required in Community Planning, Transportation, Capital Works and Zoning to ensure that analysis and comments can be provided within the 15-day comment period. This will be evaluated through Phase II of Evolving the Organization.

**Option Two**

<p>Recommendation Report: Recommendations are made within the legislated timeframe</p>	<p>The statutory public hearing and recommendation report take place at the same CPRM Meeting within the statutory timeline.</p> <p>Where an application is not supported, a recommendation for refusal will be made within the statutory timeline.</p> <p>Where an application has potential to be supported, but issues have not yet been sufficiently resolved, staff will recommend that Council refuse the application. However, Council could consider waiving the application fee for a new application on the same property where this new application provides revisions to address the technical and public comments raised while processing the original application.</p>
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Pros:

- Following an initial refusal, where an applicant elects to submit a new application, the ongoing work has greater likelihood of addressing technical and public concerns raised by the first application, resulting in better development.
- The new application will “re-set” the statutory timeframe and allow further time for public and technical review, while reinstating the applicant’s rights.

Cons:

- Waiving fees on a new application could amount to bonusing, which is not permitted under the *Municipal Act*. Further, waiving of fees may be viewed as being in bad faith if there is any suggestion that the City will waive fees for an application that it likes and is supportive of.
- While Council may waive Burlington’s fees, it cannot be anticipated that external agencies would also be willing to waive their fees for a second application.

- Staff are unable to control for the timing of comments from external agencies. Therefore, fulsome comments may not be available for consideration in the report.
- Without the opportunity to address technical and public comments within the legislated timeline, the majority of initial applications will likely result in recommendations for refusal.
- Public confusion may result from Council accepting and processing a second application if Council has already reviewed and refused the proposed development.
- In cases where there is potential for an application to be revised to address concerns, a refusal may potentially be viewed by applicants in a negative way - deterring them from resubmitting. As such the applicant may appeal the Council decision rather than continuing to improve the development proposal.
- Planning staff anticipate that the justification for Council's decision to refuse for resubmission will likely be viewed by the LPAT as being similar to a non-decision.
- Planning staff will have difficulty defending a decision to refuse an application on the basis of insufficient analysis.
- Resubmissions will have the statutory and administrative requirements of a new application; steps to set up a new file (copying, circulation, web page, signage) will have to be repeated and will increase processing time in contrast to the Option One of continuing to work on the original application via a revised submission.
- Waiving of application fees for a new submission would have a financial impact to the City, whereas currently revised submissions for ongoing review of an application entails a revision fee paid by the applicant.

**Required Resources:**

- Additional staff resources will be required in Community Planning, Transportation, Capital Works and Zoning to ensure that analysis and comments can be provided within the comment period.
- Additional administrative support will be required to set up the supplementary applications which could arise under this Option.

**Option Three**

<p>Recommendation Report (#1): Refusal recommendations are made within the</p>	<p>Where it is deemed by staff that an application is not supportable, a statutory public meeting and a recommendation report to refuse the application will be presented to Council within the statutory timeframe.</p>
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legislated timeframe	
OR	
<p>Information Report (#1):</p> <p>Information is provided within the legislated timeframe</p>	<p>Where it is deemed by staff that an application has the potential to be supported, a statutory public meeting will be scheduled, and staff will prepare an information report similar to that which is currently presented to CPRM Committee.</p> <p>Planning staff will document public comments and respond to questions of the CPRM Committee. The report will not include an evaluation of the application based on comments received at that time, as the comments are likely to be incomplete at this stage.</p> <p>Should Council wish to make a decision to approve or refuse the application at the statutory public meeting, they have the opportunity to do so within the statutory timeframe through a motion of Council.</p>
<p>Recommendation Report (#2):</p> <p>Recommendations are made outside the legislated timeframe</p>	<p>The applicant will be provided with all public and technical comments and be invited to provide a revised submission within a six-month timeframe.</p> <p>Where a revised application has been received within six months, staff will prepare a recommendation report based on comments received for the revised application.</p> <p>Where no revised application has been received within six months, staff will prepare a recommendation report based on complete comments received for the initial application.</p>

Pros:

- The statutory meeting takes place prior to a recommendation, allowing an applicant to incorporate public comments in a revised submission.
- Recommendation Report (#2) provides a second opportunity for public comments to be heard by the CPRM Committee.
- The statutory meeting takes place within legislated timeline, and allows Council to make a decision on an application regardless of having a recommendation by staff, if it so chooses.
- Applications which are not supported by staff are always dealt with within the statutory timeline.
- The revised application has greater likelihood of addressing technical and public concerns, resulting in better development.

