

February 22, 2024

Melissa Mohr
Regional Municipality of Waterloo
150 Federick Street, 8th Floor
Kitchener, Ontario
N2G 4J3

C/O Trevor Hawkins thawkins@mhbcpplan.com

Re: Addendum for Region of Waterloo Comments, 777 Laurel Street, Cambridge, Ontario

Dear Melissa,

As requested, HGC Engineering has prepared this addendum to address comments received from the Regional Municipality of Waterloo (RMOW).

Our latest study for this site is titled, “Noise and Vibration Feasibility Study, Proposed Residential Development, 777 Laurel Street, Cambridge Ontario” dated May 12, 2023. We are in receipt of the comments from the RMOW, dated January 9, 2024 and attached as Appendix A, and acknowledge that the bulk of the comments are in agreement with the latest study and do not require a response, with the exception of the following comments, paraphrased below in *italics* with our responses. We also acknowledge that a detailed noise study will be required, to assess the impact of on-site sources of noise on off-site noise sensitive receptors once the comments are addressed to the Region’s satisfaction.

The study notes that impulse noise associated with the trailer loading and unloading area is an impulse noise for the Norwich facility. The study further indicates that the forklift use/activity is a non-impulsive noise source and it is unclear why the forklift is identified as a non-impulsive noise source. Regional staff require clarification relating to this matter. Furthermore, Regional staff require additional information relating to the hitching and unhitching of tractor trailers.

Noted. The Study considered two kinds sounds that are associated with forklifts. The first represents the sound emissions of forklifts moving on site property, which is a steady-noise generated by movement of forklifts, and is represented by the source name “Forklift” in Table VIII of the Study. The second represents the sound emissions of trailer unloading and loading while docked at the loading docks, which uses indoor forklifts that drive in and out of trailers to unload or load material. Based on our experience, such unloading/loading activities using indoor forklifts can generate impulsive sounds as the forklifts drive over bumps when the dock is not perfectly level with the trailer, and as such are assessed in the Study as impulsive sounds, represented by the source name “Trailer Loading/Unloading – Impulsive” in Table VIII of the Study.

Based on site observations, the industrial site to the north does not have frequent trailer hitching and unhitching, and are considered infrequent as per Ministry of Environment, Conservation and Parks (MECP) guidelines. Hitching and unhitching of trailers are typically assessed for warehouse and storage facilities, where tractors trailers frequently access the site to hitch and unhitch trailers, which was not found to apply to this case. As such, these activities were not included in the Study.

In addition, the number of impulses expected during the hour under assessment is also unclear. Based on the 50/45 dBA criteria shown in Table IX, Regional staff assume there are 9 or more impulses per hour.

Noted. The number of impulses per hour was assessed as greater than 9 impulses per hour (as the most conservative case), to account for the impulses of forklifts driving in and out of trailers for unloading and loading of materials.

For the automotive repair facility to the east, the modelling assumes the bay door is open for 20 minutes. Please provide justification for the 20 minute modelling; otherwise, it should be assessed assuming the bay door to be open for the full hour to take into account when doors may be kept open during operating hours in the summer months. Furthermore, no impulsive noise sources have been identified such as pneumatic tools as would typically be expected at such facilities.

Noted. While the overhead bay door can be open for the full 60 minutes in an hour, the active time (i.e. the amount of time in which tools and other noise-emitting activities occur) is not continuous for the whole hour. As such, the bay door was assessed for times it is open and active with a sound power level spectrum representing an open and active state, including sounds from pneumatic tools. In our experience, the sound power levels used is a conservative representation of typical auto repair shops, and has been applied in various applications in the Region for general repair bays with similar time weightings.

Furthermore, the Region has provided comments regarding land use compatibility of the proposed development and the surrounding industries, namely regarding a brewery to the west of the site area, paraphrased below.

Regional staff also note that that there is a brewery located directly adjacent to the subject lands and breweries are Class 3 industrial land uses according to the MECP, D-6 Guideline. Breweries have a recommended setback from sensitive land uses (e.g. residential land uses) of 300 metres. Regional staff requests additional discussion relating to impacts from the Class 2 industrial land uses and the brewery adjacent to the subject lands in accordance with the MECP-D6 Guideline.

