



SHAPING GREAT COMMUNITIES

September 26, 2022

File No. 20115

Council
City of Cambridge
50 Dickson Street
Cambridge, Ontario
N1R 5W8

Dear Mayor McGarry and Members of Council:

**Re: Official Plan and Zoning By-law Amendment (OR07/21)
255 King Street West
North Development Corp.**

GSP Group is the agent and planning consultant acting on behalf of North Development Corp. with respect to the above-noted applications for the property at 255 King Street West. Please accept the following commentary in response to correspondence received on September 23, 2022 by Borden Ladner Gervais, on behalf of P&H Milling Group ("**BLG Correspondence**").

The property at 255 King Street West is currently designated as Community Core Area, Preston Towne Centre in the City of Cambridge Official Plan, which permits a broad range and mix of residential, commercial and community uses at higher density.

The property is currently zoned Commercial Residential (C1RM1) in the City of Cambridge Zoning By-law, which already permits a range and mix of residential and commercial uses. The property is also currently subject to a site-specific exceptions pertaining to density, setbacks and parking.

The proposed development of the subject property includes 14-storey tower, 15-storey tower and 16-storey tower atop a podium parking structure with a total of 580 dwelling units and 652 parking spaces. The proposed development identifies a new proposed driveway access on Fountain Street as well as maintains the existing access driveway on King Street West (currently serving the existing residential condominium building at 237 King Street West).

The proposed Official Plan and Zoning By-law Amendments are not introducing sensitive land uses on the subject property. Rather, the proposed Official Plan and Zoning By-law Amendments intend to retain the existing permissions for residential uses on the property while establishing permissions for increased density as well as re-visit the site-specific zoning regulations related to parking and building setbacks. It is our understanding that the existing permissions for residential uses are not considered more sensitive based on intensification; noise assessment and mitigation is based on the principle of the sensitive use and not the intensity of such a use.

A number of technical reports and studies were prepared in support of the proposed development, including the following:

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72 Victoria St. S., Suite 201, Kitchener, ON, N2G 4Y9
162 Locke St. S., Suite 200, Hamilton, ON, L8P 4A9
gspgroup.ca

- Noise and Vibration Impact Study (May 4, 2021), prepared by RWDI
- Traffic Impact Study (May 2021), prepared by Paradigm Transportation Solutions Limited

The BLG Correspondence refers to the Noise and Vibration Study (May 4, 2021) prepared by RWDI, (**"Noise Study"**), stating that it appears that "additional or increased mitigation measures could be necessary" as a result of the proposed development but the "details and sufficiency of such measures are unclear".

Section 3.3 of the Noise Study provides details of the stationary noise assessment completed to ensure the proposed development would not affect any environmental noise permits of surrounding industrial properties and to ensure an adequate sound environment for future residents. This assessment included the review of the existing Environmental Compliance Approval (**"ECA"**) for P&H Milling (ECA #0750-6E7QY7) as issued by the Ministry of the Environment, Conservation and Parks, which indicated on-site mitigation were required and planned for on the P&H Milling property. Stationary-source sound modelling undertaken by RWDI was based on potential noise sources identified through aerial imagery, considerations for the required mitigation associated with the existing ECA for P&H Milling, and previous experiences of RWDI with modelling sound from other flour milling facilities. The potential noise sources identified included trucks, dust collectors, exhaust fans and blowers. Sound levels of these sources were then adjusted to take into consideration existing noise sensitive receptors surrounding the P&H Milling site, including an existing residential dwelling located approximately 50 metres southeast of P&H Milling. The Noise Study concluded that sound levels are predicted to meet the Ministry of Environment, Conservation and Parks Environmental Noise Guidelines D-6 and NPC-300 (**"NPC-300 Guidelines"**).

In accordance with the NPC-300 Guidelines, *noise feasibility studies* are required to confirm the feasibility of proposed development in the context of site design and extent/cost of noise control and mitigation, such as barriers, ventilation requirements and building components; feasibility studies should be reviewed and accepted prior to the adoption of Official Plan Amendments, Zoning By-law Amendments and/or subdivision approval. The Noise Study concluded that the noise impacts on the proposed development and its surroundings are "expected to be feasible to meet the applicable criteria through best practice acoustical design".

The NPC Guidelines further state that the purpose of a *detailed noise study* is to assess the impact of all noise sources affecting development to determine appropriate layout, design and required noise control measures; such studies are typically required as a condition of draft approval or site plan approval. The Noise Study prepared by RWDI recommended that building design and façade construction be further evaluated and reviewed during detailed site design. North Development Corp. will continue to work with the City and Region of Waterloo as part of detailed site plan review and approval with respect to detailed sound assessment and mitigation.

The conclusions and recommendations of the Noise Study have been reviewed and accepted by the Region of Waterloo, the approval authority as delegated by the Ministry of Environment, Conservation and Parks.

In addition to the completion and acceptance of the Noise Study by the City and Region, a Traffic Impact Study and Transportation Demand Management Report (May 2021) was prepared by Paradigm Transportation Solutions Limited (“TIS”). The purpose of the TIS was to assess current traffic conditions, forecast additional traffic generated by the proposed development, analyze traffic impacts on the surrounding road network, and recommend any mitigation measures and/or traffic improvements. The study area included the following intersections:

- Fountain Street and Jacob Street/North access
- King Street West and existing access to 237 King Street (Kressview Springs)
- King Street West and Fountain Street

The TIS contained the following conclusions and recommendations:

- The proposed development is forecasted to generate 154 and 181 new trips during the AM and PM peaks respectively
- All intersections within the study area are forecasted to operate at adequate levels of service at 2026 background horizon
- The following improvements are recommended to mitigate forecasted capacity issues under the 2026 Background and Total traffic conditions:
 - King Street West and south access (existing access for 237 King Street): An eastbound left-turn lane with 15 metres of storage length

The TIS was reviewed and accepted by the City and Region of Waterloo as part of their consideration of the proposed Official Plan and Zoning By-law Amendments. Similar to the Noise Study, details associated with traffic and pedestrian access will be evaluated and reviewed as part of detailed site design. North Development Corp. will continue to work with the City and Region of Waterloo as part of detailed site plan review and approval with respect to traffic impacts and required remedial measures.

The proposed applications for Official Plan and Zoning By-law Amendments were submitted to the City in May 2021 and subject to a formal Public Meeting in September 2021. While it is unfortunate that we are only receiving comments on behalf of P&H Milling at this point in time, North Development Corp. is agreeable to continued dialogue and correspondence with P&H Milling as part of the detailed site plan application and approval process.

We are supportive of the recommendations of Report No. 22-094-CD to approve the proposed Official Plan Amendment and Zoning By-law Amendment. We have worked extensively with the City and Region of Waterloo over the past year and half to address a number of technical considerations, including those related to traffic and noise, and are confident that the proposed development optimizes the opportunity for intensification and investment in the Preston Core Area and will result in the development of a landmark project at this important gateway to the community.

Please don't hesitate to contact me if you have any questions about the commentary above, or if you wish to discuss further.

Sincerely,
GSP Group Inc.

Kristen Barisdall

Kristen Barisdale, MCIP, RPP
Vice President, Planning

cc. Paul Weigel, North Development Corp.
Gillian Redman, RWDI
Rachel Green, City of Cambridge
Katie Butler, Borden Ladner Gervais