- Strict timelines are set for resubmission so that applications are not held over for months and even years before being reactivated.
- If an appeal for non-decision is launched by an applicant, the *de novo* hearing process means that staff will have the ability to present complete evidence of the best planning outcome to the LPAT.

Cons:

- Statutory public meetings will include similar information as is currently included in the initial public notice. Timing for the writing of an information report will typically not be sufficient to receive and incorporate technical comments.
- Timelines for the revised applications may result in a reduced quality of resubmissions.
- Timelines for the revised application will not be within the legislated timeframe, so there is a risk of appeal for non-decision.

Required Resources:

- No additional resources are required.

### **Evaluation Criteria**

In addition to the pros and cons listed above, the three options have been evaluated using the following criteria.

**Planning Outcome:** The option which provides staff with the ability to undertake a thorough and iterative review process resulting in the best planning advice to Council.

**Staff Resources:** The option which creates the need for the fewest additional staff resources and associated costs.

**Economic Development:** The option which builds the City's reputation as a business-friendly environment that attracts investment and has the opportunity to increase jobs within the City.

**Public Engagement:** The option which provides the greatest opportunity for public consultation.

**Risk of Non-Decision Appeal:** The option which reduces the potential for appeals on the basis of non-decision.

**Risk of Appeal of Decision:** The option which reduces the potential for appeals of Council's decision.

**Evaluation Matrix**

The following matrix rates the three options in each of the above criteria. The matrix provides a framework to compare and recommend a development review process.

	<b>Option One</b> (Recommendation to Proceed)	<b>Option Two</b> (Refuse and Resubmit without Fee)	<b>Option Three</b> (Collaborative Review with Deadlines)
<b>Planning Outcome</b> (best)	***	∅	**
<b>Staff Resources</b> (least cost)	**	*	***
<b>Economic Development</b> (reputation)	***	*	**
<b>Public Engagement</b> (most)	***	*	***
<b>Risk of Non-Decision Appeal</b> (least risk)	**	***	*
<b>Risk of Appeal of Decision</b> (least risk)	***	*	**
<b>Total Score:</b>	<b>16</b>	<b>7</b>	<b>13</b>

Based on the above matrix, staff recommend that Council approve Option One on the following analysis of each of the criteria:

**Planning Outcome:** Through fulsome public consultation and an iterative process with staff, Option One supports an applicant's opportunity to address technical and public concerns of an application, resulting in the best planning outcome.

**Staff Resources:** Compared to Option Three, Option One may require some additional resources to evaluate whether an application has potential to be supported. At this time, no additional FTE's are being recommended. The impact on staff workload will be

evaluated through Phase II of Evolving the Organization. Unlike Option Two, Option One requires no additional administrative resources.

**Economic Development:** Option One best represents the City as a business-friendly environment, demonstrating a willingness to work collaboratively with the development community, thereby attracting investment.

**Public Engagement:** For applications which have potential to be supported, Option One and Option Three maintain a two-stage report process. The Option One recommendation report is informed by technical comments at the statutory public meeting and Recommendation Report #1. This will allow an applicant to make revisions which reflect public comments heard at the statutory public meeting, prior to Recommendation Report #2. The public has a second opportunity to provide comments to the CPRM Committee at Recommendation Report #2 stage.

