



April 11, 2022
Our File: ZGO-2

Monteith Brown Planning Consultants
610 Princess Avenue,
London, Ontario, N6B 2B9

Attention: Mr. Eric Steele, BES, Planner

Re: Phased Environmental Site Assessment
Proposed Commercial Development
5310 Leyton Street
Wanstead, Municipality of Plympton Wyoming

Dear Eric:

Further to our discussions, we offer the following discussion, regarding the request for a Phased Environmental Site Assessment (ESA) to support the proposed commercial development of the subject property located at 5310 Leyton Street, in Wanstead. We understand that the property is currently zoned commercial, and the under the proposed development will become commercial use.

Property Background

It is our understanding that the subject property was historically used as residence, general store, and post office. It is also reported that the previous owner had more recently used some of the property to store vehicles outside. At some point, we understand that the Municipality issued by-law compliance orders for the property to have the vehicles removed and the previous owner brought the property into compliance. In our discussions with you, we also understand that municipal staff you had contacted noted that there were no concerns from staff regarding site contamination at the time of the enforcement. Further, we understand that you confirmed that the Ministry of the Environment, Conservation and Parks (MECP) was not contacted with respect to this issue, suggesting there was no evidence of impacts or reportable releases due to the parked vehicles.

Phased ESA Discussion

We understand that through the Planning process, a Phased ESA has been requested. It is our experience that there are several key drivers for the completion of a Phased ESA, and that in this scenario, we would not expect such a request with discussion as follows.

The primary driver through the development process is where there is an increase in land use “sensitivity” and in some cases the regulatory requirement to file a Record of Site Condition (RSC) under Ontario Regulation 153/04. Based on our understanding of the historical property use, with the parking of vehicles, and subsequent conversion to a more intensified commercial contracting yard, we perceive this proposed development to be less “sensitive”, reducing potential liability for use. From the perspective of Ontario Regulation 153/04 (as amended), the property use is going from commercial to commercial (same use designation), and an RSC would not be required.

Another driver to complete the Phased ESAs is to avoid the creation, or severance of portions, of lots that have known, or suspected, environmental impacts. In this case, we understand that the lot exists, and that it is not being severed, and new lots are not being created at the subject property.

A Phased ESA may also be considered where lands are known, or suspected, to be potentially impacted. The driver for the Phased ESA is to avoid issues with the future construction phases that would ultimately prevent the proposed development. Based on the information we have to date, there is no reason to suspect environmental impact that would prevent development. Further, the Ontario Building Code has provisions that prevent the construction of buildings on deleterious soils, providing protection to the Municipality, in the event environmental impacts are discovered on the property.

In our experience, the most common driver for completing Phased ESAs for commercial properties is through the due diligence process, such as through purchase/sale, financing, or internal corporate policy.

In summary, it is our experience that in this relatively low-risk scenario, a Phased ESA is not typically requested at the planning stage. The driver for a Phased in the commercial scenario (if completed) is typically through the due diligence process, such as to support financing, purchase/sale, or to satisfy internal corporate policy.

I trust that this is sufficient for your review at this time. Please do not hesitate to contact me if you have any questions regarding the above noted information, or should you wish to discuss this further.

Yours truly,

GM BLUEPLAN ENGINEERING LIMITED

Per:

A handwritten signature in black ink, appearing to read 'Matthew Nelson', with a long, sweeping horizontal line extending to the right.

Matthew Nelson, P.Eng., P.Geo.