

October 27, 2021

Based on our Community Impact Analysis of the proposed developments at 772 and 560 WCB in Appendix 1, JCRA's feedback and questions at this time include:

1. Traffic and noise studies must be current (2021) and reflect 100% operational capacity i.e., 100 % use of tractor trailer bays and available parking spots.
2. Terms of reference for traffic studies to include at a minimum:
 - Egress and ingress, at the site in both directions
 - Capacity of tailbacks
 - Definition of peak hours
 - Vehicle counts at all intersections within a specified proximity to the site that are likely to be used for access to the site
 - Peak hour vehicle counts resulting from the sites' operations
 - Supporting evidence for predicted traffic patterns
3. Terms of reference from noise studies to include at a minimum noise from:
 - Mandatory and/or warning back up beepers on vehicles required to have them or planning to have them
 - Noise level comparison based on municipal standards as well as provincial standards
 - Coupling and uncoupling of tractor trailers
 - Loading and unloading of tractor trailers
 - Idling of vehicles
 - Vehicle movements on the site
 - Garbage and recycling
 - All mechanical equipment on roof top, adjacent to buildings and/or other locations on the property
 - Any anticipated loudspeakers or external (to building) communication systems
 - Vibrations from all on-site activities
4. Can an acoustic map be created that indicates the noise levels on individual near-by residents' properties from different sounds to ensure noise levels are not underreported because of 'averaging'?
5. Will the Town ensure an integrated, external traffic study is undertaken that includes both WCB sites on the Oakville side, 759 WCB site on the Mississauga side, and the Amazon Fulfillment Centre on Avonhead Rd, as well as the container facility on Southdown Road because these tractor trailers also use the same road network?
6. Will the Town ensure an Integrated, external Noise study is completed that includes all the above-noted commercial sites on Winston Churchill?
7. Mitigation of traffic and noise should include reducing the capacity of these sites, including any or all of fewer buildings, fewer tractor trailer bays, and fewer vehicle parking spots
8. Why is storage of tractor trailers permitted on an E2 site?

9. Please identify all acceptable types of goods that can be stored in warehouses permitted by Town E2 zoning and further confirm that no dangerous goods will be stored on-site or transported therein.
10. A physical privacy barrier between commercial sites and the nearby residential properties to ensure permanent separation needs to be built as part of these Site Plan Applications.
11. A pumping station to provide required sewage and sanitary service that is dedicated to all commercial uses on WCB, and any new Beryl Rd sites should be required, NOT a pipe under residential properties. **It is unacceptable to expect residents to bear the burden of providing services required for commercial sites.** Applicants can absorb costs and provide resources required to put in needed services. As well, Halton and Peel can share maintenance costs if the pumping station services sites in each Region.
12. While pollution levels are a provincial responsibility, the Town of Oakville must join with and support residents to obtain an updated Clarkson Airshed Study that includes analysis of anticipated and combined emissions from operations, including diesel emissions from truck traffic, at these new commercial and industrial sites and identifies appropriate mitigation.
13. The Town of Oakville needs to engage with the City of Mississauga to ensure that a holistic and fulsome analysis of traffic, noise, and emissions from all sites is undertaken. Such a study must include road capacity between Lakeshore and the QEW on Winston Churchill, Ford Drive, Beryl, Cornwall and Royal Windsor, Lakeshore Road East/Southdown Rd, all intersections on these streets, and all accessible QEW exit & entry ramps.
14. What consequences are imposed on commercial businesses that violate municipal by-laws, such as noise and traffic restrictions, including speed and types of vehicles? We expect suspension and/or removal of occupancy permits must be included as a consequence to ensure businesses do not ignore municipal by-laws and/or treat financial penalties as a cost of doing business.
15. Are there any similar size warehouse facilities in Oakville or Halton adjacent to R1 residential that can be identified and provide a comparison with respect to noise and traffic generated by these sites, including any other warehouses that are five storeys high and warehouse operations with over 120 tractor trailer bays?
16. 772 Winston Churchill's 50' building height is too high for its proximity to a residential neighbourhood and should be reduced for improved compatibility with the nearby residential area.
17. 772 Winston Churchill's 50' building height is equivalent to a five-storey building. On-line research indicates 36 ft. heights are the norm with some movement to 42 ft. and occasionally 50 ft. However, 50 ft. warehouses are unlikely to be built on spec as they require specialized, high-capacity utilities including power and water for enhanced sprinklers for fire prevention as well as advanced automation and building specifications. It seems likely this is being designed with a specific tenant in mind that is not being disclosed. The Town should require full transparency of potential tenants to ensure accuracy and relevance of SPA supporting documents.
<https://methodarchitecture.com/industrial-clear-height-36/>
<https://renx.ca/demand-technology-fuel-todays-cre-industrial-revolution/>
18. Landscaping that enhances privacy and reduces noise for near-by residents is critical, so this needs to be taken into consideration on landscaping designs.

