

July 11, 2024

Committee of Adjustments
City of Brampton

Re: Application A-2024-01-09, 227 and 229 Main Street South

We live in a stable residential community, and have been actively involved in ensuring that the intensification that occurs around and within our community, enhances the vibrant neighbourhood that we enjoy.

The current Minor Variance Application regarding 227-229 Main St S. is inappropriate, and does not satisfy the tests as laid out in the planning act.

1. The changes the proponent requests are not minor in nature, whether you look at individual parameters, or the total environment, the application requests major changes with major impacts.
2. The changes are not desirable for the development. The changes would take away the connection to the community to the publicly accessible "Bowling Green", that had significant landscape amenities, and replace it with 28 townhomes and a dog run.
3. Does not comply with the intent of the Zoning By-Law, which was particularly crafted to meet the transitional needs of this property.

The community has worked with many developers, have contributed positively to the Amica development, and the planned development at Bartley Bull, Shoppers World, and the Hurontario LRT. We do seek planning advice, and try to make suggestions and recommendations to make Brampton communities stronger.

Whether you look at the individual requests within the proposed variance, or the totality of the requests, we trust that you will agree that they are not minor in nature.

Below is a table, that shows the correlation of the existing attributes in the community, the By-Law for a recently completed Retirement Apartment Building abutting the property, the existing by-law and for the variance requested. Some of these requests were in the original application, and specifically denied by City of Brampton planning staff.

	Abutting Community By-Law (Existing)	Abutting Retirement Home Apartment By-Law (Existing)	227-229 Main St S By-Law (Existing)	227-229 Main St S Variance Request (Proposed)
Maximum Height	10.6 m	40 m, firm requirement that no portion shall break the 45° angular plane	Towers up to 76 m with no 45° angular plane exceptions (specific language inserted that this restriction applies to "All portions of a building")	Towers up to 80 m and breach of 45° angular plane is permitted

Rear Yard Depth	7.5 m	Minimum 10.5 m to 20 m based on building height where there are no direct residents behind, majority of building has rear set back of 45m from residential lot lines as per Urban Design Brief supported by City of Brampton	25 m – 30 m based on building height	6.0 m abutting residential homes
Gross Floor Area	n/a	unavailable	39,000 m2	48, 000 m2
Floor Space Index	n/a	2.5	3.0	7.62
Landscaped Open Space	50% (60% for corner lots)	By-Law approved at 50%, By-Law Amendment after additional consultation with residents to discuss site plan and additional changes, and reduced to 30%	35%	24.9%
Lot Coverage	n/a	32%	??	82.46 % -47.12% Building -17.28% Driveway -18.06% paved (actual landscaped area 17.54%)
Resident Parking	n/a	0.45, based on compact form of building and retirement residence	0.38	0.2
Visitor Parking	n/a	Included above	0.2	0.15
Tower Separation	n/a	n/a	20 m	25 m
Podium Height	n/a	n/a	27 m	41 m

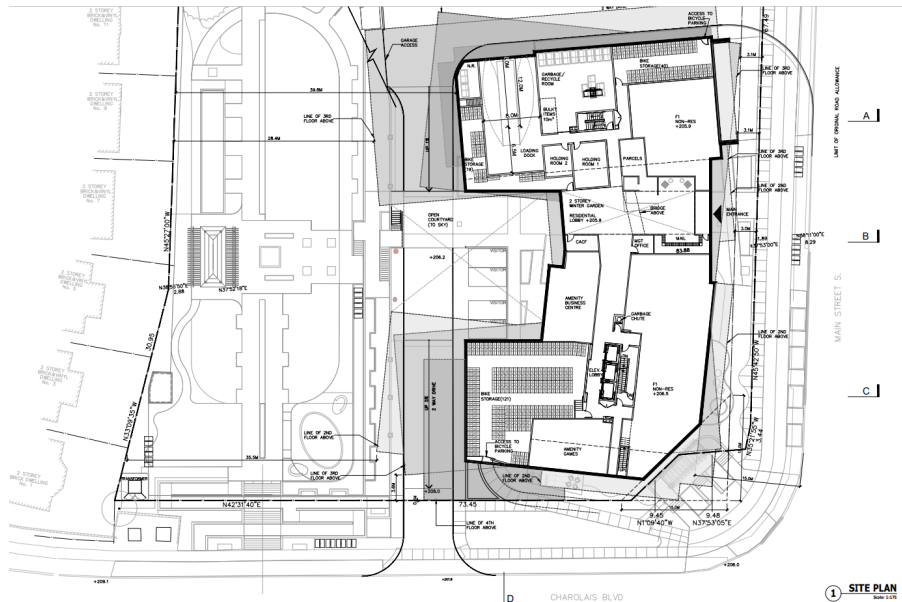
Some of these exact matters, such as the tower separation distance request, was specifically dealt with by Planning staff previously.