As such, a brief discussion on land use compatibility, only in terms of noise, is described below.

MECP Guidelines for Land Use Compatibility and Distance Separation

MECP Guidelines D-1, 'Land Use Compatibility' and D-6 'Compatibility Between Industrial Facilities and Sensitive Land Uses' were prepared to address the potential incompatibility of industrial land uses and noise sensitive land uses in relation to land use approvals under the Planning Act. They recommend that studies be conducted to investigate the feasibility of providing sufficient mitigation when noise sensitive land uses are proposed within the potential zone of influence of an existing industry/commercial facility. The mitigation can be provided at the source, or can be incorporated on the development lands where the industrial/commercial facility is operating in compliance with legislated Ministry requirements.

In planning a sensitive land use near an existing industrial/commercial area, guideline D-6 suggests certain potential zones of influence for the industry, depending on the characterization of that industry. Three classes of industry are defined, as follows:

Class I Industrial Facility

A place of business for a small scale, self-contained plant or building which produces/stores a product which is contained in a package and has a low probability of fugitive emissions. Outputs are infrequent, and could be point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration. There are daytime operations only, with infrequent movement of products and/or heavy trucks and no outside storage.

Class II Industrial Facility

A place of business for medium scale processing and manufacturing with outdoor storage of wastes or materials (i.e. it has an open process) and/or there are periodic outputs of minor annoyance. There are occasional outputs of either point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration, and low probability of fugitive emissions. Shift operations are permitted and there is frequent movement of products and/or heavy trucks during daytime hours.

Class III Industrial Facility

A place of business for large scale manufacturing or processing, characterized by: large physical size, outside storage of raw and finished products, large production volumes and continuous movement of products and employees during daily shift operation. It has frequent outputs of major annoyance and there is high probability of fugitive emissions.

For screening purposes, guideline D-6 outlines some potential influence areas for the different classes of industry, as follows. Outside these potential influence areas, it is unlikely that an industry which has been appropriately classified will have significant impact.

Class I – 70 metres

Class II – 300 metres

Class III – 1000 metres

Guideline D-6 acknowledges that the actual influence areas may be less, subject to site specific studies performed in accordance with guideline NPC-300, “Environmental Noise Guideline Stationary and Transportation Sources – Approval and Planning”. Notwithstanding the actual influence area of an industry, in order to minimize the potential for future land use conflicts, the MECP recommends that certain minimum separation distances be respected, as follows:

Class I – 20 metres

Class II – 70 metres

Class III – 300 metres

The MECP recognizes that these minimum separation distances may not always be viable in certain cases, particularly in those cases of redevelopment, infilling and mixed-use areas, where the zoning or official plan has left no available land buffer. In those instances, the overall feasibility of the proposal is based on the anticipated adverse effects from the industrial use, including any mitigative measures that might be applied to address anticipated impacts. For infill projects or projects located in transitional areas such as the subject lands, the recommended minimum distance setbacks can be reduced, based on the results of technical studies such as this study.



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Compatibility with Adjacent Industries in Terms of Noise Impact

As noted by Regional staff, the subject lands are located in a primarily Class 2 Industrial Land Use area, which has a minimum separation distance of 70 m. It is noted that the proposed development is within the 70 m minimum separation distance from the industry to the north. A technical study of the noise impact of the industry to the north was conducted in the latest Noise Feasibility Study in Section 7, and the results show that the sound emissions of the industry can meet the applicable limits at the proposed development, and that the reduced separation distance is feasible in terms of noise impact.

To the immediate west of the is a small craft brewery (Wave Maker Craft Brewery). Sound emissions from the brewery were not audible at the site area during the site visits on November 17 and 21, 2022 and April 19, 2023, and it is noted that the brewery operations are contained indoors with a small building footprint. There are existing residential dwellings immediately northwest of the brewery, and across Laurel Street approximately 30 m away. Based on the contained nature of their operation and proximity to existing residences, the brewery is not a Class 3 industry. As such, the brewery is not expected to significantly impact the proposed development in terms of noise, and was not considered further in the noise study.

