

Mr. and Mrs. Snyder

Planning and Development Committee

Attn: **Ms. Yin Xiao**,

Development Planner

Planning & Development Services Dept.,

2 Wellington St. W.,

3<sup>rd</sup> Fl.

Brampton, On. L6Y 4R2

Re: Opposing the application by *Sunfield Investments (Church) Inc. – Weston Consulting* to amend the Official Plan and Zoning By-law at **172 Church St. E.**, Ward 1

City File No.: **OZS-2020-0026**

Dear Ms. Yin Xiao, Planning & Development Services Department of the City of Brampton and City Council:

We wish to make you aware of a number of strong objections that we have with regards to the application by *Sunfield Investments (Church) Inc. – Weston Consulting* to amend the Official Plan and Zoning By-law at **172 Church St. E.**, Ward 1, application City File Number referenced above. As long-time residents of Brampton and one of the close neighbours to the site of the proposed development, we are in the view that the proposed amendment of the Official Plan and Zoning By-law will have a serious negative impact on the area's standards of living. Our specific objections are as follows:

#### **1. Need to avoid city cramming**

We believe that the proposed application and development are a direct contravention of the City's and Council's intent and objective to evaluate potential amendments of the Official Plan and Zoning By-law applications against criteria such as conformity with the official plan and compatibility with adjacent uses of land.

*Sunfield Investments (Church) Inc. – Weston Consulting* proposes to amend the existing By-law to allow them to build a high density project (91.8 units per net hectare), which would consist of 27 townhouse units, 24 of them – stacked back-to-back units, accompanied by an underground and at grade 38 parking spaces, 30 of which are for the residents and 8 for their visitors, all with one (1)

access to a busy Church St. E., immediately surrounded by low density, single family dwellings in the established central area of Brampton.

The lot at 172 Centre St. E. was previously occupied by a single family use dwelling intended for historical designation.

**2. Land Use Strategy. Suitability of the land for the proposed purpose due to the lot's size and the nature of the surrounding properties.**

We consider that the proposed amendment of the Official Plan and Zoning By-law contradicts the criterion of the suitability of the land for the proposed purpose.

A City Master Plan that is intended to guide City decision names “suitable locations for homes and developments”, “solving congestion”, and “opportunities to improve open space such as parks, recreation areas and civic facilities”.

*Sunfield Investments (Church) Inc. – Weston Consulting* proposes to amend the existing By-law to allow them to build a high density project (91.8 units per net hectare), which would consist of 27 townhouse units, 24 of them – stacked back-to-back units in two blocks, accompanied by an underground and at grade 38 parking spaces, 30 of which are for the residents and 8 for their visitors, all with one (1) access to a busy Church St. E., immediately surrounded by low density, single family dwellings in the established central area of Brampton.

We believe that the application in question contradicts an *Official Brampton Plan for 2040 Vision*, which “depicts a more sustainable, urban and vibrant future for the City”. The application does not allow to achieve the aspirations of the *Brampton 2040 Vision*, which is “about the environment, jobs, neighbourhoods, transportation, social matters, health, and culture”. Allowing the Official Plan and Zoning By-law amendment in order for the *Sunfield Investments (Church) Inc. – Weston Consulting* to precede with their high density development proposal in this particular historical area of the established blocks of single family dwellings, not designated for high density development, contradicts the *Official Brampton Plan for 2040 Vision*. The lot surrounded by single family dwellings is not suitable as a site for the high density project of this magnitude. It will lead to serious negative impact on the quality of life of the existing area's residents and to barely sustainable and possibly unsafe daily operations for the potential residents of the multiple proposed units. This area is not designated for infill and strategic mixed use.

We consider that the current application of the *Sunfield Investments (Church) Inc. – Weston Consulting* contravenes the *Official Brampton Plan for 2040 Vision*, which states that Brampton's Land Use strategy is “to maintain land patterns” and promises to “preserve existing neighbourhoods of single family / low rise dwellings”. It does not include High density stacked back-to-back townhouse units on single family lots surrounded by older, established, single family houses in mature neighbourhoods.

The designated historical building, a single family dwelling, previously located at 172 Church St. E. sustained a fire damage and has since been removed. It does not mean that this single lot in the established, adjacent to the historical Brampton Centre area should suddenly for the residents become a potential site for a proposed Official Plan and Zoning By-law amendments and a subsequent high density development on that one (1) lot.

The City of Brampton has a number of precedents when in the recent years, construction of privately owned houses slightly bigger or higher than the existing surrounding houses in the established neighbourhood were disallowed and ordered to be demolished, as the owners' attempts did not respect the character of the neighbourhood. In following up with those previous instances, we assert that the Council should absolutely appose the current application from the *Sunfield Investments (Church) Inc. – Weston Consulting* to build their blocks of multiple stacked townhouse units and an underground and at grade parking facilities in the established blocks of low-rise character. The *Brampton Vision 2040* has a *Building Heights Strategy*, which includes “*providing for height transition between higher buildings and surrounding single family neighbourhoods*”. We consider the current development proposal of the applicant to be contradicting the above sections of the Plan.

