

November 17, 2023

GSAI File: 1328-003

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 2769197 ONTARIO INC. (the 'Landowner'). On behalf of the Landowner, 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 the Landowner are actively working on an Official Plan and Zoning By-law Amendment application for lands municipally addressed 8957 Heritage Road, Brampton under City File # PRE-2022-0109. The proposal is for a medium density, mixed-use development, which includes dual frontage townhouses and street townhouses. We anticipate filing formal planning applications in the upcoming weeks.

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 the Landowner, we offer the following comments and observations dealing with 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 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 (14.58m² or 157sf) to 3.3 m by 7.0 m (23.1 m² or 248.6 sf) 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.

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.



Colin Chung, MCIP, RPP
Managing Partner



Jennifer Staden, MCIP, RPP
Associate