
November 14, 2025

Province of Ontario – Ministry of Municipal Affairs and Housing

Re: Consultation on Proposed Special Economic Zones Criteria

Thank you for the opportunity to review and comment on the Environmental Registry of Ontario (ERO) posting 025-1077 regarding developing a regulatory framework to establish the proposed criteria for designating zones, projects and proponents in relation to Special Economic Zones. It is understood that the *Special Economic Zones Act, 2025* (the “Act”) is intended to support economic growth and development by unlocking new opportunities for long term investment. It is also understood that by default all laws apply in a special economic zone, and any modifications or exemption to provincial laws within special economic zones will be made on a case-by-case basis through future regulations. The current ERO posting aims to consult the public on criteria for designating zones, projects and proponent, which would be established through a Lieutenant Governor in Council regulation.

The Simcoe County District School Board (SCDSB) understands that initial discussion around use cases for special economic zones revolved around resource extraction activity and associated infrastructure, primarily in northern Ontario. However, there are no restrictions to where a special economic zone could be applied under the provisions of the Act and thus it is clear other economic activity could be considered. The SCDSB notes that new secondary schools are often included in discussions regarding economic activity and employment given the number of employees employed at a secondary school. All capital and operational funding flows from the province to the board, bringing with it a significant amount of provincial oversight and direct approval processes. Thus, the activity of publicly funded school boards is in essence activity of an arm of the province and so it makes sense that school boards could be considered a trusted proponent within a special economic zone, should the proposed designated project require the inclusion of a public secondary school. Identifying a public secondary school as a designated project should also be considered.

SCDSB planning staff respectfully request that the Minister ensure that any designated project adequately considers the adequacy of public service facilities, including schools, for any residential project or project including a residential component. This could be included in the draft regulation under policy 3.3.iv). Policy 3.3.iv) of the draft regulation states that the Minister must be satisfied that the project will benefit communities in Ontario after considering “other factors as the Minister considers appropriate” for a project to be designated. SCDSB planning staff respectfully request that the Minister include the adequacy of public service facilities as an “other factor” for residential projects or projects that include a residential component.

The Simcoe County District School Board is understanding of the government's focus on driving economic development and employment activity across Ontario, and provides these comments to demonstrate how the board can assist the province in meeting its goals and supporting local community development through the provision of needed educational facilities. Should you require additional information, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Bartmann". The signature is written in a cursive style with a large initial "K".

Kristen Bartmann, MPLAN
Planner
Simcoe County District School Board

Cc:

Simcoe County District School Board
Andrew Keuken, Senior Manager of Planning, Enrolment and Community Use
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