

June 30, 2021

Town Clerk, Holly Willford
20 Pelham Town Square
P.O. Box 400
Fonthill, ON
L0S 1E0

**RE: Public Meeting for Official Plan and Zoning By-law Amendments – 1365
Station St (File No. OP-AM-03-2020 & AM-11-2020)**

As a resident of Emmett St I am opposed to this application to allow the development of a 4 storey building at 1365 Station St through Official Plan and Zoning By-law Amendments. I have reviewed the proponent's submission to the Town and provide the following comments:

**Planning Justification Report completed by Hummel Properties Inc. dated
October 19, 2020**

The report confirms that:

- a) the Official Plan Schedule A1 does not identify this property as a potential intensification area;
 - b) the property is currently zoned as R2 and does not permit an apartment building; and
 - c) the property is surrounded by low density residential to the north, west and south.
- The East Fonthill Secondary Plan Area, Schedule A5 – Land Use Plan shows the property immediately to the east as being low density residential also.

The lot size is similar to that of the single storey house to the north which stands to reason why this lot is not identified for intensification and is zoned for a single detached dwelling.

The report suggests that adding a 4th storey to this building is inconsequential and comparable to other buildings in the area. There are no other 4 storey buildings in the area and all other apartment buildings referenced in the report are under 4 storeys with sites large enough to provide outdoor parking and the proper setbacks. The only reason for the additional storey on this development is that the site is not large enough to provide outdoor parking.

To permit the development of an apartment building the property needs to be rezoned from R2 to RM2. However, the report further details all of the site specific variances that would have to be approved as part of the Zoning By-law amendment, 13 in total. This includes reduced rear and side yard setbacks, a reduction in the required number of parking spaces, a reduction in the entrance width, increased lot coverage, a reduced landscape area, a reduced amenity area, etc. With so many variances required it is hard

to agree with the argument that this development is a good fit for this specific site and compatible with the surrounding area.

Traffic Impact Study (TIS) completed by Paradigm Transportation Solutions Ltd. dated October 2020

There are a few issues with the TIS that should be noted, first that the study states the development consists of 18 units, not 24 as is the case. Therefore, the estimates of traffic generated from the site would be lower than actuals.

The study itself notes that a new traffic count at this time would not be representative of typical operations due to COVID restrictions causing lower than normal traffic volumes. Due to this the consultant used an existing traffic count from the intersection of Station St and Summerside Dr from March 10, 2020 to estimate northbound and southbound traffic in front of the proposed development.

Typically, a traffic count used to make any sound decisions should be collected for a minimum of 1 week to be able to review both weekday and weekend traffic volumes and patterns. The TIS uses 1 day of data on a weekday over a year ago when COVID issues were beginning.

The data collected from the intersection of Station St and Summerside Dr does not account for traffic movement in front of the development coming solely from College St, Emmett St and Port Robinson Rd.

The TIS estimates traffic volumes from the various developments identified in the Secondary Plan and references a map to illustrate the locations, that figure is not included in the report.

The conclusion of the report is that the site will operate without any problem movements, that is questionable based on the issues noted above. The study should be redone with a proper traffic count when conditions return to normal and with correct information on the proposed development and surrounding developments.

Official Plan and Zoning By-law Amendments

Policy B1.1.3 of the Official Plan, Residential Intensification, notes that while intensification opportunities will be encouraged, proponents will be expected to demonstrate, through the provision of detailed site plans and elevation plans, that Town of Pelham Official Plan proposals will be respectful of, compatible with, and designed to be integrated with the community or neighbourhood where they are proposed.

The applicant is requesting an Official Plan amendment to delete Policy B1.1.13 (c) to allow a residential intensification and redevelopment on lands abutting a local road to increase density by more than 25% of the existing gross density of lands located within 300 metres of the site. Policy B1.1.13 (c) plays an important role in controlling the

density of new infill developments relative to the surrounding land uses, deleting this policy will impact the Town's control on future infill development proposals on local roads.

This Policy further states that the resultant development will be characterized by quality design and landscaping, suitable building setbacks, and further that parking areas and traffic movement will not negatively impact the surrounding neighbourhood from the perspective of safety or neighbourhood character. As outlined in the proponent's Planning Justification Report, the proposed building does not meet Zoning By-law setbacks and the required landscape area which will require a site specific amendment. The proposed setbacks do not allow sufficient space to provide adequate buffering on the site that would be considered part of a quality design and landscape. The building is proposed as a 4 storey to accommodate parking on the 1st level as there is not sufficient space on the site. It does not appear that this proposal is designed to be integrated into the neighbourhood, it is what can be fit on the site. To prove compatibility with the surrounding area the proposal should be able to meet the Town's Zoning By-law.

Policy B1.1.5 of the Official Plan states that for apartment dwellings Council shall be satisfied that the proposal:

- a) Respects the character of adjacent residential neighbourhoods, in terms of height, bulk and massing;
- b) Can be easily integrated with surrounding land uses;
- c) Will not cause or create traffic hazards or unacceptable level of congestion on surrounding roads; and
- d) Is located on a site that has adequate land area to incorporate required parking, recreational facilities, landscaping and buffering on-site.

The proposal of a 4 storey apartment building certainly does not meet the criteria set out in a) and b) of Policy B1.1.5 as it does not respect the character of the surrounding low density residential neighbourhood. The building is not well integrated into the area being the only 4 storey building and being located between a single storey home and a two storey residential site. The scale of the proposed front building elevation provided with the application in relation to the neighbouring buildings is questionable and should be confirmed as it could be deceiving.

The Traffic Impact Study has a number of issues that need to be addressed and therefore it should not be concluded that this proposal has satisfied c) of Policy B1.1.5.

The proposal also does not meet the criteria set out in d) of Policy B1.1.5 as the site is small for such a proposed development requiring the parking to be located under the building, increasing the number of storeys from 3 to 4. Additionally, the building is in such close proximity to the surrounding low density residential neighbourhood that the Zoning By-law setbacks cannot be met and there is no ability to provide adequate buffering on the site.

I believe the points above demonstrate this proposal is not compatible with the neighbourhood and should not be approved. Policy aside, the proposition of building this beside a single storey home will impact the quality of life for those residents and possibly impact the value. The shade study provided in the concept drawings shows the home completed under the shadow of this building at various points in time. The consultant notes this is only in winter and should therefore be adequate however I would disagree with this opinion and suggest winter is when people need light the most. Perhaps a shade study without the proposed building in place to show existing conditions would be helpful to provide that full picture.

This application should be a concern for all residents of Fonthill that could unexpectedly find themselves living next to an infill development that is not compatible with their neighbourhood and the answer cannot be to simply move as many existing residents have now been priced out of our community. It should also be a concern for Planning Staff to delete a Policy from the Official Plan that limits the control of future infill developments.

I would ask that Town staff and Council consider the area residents that would be immediately impacted by this development and all of the residents of Fonthill that could be impacted by setting such a precedent for similar proposals in the future and deny this application.

Thank you,

J. Bernard
■ Emmett St
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