We trust this information is sufficient for your present purposes. If you require further information or require clarification, please do not hesitate to contact us.

Thank you.

Yours truly,

Howe Gastmeier Chapnik Limited

Harry Cai, PEng



Reviewed By

Sheeba Paul, MEng, PEng

Attch:

Appendix A – Region of Waterloo Comments

Any conclusions or recommendations provided by HGC Engineering in this letter/memo have limitations as detailed on our website: <https://acoustical-consultants.com/limitations/>.

Appendix A

Region of Waterloo Comments



ACOUSTICS



NOISE



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PLANNING, DEVELOPMENT
AND LEGISLATIVE SERVICES
Community Planning
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Melissa Mohr 1-226-752-8622
File: C14-60/1/2305
D17/40/1/2305
January 9, 2023

Sylvia Rafalski-Misch
Manager, Development & Urban Design
City of Cambridge
50 Dickson St., P.O. Box 669
Cambridge, ON N1R 5W8

Dear Ms. Rafalski-Misch,

**Re: Proposed Official Plan and Zoning By-Law Amendment
OR05/23
777 Laurel Street
MHBC Planning Inc. (C/O Trevor Hawkings) on behalf of
1455135 Ontario Inc.
CITY OF CAMBRIDGE**

The Region of Waterloo has received a site-specific Official Plan Amendment and Zoning By-law Amendment application for 777 Laurel Street (hereafter referred to as the 'subject lands') in the City of Cambridge for review and comment.

The proposed development includes a total of 1,046 apartment units within multiple buildings, some of which are attached via a shared podium, which will house the majority of the parking stalls. The main entrance to the site is located off Laurel Street, where two seven-storey apartment buildings are proposed (shown as Towers E and F on the Site Plan). Towers A through D are proposed north of Towers E and F and share a 3-storey podium that contains the parking for the residential units. These towers range between 12-14 storeys in height. Indoor and outdoor amenity spaces and a combination of surface and structured parking are proposed as part of the development.

The subject lands are designated Urban Area and Built Up Area in the Regional Official Plan and designated Business Industrial within the City of Cambridge Official Plan and zoned Industrial (M3) Zone in the City of Cambridge Zoning By-law. In order to facilitate this development, an **Official Plan Amendment** is required to redesignate the lands from "Business Industrial" to "High-Density Residential" with a site-specific policy to permit a maximum building height of 14 storeys and a maximum density of 3.0 FSI. Additionally, a **Zoning By-law Amendment** is required to rezone the lands from

the "Industrial - M3" zone to the "Multiple- Residential - RM1" zone with site-specific provisions that will permit an increased building height and density; reduced amenity area; and, a minimum parking requirement of 1 space per unit (0.9 spaces per dwelling unit and 0.1 spaces per unit for visitors).

Regional staff has reviewed the proposed application and offer the following comments for the City's consideration:

Regional Comments

Regional Official Plan Conformity:

The subject lands are located in the "Urban Area" and designated "Built-Up Area" on Map 2 of the Regional Official Plan (ROP). Permitted uses of the Urban Area and Built-Up Area in the ROP include residential uses among others.

Planned Community Structure

The ROP outlines a hierarchy of development based on Strategic Growth Areas, which include Urban Growth Centres, Major Transit Station Areas, Urban Corridors and Urban Nodes followed by gentle intensification within the Built Up Area. The subject lands are located in the Built Up Area.

Section 1.6 of the Regional Official Plan establishes the overview of the Regional Planning Framework and Section 2.B.1 and 2.C establish policies for the Urban System. Section 2.F of the Regional Official Plan establishes policies for intensification targets within the delineated Built-Up Area, which is set at 65% annually for the City of Cambridge. Furthermore, development in the Built Up Area is intended to provide gentle density and other missing middle housing options that are designed in a manner that supports the achievement of 15-minute neighbourhoods. The proposed density will contribute to the achievement of the intensification target in the delineated Built Up Area.