The proposed high density townhouse units of such height (3 storeys high, or 8 storeys high in the tertiary plan), all being stacked in order to fit so many units and cars on one (1) residential lot, won't allow for views and reasonable solar access for the established surrounding adjacent lots of the block.

As mentioned in The *Brampton Vision 2040 Plan*, medium to high density growth *does not belong or balance the existing neighbourhoods*. The lot in question is located *outside* of the “*major Growth Area*”.

### 3. Very low Sustainability Score

*The Sustainability Score and Summary* done by Western Consulting and submitted by the *Sunfield Investments (Church) Inc. – Weston Consulting* in support of their application shows a score of **37/159**, or “*bronze level*”. As the minimum requirement is 35, the proposed development presents the buildings that will **barely meet reasonable and accepted requirements**. The *Official Brampton Plan* includes creation of a liveable city, not allowing additions of new developments of the high density projects, making the existing, established neighbourhood barely sustainable.

**4. The Traffic Impact Study** submitted by the *Sunfield Investments (Church) Inc. – Weston Consulting* in support of their application appears to show **discrepancies** in the number of parking spaces and their projected use / movements of vehicles. The description of the project says that there will be a total of “**38** parking spaces”, yet the Study is based on “**56** spaces”, not including 7 visitor spaces.

There is a big difference between showing the neighbourhood a proposal with 38 spaces total, including the 8 visitor spaces, and the Study done based on 56 + 7, or 63 spaces.

The Study bases its conclusions on an assumption that in AM, there will be **only 15 total trips**, i.e. out and in, and **only 19 trips in the PM**. The residents of **27 townhouse** units with **56 parking spaces** will be definitely making considerably greater number of regular, continuous, multiple daily trips in and out of the property.

We are questioning the applicability and relevance of such a Traffic Study, which is based on a deliberately lowered number of projected trips in relation to the number of available car spaces. We are also concerned with the discrepancies in the number of the proposed parking spaces – 38 total or 63 total.

*The Official Brampton Plan* talks about “*a safe and easy access for pedestrians and vehicles*”. We believe that the application to amend the Official Plan and Zoning By-law to facilitate the development of this townhouse project, which includes one (1) access to Church Street for the residents of 27 townhouse units and for the 38 vehicles parked in their underground and at grade spaces contravenes the intent of the Plan to allow for people’s reasonable safety in their day to day operations.

The Church Street is a busy residential street, becoming even busier during the morning and afternoon school-end hours, as well as during the regular commute rush hour traffic. The proximity of the proposed development to the extremely busy Central Peel S.S., which currently has 1185 students registered, means that the sidewalks of that side of Church Street are filled with children walking to and from school. Only 50 of those 1185 students ride a school bus. Hundreds of the other students walk along of Church Street at least twice daily.

In addition, very close to the proposed development site, there is a mini school day care, adding more people, primarily parents with toddlers and babies in strollers, walking past the lot in question at least twice a day, to and from the daycare. The addition of so many new residents and their multiple vehicles, trying to enter and exit from the same one (1) driveway, without a traffic light, onto such a busy residential street filled with children is asking for a disaster.

As long time residents and taxpayers of Brampton, we are asking the Council and the Planning & Development Services Department to consider the safety hazards that all those additionally added proposed townhouses’ vehicles trying to turn left against the Church Street traffic, without a street light to do it safely, in order to go toward the busy Kennedy Rd., and possibly farther toward the Hwy 410, will create for the community.

It goes without saying that with the traffic light already available at the actual intersection of Church and Kennedy, there will be no new street light established in front of 172 Church St. E. just for those additional residents trying to battle the existing heavy street traffic and the pedestrians, many of whom are children, while the 172 Church St. E. drivers are trying to gain access to and from their numerous townhouses.

**5. The Acoustical (Noise) Report** submitted by the *Sunfield Investments (Church) Inc. – Weston Consulting* in support of their application appears to focus on ensuring greater comfort for the potential residents of the proposed high density townhouse project. The document does not address the issues of the inevitable negative impact on the acoustical environment of the residents of the existing low rise single family houses immediately adjacent to the proposed townhouses, nor does it address the issues of the effects of the additional noise on the entire neighbourhood. This includes, but is not limited to potential noise from high density units' residents, their multiple vehicles (as high as 64, according to the Traffic Study), underground garage doors, garbage disposals, construction noise, etc.

**6. The Brampton 2040 Vision Plan** emphasizes “*preservation and enhancement of existing green spaces*”.

We believe that *The Arborist Report and Tree Preservation Plan* listed among the supporting documents submitted by the applicant are not included among its listed studies.