Tower Separation & Wind Impacts

As you can see from the figure below, the distance between the two towers in the original application is about 21 m, the roof terraces may be a bit closer. The City of Brampton rejected this separation distance, and increased the minimum distance to 25 m. The proponent now asks to remove this condition for the Zoning By-law, and replace it with an even smaller separation.

A 25m separation was required by the City in their recommendation report, dated Dec 30, 2022:

“An increase in tower separation distance that will improve privacy for the proposed apartment units, and also reduce shadow, wind and visual impacts to the low-rise dwellings on Hodgson Street”



All these items, shadow, wind, and visual impacts are significantly important to the local community. For example, the Brampton Urban Design Review Panel identified that the proponent’s design team should consider the microclimate conditions. The report states “uncomfortable and potential unsafe” wind conditions will exist, which the residents understand is why the City ensured a 25m tower separation.

Although we could continue to look at individual issues, let’s move to looking at some of the totality of the changes.

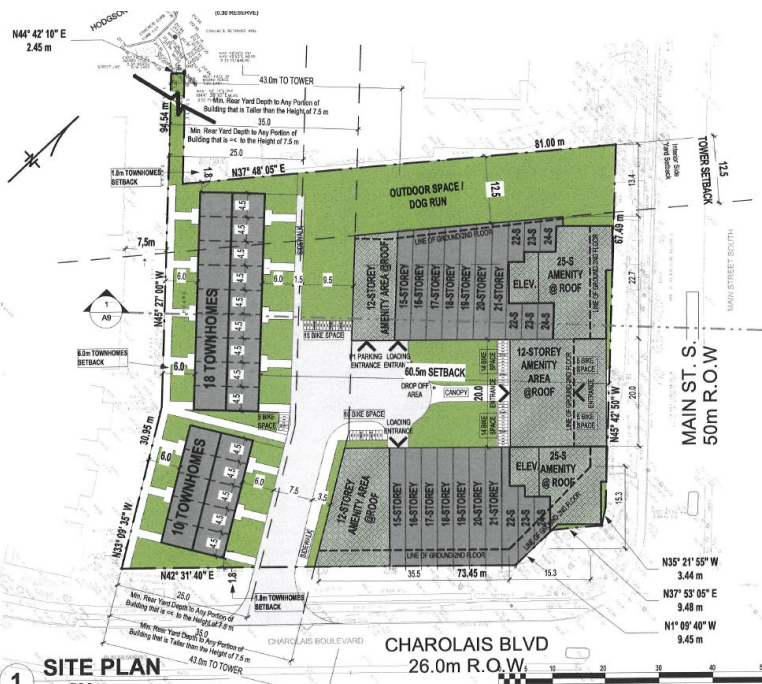
Public Realm & Green Space Amenities

With regard to the overall environment, please compare the two figures below:

Existing By-Law includes green space and is connected with the community:



The proposed variance, below, creates a closed community, without any public green space amenities, other than a dog run.



