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Consultation on Simplifying and Standardizing Official Plans ERO number 026-0300

Thank you for the opportunity to comment on the Government's proposed regulatory changes intended to simplify and standardize Official Plans. We appreciate the opportunity to provide feedback on this initiative.

As previously stated in staff's submission to the Environmental Registry of Ontario dated November 20, 2025, we do not support the proposed approach to streamlining and standardizing Official Plans through a prescribed structure and standardized land use designations. While the objectives of improved clarity and consistency are understood, the proposed framework raises significant concerns related to municipal flexibility, responsiveness to local context, and the effectiveness of place-based planning.

Standardized Official Plan Structure

The introduction of a mandatory standardized Official Plan structure, including a fixed table of contents and prescribed schedules, may constrain municipalities' ability to organize policies in a manner that reflects local priorities, growth dynamics, governance structures, and community values. Municipal Official Plans serve as comprehensive, long-range planning instruments that integrate land use, infrastructure, environmental protection, and community building in ways that vary considerably across Ontario. A uniform structure risks oversimplifying these complex planning systems and may diminish the value of Official Plans as strategic, locally responsive policy documents.

The proposed table of contents separates the Planning Framework and Purpose sections from the Land Use Designations, with the Purpose placed at the front of the document. This structure may reduce user-friendliness for readers and applicants by making it more difficult to understand the intent and objectives of specific land use designations. Similarly, policies related to residential ("housing") and mixed-use areas are separated from the corresponding designations rather than being integrated with them, further reducing policy clarity.

As an example, The London Plan has successfully promoted a place-based approach by using a more flexible system of street classification, and could serve as a model for the Province. Instead of applying the same rules everywhere, it

recognizes that streets serve different roles across neighbourhoods—from transportation routes to lively mixed-use areas. This allows for more adaptable planning decisions that better reflect local context. In turn, it supports a wider range of housing options and encourages gradual growth and economic activity along key corridors, while still aligning with community character and supporting complete, resilient communities.

Proposed Land Use Designations

Similarly, the use of standardized land use designations presents practical challenges from both a planning and implementation perspective. Municipalities rely on tailored land use categories to address different development patterns, servicing capacities, economic functions, and land use compatibility considerations. These examples of flexible Official Plans allow for greater intensity and more opportunities for housing and growth, without restricting development to rigid land use designations that limit adaptability.

The proposed designations may limit the ability to respond to fine-grained differences within communities or to maintain long-established planning frameworks that have been developed through extensive public consultation and Council direction. In particular, proposed mixed-use and employment-related designations may introduce interpretation risks and unintended compatibility impacts if local conditions and mitigation mechanisms are not fully accounted for. If staff can confirm that subsections are permitted under the various headings, this approach would provide the needed flexibility while retaining several corporate land use designations that support housing and growth.

Within the Land Use Designations, references are made to singular “Neighbourhoods” and “Mixed Use Areas” designations. While a range of uses is permitted within each, there is little guidance on appropriate density, scale, or built form. This approach does not adequately recognize that there are significant differences between neighbourhoods or mixed-use areas based on individual context. Places like downtowns, historic main streets, urban corridors, quasi-industrial commercial areas, or intensified shopping areas may all be considered mixed-use areas, but require quite different policy direction to perform their intended function. Comparable concerns apply to Rural Lands, where no distinction is made between Rural Neighbourhoods or Hamlets and broader on-farm diversified use areas.

This lack of differentiation also creates challenges from a growth management and infrastructure planning perspective. Without clearer distinctions among land use areas, it becomes increasingly difficult for Engineering and other departments to project population growth, allocate growth appropriately, or size infrastructure such as sanitary sewers, stormwater management facilities, water services, and other municipal systems. Given these implications, staff note that it may be preferable to maintain the status quo wherever possible, while adapting to new naming conventions, rather than adopting a fundamentally altered land use framework.

Parks and Open Space

Additional concerns arise from the separation of “Parks/Open Space” from the Natural Heritage System. In London, the City currently applies a single Green Space designation that includes natural heritage features and associated stormwater management facilities, reflecting a systems-based ecological approach. Under the proposed framework, it is unclear whether neighbourhood parks would need to be removed from Neighbourhoods and assigned to a separate land use designation, potentially disrupting this integrated approach.

The proposal also repeats similar permitted uses across both Rural Lands and Prime Agricultural Areas, including core agricultural activities and on-farm diversified or tourism-related uses. This overlap may create ambiguity and weaken the functional distinction between these land use categories.

Climate Change Policies

Staff also wish to raise concerns regarding the apparent removal of climate change policy requirements. While the proposed changes indicate that Official Plans are no longer “required” to include climate change policies, they do not state that such policies are prohibited. It remains unclear whether municipalities retain the discretion to include climate change policies should Council choose to do so. Given the role Official Plans play in supporting community resilience and aligning growth, infrastructure, and environmental objectives, this discretion is critically important. Related amendments to the Planning Act, including the potential exemption of lower-tier municipalities from conformity with upper-tier Official Plans, further underscore the importance of maintaining local policy integration and decision-making authority.

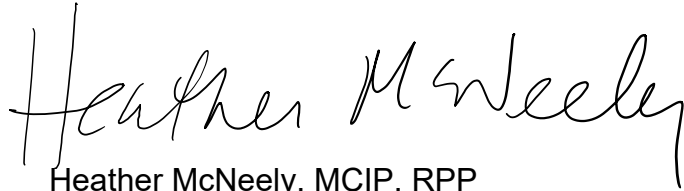
Transition and Implementation

Finally, the implementation and transition impacts of the proposed framework are significant. Updating Official Plans to conform with a standardized structure and land use system will require substantial staff resources, technical analysis, public engagement, and mapping updates. This work would occur alongside other legislated planning obligations, including Official Plan reviews, growth management initiatives, and infrastructure planning, potentially diverting resources from locally identified priorities.

In summary, staff are concerned that a highly standardized Official Plan framework may reduce municipal autonomy, limit responsiveness to local conditions, and weaken the effectiveness of Official Plans as place-based planning tools. While improvements to clarity and efficiency are important, these objectives would be better achieved through flexible guidance, best practices, and optional tools rather than prescriptive structures and land use designations. We respectfully 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.

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 & Development
City of London

cc: Scott Mathers, Deputy City Manager, Housing and Community Growth
Justin Adema, Manager, Long Range Planning