



**ZELINKA PRIAMO LTD**

*A Professional Planning Practice*

August 10, 2020

Chair and Members  
Planning & Environment Committee  
City of London  
300 Dufferin Avenue, 6th Floor  
P.O. Box 5035  
London, ON N6A 4L9

Attention: Heather Lyzynski, Committee Secretary

Re: **Planning & Environment Committee (PEC)  
August 10, 2020, Item #3.6, 2040 River Road**

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On behalf of TRY Recycling Inc., Waste Management Inc., Miller Waste Systems and StormFisher, all of which are companies which manage waste in the City of London, we wish to comment on Application Z-9133 being considered today.

While we do not oppose the rezoning of the subject lands to allow a waste transfer and recycling facility, we are very concerned that this be done in a manner that incorporates the environmental protections that the City has insisted upon in other similar waste handling projects.

Such protections can be incorporated into a zoning bylaw through specific permitted use provisions, and through the use of Holding provisions.

In the current application, the definition used in the Zoning Bylaw Amendment permits a much broader waste operation than what is described in the application materials. For example, it allows the use of the property for transfer of household waste.

Unlike other operations in the City, the bylaw does not require waste transfer to be carried out in an indoor facility. Unlike other City operations, the bylaw does not use a holding H zone to require a system of stormwater collection and testing and connection to the City's stormwater system. Without such requirements, the ZBA does not specifically prevent untested and untreated water flowing over mixed waste to run off and infiltrate to the groundwater system.

It is our understanding that the recent Environmental Compliance Approval (ECA) amendment obtained by Global, and referred to in the staff report, relates to the hauling of waste, and is not an ECA for waste processing and handling facilities at this site.

Typically, the City would make such approval, in accordance with the City and Ministry standards, a condition of the lifting of a Holding provision.

In similar waste management projects, the City has incorporated a high standard of environmental protection into its planning approvals. These considerations appear to be missing in the recommendations for this application. Our clients are also concerned that environmental harm relating to any local waste handling site has the potential to cause damage to the waste and recycling industry as a whole.

We ask that the Committee REFER BACK to Planning Staff Application Z-9133 for consideration of the environmental protections that should be incorporated into the proposed Zoning Bylaw Amendment for this site. We would recommend that such consideration be done in consultation with Jay Stanford, the City's Director of Environment and Solid Waste, who may be able to offer insights and guidance. As well, our clients would be pleased to provide additional details and assistance. They learned of this application only within the past few days.

Yours very truly,

**ZELINKA PRIAMO LTD.**



*For* Richard Zelinka, MES, MCIP, RPP  
Principal Planner

cc. City Council