19. How will these developments impact the Clearview Creek Watershed? Converting natural vegetation to 75% coverage by buildings and pavement will cause increased flooding that will be exacerbated by climate change. We note that a shared storm water management pond is included in the 560 WCB site plan application. However, a comprehensive and integrated storm water management plan must be undertaken for both properties, posted on the Town website and reviewed and approved by Halton Conservation to ensure the rising risks from flooding that results from the increased frequency of 100-year storms are mitigated. The combination of a storm water receptor and a storm water management pond together with other needed flood mitigation controls, such as non asphalt, drainage friendly ground cover in parking areas, are required on the proposed Winston Churchill sites due to the elimination of natural vegetation and drainage and the increased incidence of the 100-year storms and flood levels due to climate change.
20. How will these developments affect Joshua Creek, and will they be incorporated in the current Joshua Creek Flood Mitigation Study? Will changes to the Clearview Creek have an impact on Joshua Creek. Flood risk mitigation must be reviewed with holistic perspective, not as individual water systems.
21. How will the Town address the expected increase in coyotes in near-by residential areas resulting from building massive commercial sites on land that is part of the coyotes' natural habitat?
22. Will these Site Plan Applications be decided at Town Council to ensure residents have an opportunity to delegate their feedback on the applications?

Summary of Estimated Vehicle Movements at 3 newly proposed warehouse developments on Winston Churchill Boulevard

	772 Winston Churchill	560 Winston Churchill	759 Winston Churchill	Total
Total Square Ft.	662,000	640,000	744,900	2,046,900
Tractor Trailer Movements				
Tractor Trailer Loading Bays	117	124	120	361
Total 7 am - 7 pm transport truck round trips based on 5 entrances and 5 exits per truck bay in daytime 12 hours (2 hr. turnaround time)	1,170	1,240	1,200	3,610
Daytime tractor trailer trips per hour	98	103	100	301
Total 7 pm - 7 am transport truck round trips based on 4 entrances and 4 exits per truck bay in nighttime 12 hours (3 hr turnaround time)	936	992	960	2,888
Nighttime Trips per hour	78	83	80	662
Total tractor trailer truck movements per 24 hours	2,106	2,232	2,160	6,498
Employee Vehicle Movements				
Employee Parking Spaces	345	417	450	1,212
Trips in and out per shift during one hour shift change	690	834	900	2,424
Total trips 3 x 8 hr. shifts = 24 hours	2,070	2,502	2,700	7,272
Combined Vehicle Movements				
Total Vehicle trips per hour (Truck + employee) during peak employee shift change hour	788	937	1,000	2,725
Total Vehicle trips per hour (Truck + employee) during peak employee shift change hour every 15 minutes	197	234	250	681
Total Vehicle trips per day (Truck + employee)	5,346	5,974	6,060	13,770
Other				
Trailer Parking Spaces - additional on-site movements e.g. back-up beepers, coupling and uncoupling	86	-	unknown	86
Notes:				
Truck bays for 759 Winston Churchill unknown - 120 estimated based on 40 per building x 3 buildings = 120				
Employee parking spaces for 759 Winston Churchill unknown - 450 estimated based on estimate of 150/building x 3 = 450				

Comments: 772 Winston Churchill & 560 Winston Churchill Blvd.

