



**Stantec Consulting Ltd.**  
600-171 Queens Avenue, London ON N6A 5J7

January 12, 2023  
File: 161414212

**Attention: Mr. Bruce Page**  
Development Services, City Hall  
300 Dufferin Avenue  
London ON N6A 4L9

Dear Bruce,

**Reference: 1350 Wharncliffe Road South Subdivision – Assessment of Need for an EA**

Further to the proposal review meeting held April 13, 2022, this letter shall serve to evaluate the Municipal Class Environmental Assessment requirements for the Proposed Subdivision located at 1350 Wharncliffe Road South, in London ON.

The following provisions of services to be constructed by 2847012 Ontario Inc. are subject to the above noted condition.

- A. The extension and construction of a local roads (Southbridge Avenue and Street 'A') which is required to provide access to the proposed Subdivision as condition of approval for the plan of subdivision, which will come into effect under the Planning Act prior to the construction of the road extension.
- B. The construction of a sanitary sewer extensions to serve this development. The sanitary sewer servicing the southern portion of this plan will be connected to the existing sanitary sewer stub on Knott Drive at Block 139 (south of proposed Street 'A') constructed as part of Plan 33M-802. Connection to this outlet will require the construction of sewers over lands external to this plan, located within Block 139 of Plan 33M-802, future Street 'A' Extension at Richardson Subdivision. The sanitary sewer servicing the northern portion of this plan will be connected to the future sanitary sewer on Southbridge Avenue constructed as part of Richardson North Subdivision.
- C. The construction of storm sewers to serve southern portion of this plan, outletting to the existing City owned Pincombe SWM facility 3 via internal storm sewer servicing for this plan of subdivision and the existing storm sewer on Knott Drive at Block 139 (south of proposed Street 'A') constructed as part of Plan 33M-802 and overland flow routes of the Richardson Subdivision. Connection to this outlet will require the construction of sewers over lands external to this plan, located within Block 139 future Street 'A' Extension at Richardson Subdivision. The construction of storm sewers to serve norther portion of this plan, outletting to the future City owned White Oaks 3 – West SWM dry Facility via internal storm sewer servicing for this plan of subdivision and the future storm sewer on Southbridge Avenue (east of proposed Southbridge Avenue) constructed as part of Richardson North Subdivision and overland flow routes of the Richardson North Subdivision.



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- D. The construction of a watermain to serve this plan and connect them to the existing low-level municipal system. The watermain to serve this plan will be extended from the existing water main located at Southbridge Avenue to the west and Knott Drive to the south via Block 139 part of Plan 33M-802 and shall be ultimately looped at east limit of Southbridge Avenue with Richardson North Subdivision future watermain. Connection at Knotts Drive will require the construction of watermain over lands external to this plan, located within Block 139 future Street 'A' Extension at Richardson Subdivision

Ontario Regulation 345/93, made under the EA Act, designates private sector developers as proponents of infrastructure projects, however, provides exemptions to such developers to undertake the infrastructure work unless **a private sector developer is proposing an undertaking listed in Schedule C** and the undertaking listed in Schedule C involves the provision of roads, water or wastewater facilities for the residents of a municipality. Using the accepted interpretation that private sector developers are exempt from the EA Act except when projects are listed under Schedule C for residential developments, it is our opinion that 2847012 Ontario Inc. acting as the proponent for the provision of services noted above, being items A through D, would not be subject to the requirements for a Class Environmental Assessment since the aforementioned works would not qualify as Schedule C activities. In our opinion the implementation of these services are considered either **Schedule A or B activities**, in accordance with the following MEA guidelines:

- 1) MEA guideline document page 1-11 item 10,

*"Establish, extend or enlarge a sewage collection system and all works necessary to connect the system to an existing sewage outlet, where it is a condition of approval on a site plan, consent plan, or plan of subdivision or plan of condominium, which will come into effect under the Planning Act prior to the construction of the collection system" and*

- 2) MEA guideline document page 1-15 item 1,

*"Establish, extend or enlarge a sewage collection system and all works necessary to connect the system to an existing sewage outlet, where such facilities are not in an existing road allowance of an existing utility corridor" and*

- 3) MEA guideline document page 1-14 item 1,

*"Establish, extend or enlarge a water distribution system and all works necessary to connect the system to an existing system or water service, provided all such facilities are in either an existing road allowance or an existing utility corridor, including the use of Trenchless Technology for water crossings." and*



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- 4) MEA guideline document page 1-13 item 6,

*"Establish, extend or enlarge water distribution system and all works necessary to connect the system to an existing system, where it is a condition of approval on a site plan, consent plan, or plan of subdivision or plan of condominium, which will come into effect under the Planning Act prior to the construction of the collection system"* and

- 5) MEA guideline document page 1-5 item 23,

*"Construction of local roads which are required as condition of approval of a site plan, consent, plan of subdivision or plan of condominium which will come into effect under the Planning Act prior to the construction of the road"*.

Furthermore, as the 1350 Wharncliffe Road South Subdivision is being developed under the Draft Plan of Subdivision Approval process of the Planning Act, it is our opinion that an Environmental Assessment under the Class EA requirements is not required by 2847012 Ontario Inc for this development. We trust this adequately addresses the aforementioned requirement. Should you have any questions or concerns please contact the undersigned.

Sincerely,

**STANTEC CONSULTING LTD.**



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Development

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