Land Use Compatibility:

Regional staff acknowledge that the subject lands are located in a Regeneration Area within the City of Cambridge and that Regeneration Areas are anticipated to transition from one use to another over time; however, staff note that land use compatibility as per the D-6 Guidelines has not been addressed within the Planning Justification Report. Regional staff note that the subject lands are located in a primarily Class 2 Industrial Land Use area, which recommends a minimum setback of 70 metres between industrial and sensitive land uses. Regional staff also note that there is a brewery located directly adjacent to the subject lands and breweries are Class 3 industrial land uses according to the MECP, D-6 Guideline. Breweries have a recommended setback from sensitive land uses (e.g. residential land uses) of 300 metres. Regional staff request additional discussion relating to impacts from the Class 2 industrial land uses and the brewery adjacent to the subject lands in accordance with the MECP-D6 Guideline.

Railway Association of Canada (RAC) Guidelines:

Regional staff understand that the subject lands are directly adjacent to the Canadian Pacific Railway (CPR) Principal Main Line. The RAC Guidelines recommend a 30 meter setback between the Principal Branch Line and sensitive land use (e.g. residential land uses). Regional staff note that the concept plan shows a 15 meter setback and **Regional staff request that a minimum setback of 30 metres be included as a site-specific provision within the Zoning By-law to ensure new buildings shall comply with the RAC Guideline recommended setback.** In addition, a berm of 2.5 metres above grade with side slopes not steeper than 2.5 to 1 shall be required to be implemented through the detailed design of the site.

Please note that through a future Consent/ Plan of Condominium and/or Site Plan Application, the Regional Municipality of Waterloo shall require an affidavit and report from a qualified Professional Engineer Licensed to practice in the Province of Ontario that demonstrates that the proposed development has been designed in accordance with the Railway Association of Canada's "*Guideline for New Development in Proximity to Railway Operations.*" (Dialog & J.E. Coulter Associated Limited, May 2013).

Region of Waterloo International Airport:

The subject lands are not located within the Airport Zoning Regulation (AZR), but they are within the Runway 14 missed approach and future Runway 32 approaches with a limiting elevation of 487m ASL. Please be advised that no buildings or cranes associated with the construction of this development shall exceed 487m ASL. In addition, the developer shall be required to submit a land use application to Nav Canada.

The application form is located here: <https://www.navcanada.ca/en/aeronautical-information/land-use-program.aspx>

Environmental Threats/ Record of Site Condition

There are known and high environmental threats on the subject lands due to past/historic uses of the site for various manufacturing uses. As a density increase of a sensitive land use has been proposed on the subject lands, a Record of Site Condition and Ministry Acknowledgement letter shall be required for the entirety of the subject lands in accordance with the Region of Waterloo's *Implementation Guideline for the Review of Development Applications On or Adjacent to Known and Potentially Contaminated Sites.*

Since the Record of Site Condition and Ministry Acknowledgement Letter were not received as part of the Complete Application for the Official Plan Amendment or Zoning By-law Amendment, the Region shall require a Holding Provision to be implemented as part of the Zoning By-law Amendment prohibiting the proposed development until the submission of the RSC and the Ministry's Acknowledgement Letter have been received to the satisfaction of the Regional Municipality of Waterloo. The following wording is required for the holding provision:

That a holding provision shall apply to the entirety of the subject lands until a Record of Site Condition (RSC) in accordance with O. Reg. 153/04, as amended, has been filed on the Ministry of Environment, Conservation and Parks (MECP) Environmental Site Registry and the RSC and Ministry's Acknowledgement letter is received to the satisfaction of the Regional Municipality of Waterloo.

Transportation Noise

Regional staff have reviewed the Transportation and Vibration aspects of the Environmental Noise report entitled "Noise and Vibration Feasibility Study, Proposed Residential Development, 777 Laurel Street, Cambridge, ON, dated May 12, 2023", prepared by HGC Engineering and have the following comments regarding transportation noise:

The report indicates that the primary transportation noise sources are King Street East (RR#08) and the Canadian Pacific Railway (CPR) with the Canadian National Railway being a secondary noise source. The report indicated that the CPR railway line is within 75 metre of the subject lands and ground-borne vibration levels exceed CPR limits. Regional staff defer to the rail authority to provide detailed comments on the review of the vibration levels.