As part of the approval process, the proponent loudly proclaimed the development's landscape relationship to the Public Realm, for example in the Urban Design Brief they described this portion of the development as follows:

2.2.3 The *Bowling Green*

The Green is designed with an abundance of informal landscape amenity, suitable for casual gathering and a tot lot, with potential for organized games complete with lawn bowling/bocci court size lawns. A 'croquet' pavilion anchors the centre of the Green, with playground and gardens to the south complete with a water runnel and shallow pond. Along the centre of the Green is a row of high branching deciduous trees aligned with a central walkway complete with benches and moveable tables and chairs in permeable pavement. The perimeter of the space provides for casual strolling and sitting beside garden areas populated with pollinator species and flowering shrubs. The west side of the green is heavily planted with a mix of deciduous and coniferous trees to provide separation and scale to the residential neighbours to the west.

The north end of the Green provides connection to paved linkages out to Main Street and the Hodgson Street cul-de-sac and parkland to the north.

The addition of the townhomes, and the replacement of public realm amenities with a dog run, does not connect the development with the rest of the neighbourhood, and disconnects it from the public realm.

The back-to-back townhomes are also a new request, as townhomes are not permitted under the by-law. Townhomes, and back-to-back townhomes, would be a significant new permitted use that can only be properly addressed through the development application process. The townhomes are precisely where the "Bowling Green" was supposed to be. How can anyone look at that and say that is not a significant impact to the development?

The streetscape in front of Main Street has also been impacted, from two rows of trees, cycling lanes and a pedestrian boulevard, to what looks like to me a regular sidewalk.

Height Restrictions

The height restrictions (along with building mass, skyview, privacy, and traffic) were a key issue throughout this process. The Planning and Development Committee Understood how critical this was to ensure a proper transition to the community. Accordingly, at their January 23, 2023 meeting, it is minuted:

"Committee questioned why the guidelines regarding the 45 degree angular plane did not meet the criteria and suggested that the report be referred back to staff for further consideration on the concerns expressed on this feature.

Staff advised that 45 degree angular plane is only a guideline.

Committee introduced a motion to refer the report back to staff to ensure the project meets the 45-degree angular plane guideline...."

The By-Law was then drafted to specifically include the following height restriction:

All portions of a building must be located within the height limits set by a line that extends upwards at a 45 degree angle, or lower, from the rear property line to a maximum height of 76 metres

Breaching the 45 degree angular plan, or exceeding 76 metres will have a significant impact on the surrounding neighbourhood. This is already more than double the size of any surrounding building, it should not “inch up” any more.

Traffic

Under the existing by-law, traffic is already marginal, impacting a Level of Service “E” (the 2nd lowest level of service) at Main Street South and Charolais (and other intersections). How do the additional units impact traffic?

Table 12: 2029 Future Total Level of Service

Intersection	Control	Peak Hour	Level of Service ¹	Control Delay	Maximum V/C Ratios ²	95 th Percentile Queue Length > Storage Length?
Main Street South and Charolais Boulevard	Signal – Ext.	A.M.	E	56.7s	1.00 (SBT)	147.6m > 60.0m (NBL)
		P.M.	E	69.6s	1.63 (NBL)	132.4m > 60.0m (NBL)
	Signal – Opt.	A.M.	E	56.6s	0.92 (SBT)	152.9m > 60.0m (NBL)
		P.M.	D	50.3s	0.96 (SBT)	128.3m > 60.0m (NBL)

Parking

Overflow parking onto Hodgson Street has always been a concern. The reduction of available parking, combined with the increase of units, will lead to a significant impact on overflow parking on the street behind the development, Hodgson Street.

Summary

There is no impediment to developing the property, as the site-specific by-law is currently written.

Whether it is the more than doubling of the FSI, replacing public realm space with townhouses, or increasing the height of the building to 80m, this variance creates a substantially different development, with significant impacts on traffic, wind, sightlines, skyview, and should be denied. If the proponent now desires an entirely different development, then they should re-submit a new development application.

I give my authorization to post this letter on the agenda of the Committee of Adjustments Meeting, redacting my private information, if possible, (e.g., email address or mailing address) on publicly available sources.

Regards,
Tony Linardi
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