1. Building size, height and lot coverage are out of proportion for the area adjacent to residential R1
2. Buildings are more that double the size of the very large warehouse at 2175 Cornwall Rd.
3. The number of transport truck loading bays for both 772 and 560 Winston Churchill applications is triple the number at 2175 Cornwall Rd. e.g., 117 and 124, respectively vs. 42 at 2175 Cornwall Rd.
4. There is another new, massive warehouse development on the Mississauga side at 759 Winston Churchill Blvd. that is even larger in size at 640M SF in 3 buildings; 772 WC is 662,000 SF and 560 WC is 745,000 SF.
5. A new Amazon delivery facility has just opened on Avonhead Rd, east of Winston Churchill and south of Royal Windsor. Given its proximity and size, the expectation is that its vehicle traffic will be using the same roads.
6. The JCRA and east Oakville routes to the QEW and to the Clarkson Go Station will be clogged with transport trucks and delivery vans and increased employee vehicle traffic.
7. **Our estimates above indicate 13,770 vehicle trips per day with 6,498 total truck trips and 7,272 employee vehicle trips per each 24-hour day, 7 days per week, 365 days per year.** These numbers do not include the increase in vehicle trips from the new Amazon facility on Avonhead Rd. and new vehicle trips from the property at the NE corner of Winston Churchill and Royal Windsor where an existing factory has been demolished and the property is for sale for redevelopment.
8. Finally, coyotes will relocate from this area into the nearby residential areas or south to the Lakeshore Rd. Park in Mississauga.

Traffic Studies

1. Currently, Winston Churchill is classified as a rural road that cannot accommodate the increased traffic from these new facilities. Even with turning lanes added, tailbacks due to the estimated traffic volumes would completely block the road to other through traffic.
2. Transport truck traffic is not permitted Lakeshore Rd. East between Winston Churchill and Allan.
3. There are already bottlenecks on Southdown Rd. at the container facility, and also at the Ford plant on Ford Dr. A study needs to be undertaken to determine if the transport trucks lined up in the northbound lane on Southdown Rd. to go into the container facility are using Winston Churchill or Avonhead to travel southbound to Lakeshore Rd. East/Southdown Rd.
4. Peel and Halton must commission a combined traffic study to determine whether the existing roadways can accommodate the increased truck and vehicle traffic, including at a minimum analysis of:
 - a. All area intersections to be examined must include increased traffic from these four new development sites, 560 WC, 772 WC, 759 WC, and Amazon on Avonhead.
 - b. Road capacity on Winston Churchill, Beryl, Ford Drive, Royal Windsor, Lakeshore Road East/Southdown Rd. must be determined.
 - c. Examine road capacity, intersections, traffic controls, and turning lanes:
 - i. Winston Churchill and Royal Windsor, as well as northbound on Winston Churchill to the QEW and all entrances and exits on the QEW.
 - ii. Ford and Royal Windsor, as well as northbound on Ford to the QEW and all entrances and exits onto the QEW.
 - iii. Ford and Upper Middle Road route to the HWY 403 eastbound.
 - iv. Both Royal Windsor westbound onto the QEW westbound and Royal Windsor eastbound from the eastbound QEW (should also be considered in the context of expected midtown road construction plans).
 - v. Winston Churchill and Beryl, and Beryl/Cornwall and Ford intersection.
 - vi. Determine the impact on traffic, noise and the airshed. Should Amazon become a tenant of one or both of the proposed new warehouse sites on Winston Churchill, it will create a cluster of warehouses and a delivery station all within this area. Amazon is known to create such clusters elsewhere.

5. Reconfirm to developers and future tenants that truck traffic is prohibited on Lakeshore Rd. East into Oakville from Winston Churchill and on Ford Drive between Lakeshore Rd. East and Cornwall. Require that they provide predicted road use patterns for all vehicles entering and exiting their commercial sites.
6. Standalone traffic studies required for each SPA are insufficient for determining what restrictions or reductions are required by each site. Integrated traffic and noise studies for 772 and 560 WCB, 759 Winston Churchill, Amazon on Avonhead, the container facility on Southdown Rd. and other nearby commercial activities must be undertaken and included in the Town of Oakville responses.
7. Ensure all traffic studies include total 24 hour and peak trips by transport truck, delivery vehicles, and employees' vehicles into and out of all of the proposed new facilities plus existing truck, car, bike and pedestrian traffic on the area road network.

Air Quality – Clarkson Airshed:

1. The Clarkson Airshed is already overtaxed by the cement plant, the lubricants plant, and other industrial uses in the area. Significant increases in transport truck traffic will increase the particulates from diesel fuel in the air impacting the health of residents in east Oakville and west Mississauga.