The report indicates that acoustical impacts are above acceptable levels and mitigation, including upgraded building components (exterior wall and glazing construction), central air conditioning, the provision for air conditioning and noise warning clauses are required to ensure indoor noise levels do not exceed acceptable levels noted in NPC-300 and NPC-216.

The report indicates that no Outdoor Living Areas (OLA)'s are identified in the proposed development and acoustic barriers are not required, however, the report recommends that the Canadian Pacific Railway clarify if the height of the safety berm and acoustic fence on top of the berm is satisfactory.

The report states that upgraded glazing construction is required for all buildings (except Tower F) and that all dwelling units in Towers A and C and dwelling units on the north façade and living/dining rooms have a minimum STC-34 with the bedrooms providing a minimum STC-40 rating. For all other facades, the living/dining rooms require STC-31 rating and the bedrooms shall have a minimum STC-37 rating. For dwelling units in Tower B, the bedrooms require a minimum STC-36 rating and the living/dining rooms are to meet the Ontario Building Code. For dwelling units in Tower D, the bedrooms require a minimum STC-39 rating and the living/dining rooms shall have a minimum STC-30 rating. For dwelling units in Tower E, the bedrooms require a minimum STC-35 rating and the living/dining rooms are to meet the Ontario Building Code. For dwelling units in Tower F, all rooms are to meet the Ontario Building Code.

The report states that brick veneer or masonry equivalent wall construction is required for Towers A and C as well as the podium adjacent to the CPR. Exterior wall assemblies that meet the Ontario Building Code will provide sufficient sound insulation for all remaining buildings and dwelling units.

Finally, the report recommends the following noise-warning clauses to be registered on title for all dwelling units and Offers of Purchase and Sale, Lease/Rental agreements for the Condominium Declaration (should a condominium be proposed):

For all Dwelling Units in Towers A, B, C, D, E & F:

“Purchasers/tenants are advised that sound levels due to increasing road and rail traffic may occasionally interfere with some activities of the dwelling occupants as the sound levels exceed the sound level limits of the Municipality of the Ministry of the Environment, Conservation and Parks.”

“Warning: Purchasers are advised that the Canadian Pacific Railway Company (CPR) or their assigns or successors in interest has or have a right-of-way within 300 metres from the land the subject hereof. There may be alterations to or expansion of the railway facilities on such rights-of-way in the future including the possibility that the railway or its assigns or successors as aforesaid may expand its operations, which expansion may affect the living environment of the residents in the vicinity, notwithstanding the inclusion of any noise and vibration attenuating measures in the design of the development and individual dwelling(s). CPR will not be responsible for any complaints or claims arising from use of such facilities and/or operations on, over or under the aforesaid rights-of-way.”

“Warning: Purchasers are advised that the Canadian National Railway Company (CNR) or their assigns or successors in interest has or have a right-of-way within 300 metres from the land the subject hereof. There may be alterations to or expansion of the railway facilities on such rights-of-way in the future including the possibility that the railway or its assigns or successors as aforesaid may expand its operations, which expansion may affect the living environment of the residents in the vicinity, notwithstanding the inclusion of any noise and vibration attenuating measures in the design of the development and individual dwelling(s). CNR will not be responsible for any complaints or claims arising from use of such facilities and/or operations on, over or under the aforesaid rights-of-way.”

For all Dwelling Units in Tower F:

“This dwelling unit has been designed with the provision for adding central air conditioning at the occupant’s discretion. Installation of central air conditioning by the occupant in low and medium density developments will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of the Municipality and the Ministry of Environment, Conservation and Parks.”

All Dwelling Units in Towers A, B, C, D and E:

“This dwelling unit has been supplied with a central air conditioning system, which will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of the Municipality and the Ministry of Environment, Conservation and Parks”

All Dwelling Units in Towers A and C:

“This development is located adjacent to the Canadian Pacific Railway Company (CPR) corridor. Noise and Vibration from train operations may occasionally be perceptible and/or audible in the dwelling units.”

