

January 19, 2023

GSAI File: 542-003B/542-003C

City of Brampton
2 Wellington Street West
Brampton, ON
L6Y 4R2

Attention: Mayor and Members of Council

RE: City-Initiated Amendment to the Zoning By-law
Report No. Planning, Bldg & Growth Mgt-2024-064
Interior Garage Space Zoning Standard

Glen Schnarr & Associates Inc. (GSAI) are the Planning Consultants for Block 47-1 Landowner Group Inc., and Block 47-2 Landowner Group Inc. (collectively the 'Landowner Group'). On behalf of the Landowner Group, we are pleased to provide this Comment Letter in relation to the 'City-Initiated Amendment to the Zoning By-law' which was presented to the Planning and Development Committee on November 20, 2023.

For context to this Comment Letter, through its Procedural Order, dated October 20, 2020, the Local Planning Appeal Tribunal (now the Ontario Land Tribunal) approved a settlement for the Block Plans for Area 47-1 and 47-2 as well as a corresponding Official Plan Amendment to the Highway 427 Industrial Secondary Plan (SPA47). Following the OLT's approval of the Official Plan Amendment, GSAI has been actively working with landowners on advancing site-specific Rezoning and Draft Plan of Subdivision applications to facilitate the complete community as planned and envisioned through the comprehensive Block Planning process. The submission and review of site-specific Draft Plan of Subdivision and Zoning By-law applications were an important milestone that followed an extensive planning review process that involved the City of Brampton, the Region of Peel, Toronto and Region Conservation Authority and other commenting agencies.

We understand City staff are advancing a City-Initiated Amendment to the Zoning By-law to assist with the interpretation and application of the Zoning By-law and help reduce the number of minor variance applications. Included in the proposed amendments is an amendment to Section 10.5 (c) of the Zoning By-law to increase the minimum interior length and width of residential garages, more specifically, we understand City staff are proposing to increase the minimum interior space of a garage from the current standard of 2.7m by 5.4m to 3.3m by 7m, on the basis that the *"increased garage size will accommodate a functional parking space and storage for waste bins while also enhancing residential streetscape"*.

On behalf of the Landowner Group, we offer the following comments and observations dealing with the 'City-Initiated Amendment to the Zoning By-law' dealing with interior garage space:

- Through the review of Rezoning and Draft Plan of Subdivision applications in Area 47-1 and 47-2, City staff have accepted a minimum garage standard of 3.1m by 6m for a single car garage (see attached demonstration plan). This dimension was deemed to be a "functional" garage standard and formed the basis of a minimum standard that would be applied to Area 47. This standard has been adopted by City Council through its approval of By-laws 219-2023 and 218-2023. The proposed 3.3m by 7.0m minimum requirement is excessive and inconsistent with what was accepted and approved in Area 47.

We recognize a minimum garage dimension of 2.7m by 5.4m may be challenging; however, City staff have satisfied themselves that a functional garage can be accommodated by way of 3.1m by 6.0m. We appreciate *Planning Act* applications are reviewed on their own merits and that consistency is required on how minimum garage templates are applied throughout the City; however, the proposed minimum standards in the City's housekeeping Zoning By-law are in excess of what has been discussed with the development industry on *Planning Act* applications.

- The City's presentation states the proposed increase in the garage dimension to accommodate storage for waste bins. It is important to note that the Region of Peel's 'Waste Collection Design Standard Manual' (2020) states that garbage storage can be provided in the garage, backyard, or side yard for storage carts, with direct access to the collection point location. Increasing the garage length to 7m predetermines that an applicant must provide waste storage within a garage whereas the Region's standards allow for flexibility in where waste storage can be accommodated. It is our opinion that excessively requiring a 'minimum' standard for interior garage space does not negate or resolve occupant's action to ensure garage bins are put out on street on the garbage pick-up date and relocated back into the garage afterwards – this seems to be enforcement issue that does not necessarily get resolved simply by making the minimum interior garage space significantly larger than what is really needed.
- The City of Brampton's Development Design Guidelines state that "*garage widths shall be a balance within the proportions of the house and lot width they serve. To avert negative impacts on the streetscape, large garages on narrow lots are to be avoided.*" It is our opinion that the proposed 3.3m by 7.0m minimum requirement could result in disproportionate streetscape design for residential units whereby the streetscape is dominated by the garage width. The proposed amendments could create challenges with facilitating compact built forms and affordable housing since livable space will be taken up by larger garages to accommodate convenient storage and movement of garbage bins.

The current staff proposal to increase the interior garage space from the current minimum of 2.7m by 5.4m (14.58m² or 157sf) to 3.3m by 7.0m (23.1 m² or 248.6 sf) is almost 60% increase in the minimum interior garage space requirement. This would result in the removal of 8.52m² (91.7 sf) of living space on every unit. **This is basically equivalent to a loss of a bedroom on each unit.**

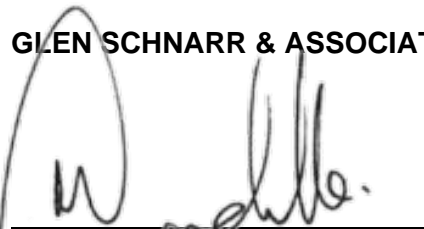
On behalf of the Landowner Group, we recommend that the existing provision, Section 10.5 (c) “*the interior space of a garage shall have a rectangular area not less than 2.7 metres by 5.4 metres with no more than one step encroachment*” be revised to reflect **3.1 metres by 6.0 metres**, which has been demonstrated by the proponents, accepted by City staff and approved by City Council in the Block 47 areas. This would ensure that these amendments do not create unintended consequences of compromising appropriate streetscapes that is not dominated by the garage width and not impacting the delivery of affordable housing.

We also respectfully ask that the City apply appropriate grand-fathering to those planning applications in process that the current Zoning By-law standards apply and that the increase in the minimum garage standard greater than what is currently in the Zoning By-law be assessed and required on a site by site case and circumstances.

Thank you for the opportunity to provide these comments. We respectfully request that our comments be considered by City Staff in formulating any final recommendations to City Council on this matter. We would be happy to meet with City Staff and discuss our comments.

Respectfully submitted,

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