



Canadian Brownfields Network (CBN)  
4243C Dundas Street West, Unit #312  
Etobicoke, Ontario M8X 1Y3  
Phone: (647) 873-5873  
Email: [admin@canadianbrownfieldsnetwork.ca](mailto:admin@canadianbrownfieldsnetwork.ca)  
[www.canadianbrownfieldsnetwork.ca](http://www.canadianbrownfieldsnetwork.ca)

July 20, 2023

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

(Submitted Online via the Environmental Registry of Ontario (ERO))

**Reference: Proposed policies respecting an integrated province-wide land use planning policy document (ERO 019-6813)**

The Canadian Brownfields Network (CBN) appreciates the opportunity to comment on the Ministry of Municipal Affairs and Housing's (MMAH) proposed policies respecting a new integrated province-wide land use planning policy document (ERO 019-6813) adapted from the existing *Provincial Policy Statement, 2020* and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019*. CBN's Development and Government Relations Committees have solicited and compiled comments from interested members for the purpose of making this submission on behalf of CBN. CBN has a diverse membership of site owners, developers, consultants, and industry association representatives who are active in the area of brownfield development within Ontario and across Canada.

CBN is committed to supporting the redevelopment and reuse of brownfield properties. CBN achieves this in part through advocating for regulations and policies that support the remediation and redevelopment of brownfields into productive sites.

The proposed *Provincial Planning Statement (April 6)* contains over-arching changes to land use planning policies in Ontario that have the potential to enable increased greenfield development. A shifting focus to greenfield development may reduce the efforts to develop new housing and economic opportunities within existing urban areas; areas in which brownfields are primarily located. The remediation of brownfields can come with additional costs, time and risks when compared to non-impacted greenfield lands. CBN is concerned that a focus on greenfield development in the *Provincial Planning Statement (April 6)* may result in reduced market demand and uptake of brownfields.

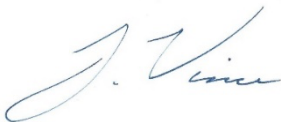
CBN encourages MMAH to consider amendments to the *Provincial Planning Statement (April 6)* to re-establish a strong land use policy framework that accommodates future growth through infill and intensification in existing urban areas. Brownfields have tremendous potential to providing new housing, economic development opportunities and tax generation for the betterment of our cities and the Province.

We would be pleased to discuss these comments further with the MMAH. We thank you for the opportunity to provide our comments and input.

Kindest Regards,



Phillip Caldwell, RPP MCIP  
Co-Chair, Government Relations  
Committee  
Canadian Brownfields Network



Joanna Vince  
Co-Chair, Development Committee  
Canadian Brownfields Network



Krista Barfoot  
President  
Canadian Brownfields Network