As the primary noise source (King Street East) is a roadway under the jurisdiction of the Region of Waterloo, a registered development agreement between the Owner/Developer with the Region to implement the recommendations shall be required through a future condominium or consent application.

Furthermore, prior to the issuance of building permits for this development, the Municipality's building inspector qualified to provide acoustical engineering services in the Province of Ontario are to certify that the recommended noise control measures have been properly incorporated in the building design and plans, and upon completion of construction, a Professional Engineer qualified to provide acoustical engineering services in the Province of Ontario will certify that the dwelling units have been constructed accordingly.

Stationary Noise:

Regional staff have reviewed the stationary noise component of the study entitled, “Noise and Vibration Feasibility Study, Proposed Residential Development, 777 Laurel Street, Cambridge ON” (HGC, May 12, 2023) and have the following response relating to the review of the study:

The noise feasibility study focusses on the stationary noise sources from the adjacent Norwich Plastics facility located to the north of the subject lands and an automotive repair shop located to the east of the subject lands. Both steady and impulsive noise sources were assessed using the NPC-300 noise guideline noise limits for a Class 1 acoustic area; which is satisfactory.

The study notes that impulse noise associated with the trailer loading and unloading area is an impulse noise for the Norwich facility. The study further indicates that the forklift use/activity is a non-impulsive noise source and it is unclear why the forklift is identified as a non-impulsive noise source. Regional staff require clarification relating to this matter. Furthermore, Regional staff require additional information relating to the hitching and unhitching of tractor trailers.

In addition, the number of impulses expected during the hour under assessment is also unclear. Based on the 50/45 dBA criteria shown in Table IX, Regional staff assume

there are 9 or more impulses per hour. **The above points of clarification and further justification shall to be addressed prior to a recommendation being brought forward on the Official Plan Amendment and Zoning By-law Amendment.**

For the automotive repair facility to the east, the modelling assumes the bay door is open for 20 minutes. Please provide justification for the 20 minute modelling; otherwise, it should be assessed assuming the bay door to be open for the full hour to take into account when doors may be kept open during operating hours in the summer months. Furthermore, no impulsive noise sources have been identified such as pneumatic tools as would typically be expected at such facilities. **The above points of clarification and further justification shall to be addressed prior to a recommendation being brought forward on the Official Plan Amendment and Zoning By-law Amendment.**

The noise study further indicates that predicted sound levels for both steady and impulsive sounds during daytime and nighttime periods of the day are shown in Table IX (page 19) of the report. The results indicate the predicted combined sound levels due to the operation of the nearby stationary sources are expected to meet the NPC-300 guideline Class 1 noise level limits at all points of reception. Please be advised that these results may change pending response to the above-noted comments and shall be updated (if necessary) and addressed to the Region's satisfaction **prior to a recommendation being brought forward on the Official Plan Amendment and Zoning By-law Amendment.**

Once the above has been addressed to the Region's satisfaction, a detailed noise study shall be required assess the impacts of on-site noise sources on off-site sensitive uses and on on-site sensitive uses. The stationary noise study shall be implemented through a holding provision within the site-specific Zoning By-law Amendment. The required wording of the holding provision shall be:

That a holding provision shall apply to the entirety of the subject lands until a satisfactory detailed stationary noise study has been completed and implementation measures addressed to the satisfaction of the Regional Municipality of Waterloo. The detailed stationary noise study shall review the potential impacts of noise (e.g. HVAC systems) on the sensitive points of reception and the impacts of the development on adjacent noise sensitive uses.

Furthermore, the following stationary noise warning clause is appropriate and shall apply to all Dwelling Units in Towers A, B, C, D, E, & F and implemented through a registered development agreement with the City of Cambridge and included in all purchase and sale/lease/rental agreement(s) and through a future condominium declaration should a Condominium be proposed. Regional staff shall require the development agreement through as a condition of draft plan approval/condition of approval through a future condominium application or consent application:

“Purchasers are advised that due to the proximity of the existing commercial/industrial buildings, sound levels from these facilities may at times be audible.”