Instead, what was made available to us, at our request, among the supporting studies from the developer, is “***Tree Inventory Preservation Study***”. This study includes the destruction of **53** trees and injuries to **12 more** trees. It means **65** mature trees in the established Brampton neighbourhood will be destroyed either immediately or soon after they were “*injured*”. To “compensate” for this incredible loss of green canopy, the developer is suggesting to plant 38 young trees. The lot of this size, which previously housed only one (1) single family house, and is now proposed to contain 27 townhouses and 64 parking spaces, will have a very limited land left available for any vegetation, let alone for mature trees. What kind of “38 trees” can *Sunfield Investments (Church) Inc. – Weston Consulting* provide and how will they compensate for the loss of the  $53 + 12 = 65$  mature trees in the established residential neighbourhood? We believe that the proposal of *Sunfield Investments (Church) Inc. – Weston Consulting* contravenes the *2040 Vision Plan* for our city and will not add value to the green space, esthetics or air quality of the city.

**7. The timelines of the application process of *Sunfield Investments (Church) Inc. – Weston Consulting* and the timelines allowing for public involvement prior to the Jan. 18, 2021 public meeting.**

*The Complete Neighbourhood Audit Program 2019-04-15 and the Report of the Planning & Development Committee 2019-05-13* recommended The Nurturing Neighbourhood Program to improve the quality of living in neighbourhoods across Brampton. We do not believe that the input of the neighbourhood directly affected by the proposed amendments and developments have been given reasonable and sufficient time, as well as information, to provide input regarding the comfortable and sustainable living, represented in the *Neighbourhoods of the Brampton 2040 Vision*.

If Brampton proclaims that it has the objective “*to empower residents to play active role in improving their own neighbourhood*”, the City needs to make its residents aware of the existing and proposed

developments directly affecting their lives. In the case in question, majorly negatively effecting multiple residents of the city.

In reality, we received the official notification letter from the Planning Development Services only on 2020-12-15, shortly before the holiday season, when multiple businesses and residents are inaccessible.

In addition, the City would benefit its taxpayers and residents, if it takes into consideration the current realities of the Covid-19 pandemic and the lock-down. The letter notifying the residents of the application in question arrived in the midst of the serious deadly virus outbreak, adding enormous stress and tragedies to all. Your letter says that “The City of Brampton takes COVID-19 seriously” and wants to “protect the health and well-being of our community”. We believe that offering residents a very limited time to research the issue, which is going to ruin the lives of so many here, during the Lock Down, when the Health and Government officials issue the order to “stay home”, yet we, affected by this amendment and development proposal, had to go visit the site and try to communicate with the neighbours, thus endangering ourselves and them. Social distancing is not as good as “staying home”. Why is the City not following its own proclamations that you are taking COVID-19 seriously, if you expect the business to continue as usual?

During the mandatory provincial and municipal Lock Down and the holiday season, it appears that the developer chose this particular time in order to attract as little opposition to its high density application as possible.

If the City of Brampton and its *2040 Vision* recommend “*community engagement*”, “*fostering of civic action*” and promises to build its *Vision 2040* on “*collaborative spirit*”, the above situation with the timelines of this particular application does not correspond to its vision.

Please be advised that we believe that in order to collect data for their studies, including the July 29, 2020 Environmental Site Assessment, in support of the application, the party acting on behalf of the *Sunfield Investments (Church) Inc. – Weston Consulting* was collecting soil samples in the neighbourhood, without providing any advance or requested at the time explanation to the residents immediately affected by that sample collection and the reason for the collection. We reside in the close proximity to the proposed site. We did not receive any official notification about the sample collections going on or next to our properties. In summer 2020, unknown individuals were conducting a digging and ruined the boulevard lawn, which the City expects the homeowners to take care of. The individuals did not approach us, the homeowners, or explained their actions. When we questioned who they were working for and asked to show us the documentation, the individuals chose to abandon their job and ran away with their shovels and collection items in their van. This application is the only one immediately affecting our neighbourhood, and the timelines coincided with the *Environment Assessment Study*, so there is a high probability that the party acting on behalf of *Sunfield Investment* and doing the soil collections here had been trying to keep the purpose of their actions a secret from the neighbourhood, reasonably anticipating a strong opposition to their plans. If the applicant includes the soil sample collection as a part of their environmental study, they should provide documentation showing how the residents had been notified of the soil taken from their adjacent lawns, and why the

collectors refused to provide answers for the reason of their digging here. Nor did they compensate us for the damage to the boulevard lawn, of which the homeowners are expected to take care.

This appears to support the earlier mentioned point that the timelines and the manner of the preparation of this particular application to amend the Plan, the Zoning by-law, and to erect high density units on one (1) residential lot, had been purposefully done in a manner to conceal the plans for the upcoming application.

We believe that the application will be to the detriment of the quality, character and amenity value of the area, as well as present a safety hazard and a nuisance drastically lowering the life of the residents, as outlined in the points above.

We would be grateful if the council would take our objections into consideration when deciding this application by *Sunfield Investments (Church) Inc. – Weston Consulting* (City File No.: OZS-2020-0026).

Sincerely,

Mr. and Mrs. Snyder