**Risk of Appeal for Non-Decision:** Compared to Option Two, Option One has some risk of appeal for non-decision as applications with the potential to be supported will typically extend beyond the legislated timeline. However, as previously mentioned, in Option Two a Council decision to refuse an application on the basis of insufficient analysis may be viewed by the LPAT as being similar to a non-decision, among other inherent concerns. Option One has moderately less risk of an appeal for non-decision compared to Option Three because of the City-imposed timeline for a resubmission in Option Three.

**Risk of Appeal of Decision:** Option One has the least risk of appeal of a decision by Council due to the continuance of the iterative process. Option Two risks that an applicant, challenged with administrative and cost considerations of a second application, may appeal a decision to deny the initial application, or there may be appeals based on perceptions of bonusing or operating in bad faith. As previously mentioned, in an appeal planning staff will have difficulty defending a decision to refuse an application at LPAT on the basis of insufficient analysis. The City-imposed timeline of Option Three limits the timeline in which the applicant can work iteratively with staff and the public to address issues prior to Council making a decision, resulting in an increased risk of appeal of Council's decision.

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### **Financial Matters:**

At this time, no additional FTE's are being recommended. The impact on staff workload will be reviewed through Phase II of Evolving the Organization. If necessary, a recommendation regarding staffing resources will be provided in that process.

#### **Total Financial Impact**

Not applicable.

#### **Source of Funding**

Not applicable.

#### **Other Resource Impacts**

Not applicable.

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### **Climate Implications**

Not applicable.

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### **Engagement Matters:**

Not applicable.

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### **Conclusion:**

The Bill 108 statutory deadlines for development applications have created a situation which impacts staff, the public, and the development community. Staff recommend that Council direct staff to implement Option One for the processing of development applications, allowing for an iterative process, in which staff provide an independent and professional recommendation to Council for the best planning outcome. The procedures outlined in this report will be implemented upon the lifting of the Provincial State of Emergency, when Bill 189 is no longer in effect.

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Respectfully submitted,

Brynn Nheiley MCIP, RPP  
Manager of Development Planning  
x7638



**Appendices:**

- A. Processing Steps for a Rezoning Application

**Report Approval:**

All reports are reviewed and/or approved by Department Director, the Chief Financial Officer and the Executive Director of Legal Services & Corporation Council. Final approval is by the City Manager.

## **Appendix A: Processing Steps for a Rezoning Application**

### **File Set-up:**

<b>Day 1</b>	Application submitted
<b>Day 2</b>	Material reviewed and application acknowledged as complete
<b>Day 3</b>	AMANDA & file set up, notice sign, web page, sketches
<b>Day 6</b>	Planner reviews submission and prepares notice letters
<b>Day 10</b>	Request for Comments and Public Circulation mailed out with three week commenting deadline
<b>Day 13 – 30</b>	Planner reads and evaluates technical materials, responds to questions, notice sign is posted, web page updated with public materials
<b>Day 31</b>	Public and technical comments due

### **Review of Application:**

#### **Days 31 to 45**

- Acknowledgement of public comments and response to questions
- Technical comments forwarded to applicant for response
- Review of technical comments & conditions
- Meetings with technical & agency staff to resolve issues & conflicting positions
- Formulate staff position
- Preparation of draft zoning by-law regulations and review by Zoning Examiners
- Circulation of draft zoning regulations & conditions to applicant
- Review application against Provincial, Regional and local planning policy in light of comments
- Consider cumulative impacts of requested changes to the zoning and potential mitigation measures
- Preparation of recommendation report

### **Analysis and Report Writing:**

<b>Day 45</b>	Draft Report completed by Planner
<b>Day 52</b>	Report reviewed by Planning Managers & revised by Planner
<b>Day 56</b>	Report approved by Planning Director
<b>Day 62</b>	Report approved by Legal & Finance
<b>Day 66</b>	Statutory public meeting notice mailed
<b>Day 69</b>	Report approved by City Manager
<b>Day 71</b>	Report printed
<b>Day 73</b>	Report released to Council
<b>Day 76</b>	Report released to the public
<b>Day 84</b>	Committee meeting
<b>Day 90</b>	Council meeting