Hydrogeology and Source Water Protection:

Although the subject lands are not located in a wellhead protection area, due to the nature of the existing uses of the subject lands, Regional staff require a geothermal prohibition to be written into the Zoning By-law for this site. The required wording of the prohibition is:

Geothermal Wells are prohibited on site. A geothermal well is defined as a vertical well, borehole or pipe installation used for geothermal systems, ground-source heat pump systems, geo-exchange systems or earth energy systems for heating or cooling; including open-loop and closed-loop vertical borehole systems. A geothermal well does not include a horizontal system where construction or excavation occurs to depths less than five meters unless the protective geologic layers overlaying a vulnerable aquifer have been removed through construction or excavation.

In addition, the Region does not support permanent active or passive dewatering controls for below-grade infrastructure, including foundations, slabs, parking garages, footings, piles, elevator shafts, etc. Below-grade infrastructure requiring dry conditions must be waterproofed.

Finally, a salt management plan shall be required for the future development of the subject lands at the site plan application stage. As part of the Salt Management Plan, Regional staff encourage the proponent to incorporate design considerations with respect to salt management, including:

- Ensuring that cold weather storm water flows are considered in the site design. Consideration should be given to minimize the transport of meltwater across the parking lot. This also has the potential to decrease the formation of ice and thereby the need for de-icing.
- Directing downspouts towards pervious (i.e. sodded) surfaces to prevent runoff from freezing on parking lots and walkways.
- Locating snow storage areas on impervious (i.e. paved) surfaces.
- Locating snow storage areas in close proximity to catch basins.
- Using winter maintenance contractors that are Smart About Salt™ certified.
- Using alternative de-icers (i.e. pickled sand) in favour of road salt.

The proponent is eligible for certification under the Smart About Salt™ program for this property. Completion of the SMP is one part of the program. To learn more about the program and to find accredited contractors please refer to:

<http://www.smartaboutsalt.com/>. Benefits of designation under the program include cost savings through more efficient use of salt, safe winter conditions by preventing the formation of ice, and potential reductions in insurance premiums.

Regional Water Services:

Please be advised that no connection to regional watermains will be permitted in accordance with Section B.2.1.4.1 of the *Design Guidelines and Supplemental Specifications for Municipal Services, February 2023*.

In addition, the Region requires a hydrant flow test or water modelling request to justify show that the existing water infrastructure can support the proposed development to the Region’s satisfaction. **This shall be completed prior to a recommendation being made on the Official Plan Amendment and Zoning By-law Amendment.**

Cultural Heritage:

An Archaeological Assessment was not required for this proposal, however, please be advised that if archaeological resources are discovered during future development or site alteration of the subject property, the applicant will need to immediately cease alteration/development and contact the Ministry of Tourism, Culture and Sport. If it is determined that additional investigation and reporting of the archaeological resources is needed, a licensed archaeologist will be required to conduct this field work in compliance with S. 48(a) of the Ontario Heritage Act; and/or,

If human remains/or a grave site is discovered during development or site alteration of the subject property, the applicant will need to immediately cease alteration and must contact the proper authorities (police or coroner) and the Registrar at the Bereavement Authority of Ontario in Compliance with the Funeral, Burial and Cremation Services Act, 2002 S. 96 and associated Regulations.

Housing:

The Region supports the provision of a full range of housing options, including affordable housing. The Region’s 10-Year Housing and Homelessness Plan contains an affordable housing target for Waterloo Region. The target is for 30% of all new residential development between 2019 and 2041 to be affordable to low and moderate income households. Staff support the provision of affordable housing units on the site as part of this proposed development.

In order for affordable housing to fulfill its purpose of being affordable to those who require rents or purchase prices lower than the regular market provides, a mechanism should be in place to ensure the units remain affordable and establish income levels of the households who can rent or own the homes.

