

November 14, 2025

Honourable Minister of Municipal Affairs and Housing
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, Ontario M7A 2J3

Dear Honourable Sir,

Re: Submission on a Proposed Regulatory Framework under the Special Economic Zones Act, 2025 and the Ontario Heritage Act

Thank you for the opportunity to provide comments on Proposed Special Economic Zones Criteria (ERO [025-1077](#)) and Proposed Regulation Under the Ontario Heritage Act – Archaeology Exemption Criteria (ERO [025-1081](#)). The Town of Niagara-on-the-Lake (“NOTL”) appreciates the Province’s commitment to strengthening Ontario’s economy and addressing the housing crisis during these uncertain times.

The comments provided below summarize input to NOTL Town Council on November 11, 2025.

Consultation on Proposed Special Economic Zones Criteria (ERO 025-1077)

The *Protect Ontario by Unleashing our Economy Act, 2025*, established the power to designate zones, projects and proponents through regulation if certain criteria are met and then create exemptions of modifications to permits, approval or other requirements for designated projects and proponents in those designated zones.

The stated intent is to allow for the advancement of critical, strategic and priority work while maintaining necessary safeguards and obligations, protecting Ontario’s industries, and mitigating the impact of trade disruptions.

The proposed regulatory framework establishes proposed criteria for determining exempted projects, proponents, and zones, as follows:

Proposed Project Criteria

- Significant and long-term economic benefit to the Province
- Strengthening local communities
- High likelihood of success
- Duty to Consult and, where appropriate, accommodate

Proposed Proponent Criteria

- Necessity
- Team Composition

- Reputable Compliance Record
- Duty to Consult and Where Appropriate, Accommodate
- Engagement Plan

Proposed Zone Criteria

- Geographic Boundaries
- Contains strategic economic activities
- Duty to Consult and, where Appropriate, Accommodate

With regard to the proposed zone and project criteria, Town staff would encourage consideration for criteria relating specifically to transportation and tourism. We also encourage continued dialogue with the Town on this criteria.

Transportation:

Projects that support efficient movement of goods and people through infrastructure expansion and multi-modal connections should be considered strategic priority work. Within the context of NOTL and Niagara Region, major transportation hubs and corridors, such as the Queen Elizabeth Way (QEW), St. Lawrence Seaway, Hoverlink, and Niagara District Airport are examples that would bring transportation options online and unlock potential for future development.

Tourism:

The tourism sector in NOTL and the broader Niagara Region is significant for employment and business generation both on a Provincial and National scale. As part of the consideration for significant and long-term economic benefit, the Town would encourage consideration for projects generating tourism, supported by expanded transportation infrastructure and servicing capacity to accommodate peak visitor demand.

Proposed Regulation Under the Ontario Heritage Act – Archaeology Exemption Criteria (ERO 025-1081)

The *Protect Ontario by Unleashing our Economy Act, 2025* introduced a tool to exempt properties from some of the requirements of Part VI of the Ontario Heritage Act (OHA), which addresses the conservation of archaeological resources.

The proposed criteria for exemption include:

- The activities being proposed will be economically significant or strategically important to the Ontario economy, as determined by the Lieutenant Governor in Council
- Indigenous communities are notified
- The property does not include any of the following:
 - A significantly known archaeological site
 - A burial site
 - An Aboriginal people's burial ground
 - A cemetery
 - A site of a former Indian residential school
 - An archaeological site identified under specified sections of the Act

The Town supports the protection of cultural artifacts and the return of Indigenous artifacts to the communities in which they belong.

While exemptions for priority projects may assist with project timelines, the proposal for exemption to Archaeological Assessments to advance Provincial priorities is concerning, as both the Town and Region have approved Archaeology Management Plans. Niagara-on-the-Lake is rich with archaeological resources from many Indigenous communities to the very early settlers of Upper Canada. Archaeological assessments help us to understand our past. By waiving these requirements, important artifacts could be lost forever.

Concluding Remarks

While the Town recognizes the intent of these proposed regulations to support Ontario's economy, there are many potential impacts to consider, many of which will become the responsibility of the local municipality. While streamlining the development process is important, local municipalities must consider good planning principles with a balanced approach to development, and protecting our natural and cultural resources. It is important that growth, development and economic prosperity be grounded in sustainability and accountability.

The Town respectfully requests that the Province consider the comments provided and consult further on any changes proposed to understand the implications at the local level.

Kind Regards,



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Town of Niagara-on-the-Lake



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Town of Niagara-on-the-Lake