

October 12, 2023

**BY EMAIL ([clerks@vaughan.ca](mailto:clerks@vaughan.ca)) & REGULAR MAIL**

Vaughan City Hall  
Office of the City Clerk  
2141 Major Mackenzie Drive, Level 100  
Vaughan, Ontario  
L6A 1T1

Attn: Mr. T. Coles, MCIP, RPP, City Clerk

**Re: 20 Roysun Road - Co-Mart Holdings Ltd.  
Official Plan Amendment – File No. OP.21.027  
Zoning By-law Amendment - File No. Z.21.056  
City of Vaughan  
Our file: 1711-23**

We are planning consultants writing on behalf of NAPCO - Royal Building Products ('NAPCO-Royal'), a Westlake Company. The NAPCO-Royal pipe manufacturing business is located at 101, 131 and 155 Regalcrest Court, where 20 Roysun Road is located to the east. As a long-standing and established manufacturing firm, we continue to monitor all land use changes in the vicinity that may pose future concern.

The Provincial Ministry of the Environment and Climate Change ('MOECC') - *"Environmental Noise Guideline, Stationary and Transportation Sources - Approval And Planning"* (publication 'NPC-300') guides municipalities and proponents of development. New Class 4 areas are provided to facilitate urban intensification and/or areas of redevelopment with nearby potentially noise sensitive and noise producing land uses.

NPC-300 has been designed to support the *Planning Act* and the Provincial Policy Statement, 2020, as well as the Environmental Guideline D-1 "Land Use Compatibility", etc. The value of a Class 4 area is a general relaxation of sound measurement limits by increasing the sound level limits to be applied to support higher noise level limits, such as those associated with industry, urban intensification which affect sensitive land uses.



NPC-300 affirms the responsibility of 'proponents of a new noise sensitive land uses' ... to ensure compliance with the applicable sound level limits and for these responsibilities to be reflected in land use planning decisions. The proponent's responsibilities include, but are not limited to:

- *determining the feasibility of the project;*
- *assessing outdoor and indoor acoustical environments, as appropriate;*
- *investigation of feasible means of noise impact mitigation;*
- *ensuring that the required noise control measures are incorporated into the development, and; (5) describing the technical details, and clarifying the responsibility for the implementation and maintenance, of the required noise control measures.*

This means that a proponent of a new noise sensitive land use bears responsibility for proposals that are to be located near land uses generating noise as part of their industrial operations, per planned functions, as an existing, lawfully established stationary noise sources.

Introducing new noise sensitive land use, such as Roysun Road, has the potential to be a limiting factor to existing and future industrial activities, particularly where Environment Compliance Approval (ECA) may be sought to support industrial activities. In this case, Acoustic Assessment Reports, Audits and Noise Abatement Action Plans are potentially required which increases costs, processing time and this may compromise the issuance of a required ECA for the industrial or commercial facilities to function and/or expand activities where noise is a by-product of operations. An ECA is used for enforcement of noise excesses, and used to manage complaints to the MOECC, or through the City of Vaughan's municipal noise bylaw enforcement.

How has the City of Vaughan taken NPC-300 (Class 4) into consideration for this proposal?

Please ensure our firm remains on the City's mailing list regarding any future public notices, updates, reports, Committee of the Whole and Council Agenda related items, and any Council decision or actions on the above captioned matter. Thank-you in advance for your co-operation.

Yours truly,

Pound & Stewart Associates Limited



Philip J. Stewart, MCIP, RPP

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cc. Ms. R. Roach, Planner, City of Vaughan ([rebecca.roach@vaughan.ca](mailto:rebecca.roach@vaughan.ca))

cc. client

cc. Miller Thomson LLP

POUND & STEWART ASSOCIATES LIMITED