For the purposes of evaluating the affordability of an ownership unit, based on the definition in the Regional Official Plan, the purchase price is compared to the least expensive of:

Housing for which the purchase price results in annual accommodation costs which do not exceed 30 percent of gross	\$418,100
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annual household income for low and moderate income households	
Housing for which the purchase price is at least 10 percent below the average purchase price of a resale unit in the regional market area	\$679,300

*Based on the most recent information available from the PPS Housing Tables (2022).

In order for an owned unit to be deemed affordable, the maximum affordable house price is \$418,100.

For the purposes of evaluating the affordability of a rental unit, based on the definition of affordable housing in the Regional Official Plan, the average rent is compared to *the least expensive of:*

A unit for which the rent does not exceed 30 per cent of the gross annual household income for low and moderate income renter households	\$1,960
A unit for which the rent is at or below the average market rent (AMR) in the regional market area	Bachelor: \$1,075 1-Bedroom: \$1,245 2-Bedroom: \$1,469 3-Bedroom: \$1,631 4+ Bedroom: n/a

*Based on the most recent information available from the PPS Housing Tables (2022)

In order for a rental unit to be deemed affordable, the average rent for the proposed units must be at or below the average market rent in the regional market area as shown above.

Fees:

By copy of this letter, the Region of Waterloo acknowledges receipt of the Official Plan Amendment review fee of \$7,000.00 and Zoning By-law Amendment review fee of \$3,000.00 (Total \$10,000.00) deposited December 15, 2022.

Follow Up:

Based on the above, the following must be addressed to the Region’s satisfaction prior to final comments being provided:

- Additional discussion within the planning justification report relating to compatibility between existing industrial and proposed sensitive land uses as they relate to the MECP D-6 Guidelines is required;
- Additional clarification relating to impulse noise and trailer hitching is required to be addressed within the stationary noise aspects of the noise study;
- hydrant flow test or water modelling request to ensure the existing water infrastructure can support the proposed development

Conclusions:

Once the above has been addressed to the Region's satisfaction, the following shall be implemented:

1. Implementation of site-specific provision of 30 metres for sensitive land uses from the railway.
2. That a Holding Provision shall apply to the entirety of the subject lands until a Record of Site Condition and Ministry Acknowledgement Letter has been received to the satisfaction of the Regional Municipality of Waterloo. The required wording is:

That a holding provision shall apply to the entirety of the subject lands until a Record of Site Condition (RSC) in accordance with O. Reg. 153/04, as amended, has been filed on the Ministry of Environment, Conservation and Parks (MECP) Environmental Site Registry and the RSC and Ministry's Acknowledgement letter is received to the satisfaction of the Regional Municipality of Waterloo.

3. That a detailed noise study will be required and implemented through a holding provision within the site-specific Zoning By-law Amendment. The required wording shall be:

That a holding provision shall apply to the entirety of the subject lands until a satisfactory detailed stationary noise study has been completed and implementation measures addressed to the satisfaction of the Regional Municipality of Waterloo. The detailed stationary noise study shall review the potential impacts of noise (e.g. HVAC systems) on the sensitive points of reception and the impacts of the development on adjacent noise sensitive uses.

4. That a prohibition on geothermal energy systems be implemented within the site-specific zoning by-law. The required wording of the prohibition is:

Geothermal Wells are prohibited on site. A geothermal well is defined as a vertical well, borehole or pipe installation used for geothermal systems, ground-source heat pump systems, geo-exchange systems or earth energy systems for heating or cooling; including open-loop and closed-loop vertical borehole systems. A geothermal well does not include a horizontal system where construction or excavation occurs to depths less than five meters unless the protective geologic layers overlaying a vulnerable aquifer have been removed through construction or excavation.

General Comments:

Please note that any future development on the lands subject to the above-noted application will be subject to the provisions of Regional Development Charge By-law 19-037 or any successor thereof.

Furthermore, please accept this letter as our request for a copy of the decision pertaining to this application. Should you have any questions, please do not hesitate to contact me.

Yours truly,

A handwritten signature in cursive script that reads "Melissa Mohr".

Melissa Mohr, MCIP, RPP
Senior Planner

cc. MHBC Planning (C/O Trevor Hawkins)