



LONDON DEVELOPMENT INSTITUTE

November 30, 2023

Ministry of the Environment, Conservation and Parks
Land Use Policy, Environmental policy Branch

ERO: 019-7636

Dear Ministry Staff,

The London Development Institute (LDI) is a member-based organization representing most land developers in the London area. LDI has been the leading voice on development issues in our city for more than 40 years. Our goal, working with our partners in local government and the community, is to build a better London.

LDI wants to thank the Provincial Government for reviewing the Ontario regulation 406/19 and the Rules for Soil Management and Excess Soil Quality Standards.

LDI is supportive of the proposed amendments with some additional comments for further improvements. The following five suggestions should be considered.

1. A general exemption for the excess soil regulations should be considered for greenfield development sites where agriculture was the last previous use.
2. Allow reuse sites to reuse soil from like project areas to reduce soil being classified as “waste” and sent to landfill.
3. Simplify regulation through less legal jargon, better use of technology through hyperlinks and more visual flowcharts to understand and implement the regulation.
4. Standardize the municipal site alteration process to expediate site alteration permits.
5. Reduce the registration and regulatory process to create reuse of more soil locally which will have a positive environmental impact.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'Mike Wallace'. The signature is fluid and cursive.

Mike Wallace
Executive Director