Noise:

1. Tenants are unknown at this time, so no operational information is available
2. Size & Operations – a noise study is neither complete nor accurate without knowledge of operations
3. Hours of operation – 24hrs
4. Back-up beepers – have not been included in noise study for 772 WCB per the study comment that “provincial guideline and criteria do not exist for these sounds”. In the absence of provincial guideline, municipal standards apply. Are there varying sound levels on back up beepers?
5. Sound sources to be included at a minimum:
 - a. Back up beepers
 - b. Rooftop mechanical
 - c. Loading and unloading operations
 - d. Coupling and uncoupling
 - e. Garbage collection at rear of buildings
 - f. Idling of vehicles (How can the 772 Winston Churchill Traffic Study assume that trucks don't idle on property?)
 - g. Vibrations are ignored in the Noise study, but the tenant is not known so this assumption cannot be made at this time.
6. Without tenants, these new buildings need to be designed to the highest level of noise mitigation including very high noise walls that meet the highest levels of noise mitigation especially back-up beepers and as well as vibration mitigation.

Landscaping:

1. The 772 Winston Churchill 50' building height is too high. It is equivalent to a 5-storey building. This may be designed with a specific tenant in mind that is not being disclosed. Most warehouses are below 36 ft. high. What tenants require 50' ceiling heights?

On-line research indicates 36 ft. heights are the norm with some movement to 42 ft. and occasionally 50 ft. However, 50 ft. warehouses are unlikely to be built on spec as they require specialized, high-capacity utilities including power and water for enhanced sprinklers for fire prevention as well as advanced automation and building specifications.

<https://methodarchitecture.com/industrial-clear-height-36/>

<https://renx.ca/demand-technology-fuel-todays-cre-industrial-revolution/>

2. What is the maximum size and height permitted building height for an E2 warehouse adjacent to R1 residential?
3. Landscaping should include evergreen trees to the west to provide a year-round screening of the facility including a secure noise wall to prevent employees from exiting into Aspen Forest Park or local residential areas.
4. Building heights should be reduced to be more compatible to the adjacent residential area.

Climate Change:

1. The proposed developments should also be viewed through a climate change lens
2. Lot coverage including paved spaces is about 75%. The asphalt parking and driveway areas plus large, oversized building are not environmentally friendly.
3. The reduction in green space will contribute to increased carbon in the atmosphere, rising temperatures, increased pollution in the Clarkson airshed and potentially local flooding and changes to the watershed.
4. Driveways should be permeable to allow water to drain through. The sites have been open grassland areas that have absorbed water run-off into the area watershed.

Conclusion

1. There are too many unknowns at this time to proceed with SPA approval.
2. Area traffic study must include all of the proposed new facilities and future developments or redevelopments in the area.
3. Future tenants are unknown, so traffic studies need to meet very high standards to protect area residents and existing businesses from road networks inadequately designed to accommodate a significant increase in traffic. Winston Churchill will not be useable if transport trucks are backed up on this two-lane road to enter the new warehouses.
4. It is imperative that Winston Churchill Rd. south of Beryl be upgraded to a 4-lane municipal road. Ideally an internal two-lane road should be built within the property lines of these facilities and routed to a signalized light to control left hand turns onto Winston Churchill. Southbound right hand turns into the facilities would also utilize a 2-way road within the property lines to move traffic off Winston Churchill. The extra lane on the 4-lane road could then function as a buffer for tailbacks from the entrance to the warehouse property, with the other lane open to through traffic. Northbound left turns into the facilities would also need the extra lane for the same reason.
5. Redevelopment of Winston Churchill must also include a new pumping station and sanitary sewer to accommodate these new facilities. The cost would be shared between Halton and Mississauga, and it would be designed to accommodate future developments in the area.
6. Similarly, without tenant operational information noise studies must meet very high standards to protect nearby residents including noise walls and security to fully separate these industrial facilities from the surrounding residential area.
7. Building heights must be reduced due to proximity to residential neighbourhoods and landscaping plans must include site screening features.
8. Lot coverage must be reduced to allow more water to enter the watershed naturally and allow landscaped vegetation to continue to co-exist with these new facilities.
9. The Clarkson Airshed study must be updated to assess the impact of the new developments and mitigation solutions identified and/or the projects scaled back.