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**London**  
CANADA

November 20, 2025

**Consultation on Simplifying and Standardizing Official Plans  
ERO number 025-1099**

Thank you for the opportunity to comment on the government's proposed regulation changes focused on simplifying and standardizing Official Plans. We appreciate the chance to provide feedback on this important initiative.

We wish to emphasize the importance of an Official Plan to a local municipality in terms of community engagement and cohesiveness. These plans, when done well, are carefully crafted to reflect the shared vision and values of the community, and they are deeply rooted in local context. The current proposal, while aiming to streamline planning processes, risks minimizing community-specific needs and area context—whether historical, geographical, physical, or social. Municipal decisions are inherently influenced by these local factors, and a standardized approach may overlook the nuanced realities that municipalities face.

Some of the features included in the Consultation may be helpful for municipalities initiating an Official Plan review process, and municipalities with currently out-of-date official plans could benefit from a simplified official plan writing process. But to require all municipalities to adopt a standardized official plan including generic land use designations will take away what makes each municipality unique.

For example, the City of London's High Density Residential Overlay identifies areas from our previous Official Plan that are suitable for higher-intensity development. This overlay is a product of detailed local analysis and community input. The current proposal does not appear to accommodate such tailored approaches, which are essential for effective and responsive planning.

Additionally, from a growth management perspective, we are concerned about the proposed use of standardized servicing maps. The review cycles for development charges—every 4 and 8 years—do not align with the 5-year review cycle of Official Plans. This misalignment could lead to inconsistencies and challenges in maintaining accurate and relevant planning documents.

We are also concerned about the proposed prohibition on secondary plans and the suggestion that key regulations – such as establishing street patterns, determining maximum building heights, or developing long-range servicing requirements – could be removed from consideration in any policy framework and deferred to the zoning by-law. This change introduces significant technical challenges and the likelihood of unintended, negative consequences. Zoning by-laws are a prescriptive implementation tool and lack the flexibility needed to guide development comprehensively. If foundational elements

like street networks are not embedded in the Official Plan, municipalities lose the framework necessary to ensure coordinated community planning and infrastructure delivery. This approach would result in fragmented planning, increased complexity, and a surge in site-specific applications to address missing details. Long-range servicing and infrastructure planning require secondary plans or similar guiding documents to secure necessary utilities and community amenities. Without these tools in place early, municipalities face inefficiencies and higher costs, ultimately undermining the goal of a more streamlined planning process.

We urge the government to consider the importance of flexibility, local context, and community-driven planning in any efforts to simplify and standardize Official Plans. Thank you again for the opportunity to provide input. We look forward to continued dialogue on this matter.

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

Sincerely,  
Heather McNeely  
Director, Planning & Development  
City of London

cc: Justin Adema, Manager, Long Range Planning