

November 17, 2023

GSAI File: 601-001

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

Attention: Mayor and Members of Council

**RE: November 20, 2023 Planning and Development Committee
City-Initiated Amendment to the Zoning By-law
Item 5.1 - Report No. Planning, Bld & Growth Mgt-2023-904
City of Brampton**

Glen Schnarr & Associates Inc. (GSAI) are the Planning Consultants for 1212949 Ontario Inc. (Ashley Group of Companies). On their behalf, we are pleased to provide this Comment Letter in relation to Item 5.1 - 'City-Initiated Amendment to the Zoning By-law' on the November 20th Planning and Development Committee Agenda.

For context to this Comment Letter, GSAI and 1212949 Ontario Inc. are actively working on clearing the draft conditions of approval for Subdivision File 21T-10001B (Blocks 96 and 97) under City of Brampton File C05W01.005, which includes single detached dwellings of various sizes. This work will facilitate a complete community and represents Phase 2 of registered Plan 43M-2002.

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 submitted to the City. Included in the proposed amendments is an amendment to Section 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 2.7 m by 5.4 m to 3.3 m by 7 m, 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 1212949 Ontario Inc., we offer the following comments and observations regarding the 'City-Initiated Amendment to the Zoning By-law':

- We understand the City has satisfied themselves on alternative garage standards less than 3.3 m by 7 m elsewhere in the City. 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 (3.3 m by 7 m) 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 is 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 garage 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 7 m assumes 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.
- The City of Brampton's Development Design Guidelines states that "*garage widths shall be a balance within the proportions of the house and lot width they serve. To advert negative impacts on the streetscape, large garages on narrow lots are to be avoided.*" It is our opinion that the proposed 3.3 m by 7.0 m minimum requirement could result in disproportionate streetscape design for residential units. 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 a minimum of 2.7 m by 5.4 m (14.58 m² or 157 ft²) to 3.3 m by 7.0 m (23.1 m² or 248.6 ft²) would result in the removal of 8.52 m² or 91.7 sf of living space on every unit. **This is basically equivalent to a loss of a bedroom on each unit, which does not support larger, family sized dwelling units.**

With the current housing market conditions and the priority for delivering more affordable housing, we feel that the increased interior garage standard just to conveniently store and move the garbage bins is counter-intuitive to achieving these priorities. Furthermore, there is no assurance that increasing the garage space will result in occupants not putting garbage bins in the front yard – this is a zoning enforcement issue and could continue to be a zoning enforcement issue even if the minimum garage size is increased if the occupant uses the extra space for other storage needs. **As such, we ask that City Council maintain the current minimum interior garage standard of 2.7 m by 5.4 m and that staff be directed to assess the convenient storage and movement of waste bins in the garage on a site by site basis.**

Subdivision 21T-10001B is already Draft Approved with a site-specific Zoning By-law approved. It is one of the many approved projects, not yet at Building Permit stage, which could be negatively impacted by the proposed, broad sweeping changes to the minimum garage dimensions. Should Council decide to approve the increase in minimum garage dimensions, we strongly suggest transition provisions be included to appropriately transition projects which have been approved to date, but not yet at Building Permit stage. This will help prevent further delays in delivering much needed housing.

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,

GLEN SCHNARR & ASSOCIATES INC.



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