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London
CANADA

November 14, 2025

**Consultation on Proposed Special Economic Zones Criteria
ERO number 025-1077**

To Whom It May Concern,

Thank you for the opportunity to comment on the Proposed Special Economic Zones criteria. The following questions and considerations have been identified by staff at the City of London.

We appreciate the intent behind the Special Economic Zones initiative and its goal of accelerating permitting and approvals. However, we believe additional clarity would help ensure transparency and alignment with municipal responsibilities. Specifically, the proposed criteria appear broad and leave significant discretion in the selection of Zones, Projects, and Proponents. This could have implications for municipalities. We respectfully suggest that the Government of Ontario provide further details before finalizing the criteria.

While we understand the objective of streamlining processes, exemptions from provincial Acts, Regulations, or Instruments may inadvertently remove safeguards that protect people, places, and the environment. The long-term impacts of such exemptions are uncertain and could outweigh potential economic benefits. To mitigate this, we recommend identifying a clear and exhaustive list of Acts, Regulations, and Instruments that may be exempted, rather than leaving the options open-ended.

Several proposed criteria rely on qualitative assessments, which may lead to inconsistent application. Introducing quantitative metrics would improve transparency and set clear expectations. Additionally, the criteria currently emphasize benefits without considering potential impacts. We suggest focusing on net benefits after the impacts are assessed and including consideration of long-term economic benefits for both Ontario and host municipalities. Without this, there is a risk of creating externalities that affect one municipality at the expense of others.

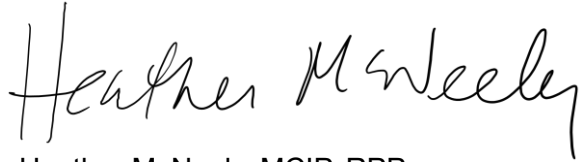
It is also unclear what role municipalities will have in designating Special Economic Zones within their boundaries. Municipal input is critical to avoid unintended consequences, such as circumventing the *Planning Act*, disorderly growth, or diversion of the allocation of infrastructure capacity. Further clarity is needed on whether projects within Special Economic Zones would be exempt from Development Charges, permitting, and inspection procedures, and whether they qualify for municipal incentives under Community Improvement Plans. Similarly, guidance on how provincial funding or subsidies factor into evaluations, and under the circumstances Special Economic Zone status could be revoked, would be helpful.

Finally, it is not clear that the proposed approach for Special Economic Zones could result in increases in accelerated approvals beyond what is currently achieved by a Minister's Zoning

Order. If a Zone, Project, and Proponent must first be scrutinized and designated as a Special Economic Zone, it may simply replace one process with another rather than improve timelines.

We respectfully request additional consultation with the Government of Ontario to collaboratively evaluate, discuss, and address the matters identified. Given the number of outstanding questions and the need for greater clarity in the proposed criteria, we encourage the Government to provide further detail prior to approving the Proposed Special Economic Zones criteria.

Sincerely,

A handwritten signature in black ink that reads "Heather McNeely". The signature is written in a cursive, flowing style.

Heather McNeely, MCIP, RPP
Director, Planning and Development
Housing and Community Growth
City of London

cc Matt Feldberg, Director, Municipal Housing and Industrial Development
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