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August 27, 2025

Mayor, Deputy Mayor and Councillors  
Municipality of Strathroy-Caradoc

**RE: Wastewater Treatment Compliance and Capacity – Mt. Brydges Facility**

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We are writing on behalf of Sifton Properties Limited to express our concerns regarding the ongoing wastewater treatment capacity and operational challenges at the Mt. Brydges Wastewater Treatment Facility, and to highlight the impact these issues will have on the ability of the Municipality to support current and future growth.

As you are aware, an **amended Environmental Compliance Approval was issued on August 29, 2024**, which permits the use of the existing spare tank for flow equalization as well as conversion to an extended aeration treatment process. This spare tank was originally intended to accommodate a future RBC unit No. 3, and its design allowances demonstrate the facility's potential to expand toward a treatment capacity of approximately **1,200 m<sup>3</sup>/day**. Both the River Birch Report, which identifies expansion beyond 825 m<sup>3</sup>/day as possible, and the CIMA+ Report, reinforce that there are practical pathways forward.

While River Birch's approach is recognized as valid in theory, CIMA+ also cautions that there are "substantial risks" in consistently meeting treatment criteria. From the Strategic Priorities meeting on August 25<sup>th</sup>, 2025, it was evident that River Birch can provide add-on solutions in the event ammonia treatment is insufficient. We encourage Council to review River Birch's amended report that confidently addresses CIMA+'s noted ammonia treatment risk.

At the same time, Sifton is concerned with the approach being presented to the community to simply "manage" growth through a servicing allocation policy. In practice, "managing" equates to limiting growth at a time when the current Provincial government is advocating for increased housing supply. The Provincial Planning Statement (PPS), 2024 (Section 2.1.4.b) specifically requires municipalities to maintain **at least a three-year supply of serviced land for residential development**. By the Municipality's own acknowledgement, Mt. Brydges does not currently have this supply. In fact, without reliable treatment capacity, the Municipality effectively has next to **zero serviced supply**. A gross nonconformance to the PPS and one that is likely to garner escalated attention at the Provincial level.

The timelines involved are equally concerning. It is our understanding that the extended aeration conversion requires an **18 to 24 month tender-to-construction period**, and that achieving additional

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capacity through expansion could take **six years or more**. Meanwhile, River Birch has indicated that an interim measure could restore effective treatment to **825 m<sup>3</sup>/day within one year**, with compliance at current flows achievable in as little as three months, subject to ammonia treatment considerations that could be addressed with tertiary processes.

The risk of inaction is significant. Existing development is already at risk, and for the next two years the Municipality is in a precarious position where growth will be severely constrained, despite provincial directives prioritizing housing delivery. Adding to the challenge, the **Master Plan did not contemplate expansion of the settlement area**. The second phase of the Municipality's Official Plan Amendment process, which considers **growth targets, settlement area expansion, and provincial population forecasts — has been stalled for over a year**. These delays compound the uncertainty for developers and residents alike. Sifton will have to consider the risks of investing in a development and community where services and treatment are so uncertain and in a Municipality that has a history of inaction on the matter.

We recognize that members of Council, have expressed concern about the financial implications of advancing a treatment solution, an Environmental Assessment and the need to expand the rate-user base to fund the wastewater treatment solution. Sifton shares the same funding-source concerns. However, **without addressing wastewater treatment capacity, new development cannot proceed** and there will be no opportunity to expand the tax base or collect development charges. This lack of investment risks creating a cycle where housing delivery is stalled, growth targets are missed, and the Municipality falls further behind provincial expectations. By choosing a solution that limits and delays development, the treatment solution will be borne by the tax base through debt interest.

Sifton respectfully urges Council to take decisive action to advance near-term solutions for the Mt. Brydges Wastewater Treatment Facility, while also committing to the expansion or upgrades necessary, via an Environmental Assessment, to secure growth capacity for the short-term, medium-term and next generation. **The environmentally and fiscally responsible path forward is to approve the operational and process upgrades outlined by River Birch while concurrently advancing an environmental assessment for the ultimate wastewater treatment solution.**

We would welcome the opportunity to meet with Council and staff to discuss the challenges facing Forest View, as well as other development opportunities in Mt. Brydges, and to explore ways in which Sifton can assist the Municipality in moving these priorities forward. Thank you for your attention to this critical matter. Sifton looks forward to your leadership in ensuring that Mt. Brydges has the servicing capacity required to support its existing community and to realize its full growth potential.



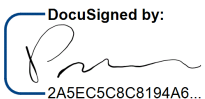
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N.B. After review of the September 2<sup>nd</sup>, 2025 Council Meeting Agenda and associated attachments as released on August 27<sup>th</sup>, 2025, we strongly make the following recommendations:

1. **Refuse award of the EA contract to CIMA+ on the grounds of uncompetitive bid results.** A sole-sourced contract is irresponsible for a study of this magnitude. Engage with a local consultant group to understand why the numerous, qualified firms did not bid. Re-issue the Environmental Assessment RFP incorporating consultant feedback.
2. **The River Birch repair solution must be accepted and implemented immediately.** River Birch are recognized as leading experts in the RBC treatment technology and have been consistently dismissed by this Council going back to 2023 when they were denied delegation to defend their reporting in a public forum. They have provided the fiscally and environmentally responsible solution. Effluent treatment non-compliance must not be allowed to continue. It is unacceptable to continue to pollute the watershed for two years and spend \$14+ million when there is a \$2 million solution that will treat effectively.
3. **Engage with the development community and provincial government regarding approvals, build out timing and growth targets.** Engagement with the development community has not occurred nor are we aware of engagement with UTRCA, LTVCA, indigenous communities and other stakeholders. The PPS 2.1.4.b requires three years of serviced supply. Mt. Brydges has next to zero. Capacity without appropriate treatment is not capacity. The Director's plan is to restrict development through allocation policies and delayed conveyance infrastructure. This approach is a gross contravention of the Provincial Planning Statement.

Sincerely,

**Sifton Properties Limited**

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