



March 15, 2022

**TO:** City of Hamilton Committee of Adjustment

**RE:** Application No. HM/A-22:47, Municipal Address: 261 West 31<sup>st</sup> Street, Hamilton  
Application No. HM/A-21:366, Municipal Address: 38 Rendell Boulevard, Hamilton  
Application No. HM/A-22:41, Municipal Address: 56 Chamomile Drive, Hamilton  
Application No. HM/A-22:49, Municipal Address: 51 Raleigh Street, Hamilton

Dear Committee Members,

Please accept this submission as Environment Hamilton's comments on Applications No. HM/A-22:47, HM/A-21:366, HM/A-22:41, and HM/A-22:49. **Our goal via this submission that addresses multiple applications on the March 17<sup>th</sup> agenda, is to express our strong support for more 'second dwelling units' (SDUs) in Hamilton – and that includes our support for these 4 proposed SDUs.** We strongly support the city's new residential zoning policy that allows homeowners within Hamilton's urban neighbourhoods to establish an SDU in their primary property, or to build an SDU as an accessory unit on their property. The ability for residents to do this is designed to begin to eliminate 'exclusionary zoning' in low density urban neighbourhoods across the city, and to facilitate 'gentle density'. Gently increasing population levels within existing residential neighbourhoods makes sense on many fronts. From a financial point of view, it allows for better use of already serviced lands. Increasing population numbers makes additional neighbourhood amenities more viable over time. These amenities might include: more commercial/retail services, services like medical care offices and banks/financial institutions, and more and better public services like public transit and active transportation infrastructure, to name a few.

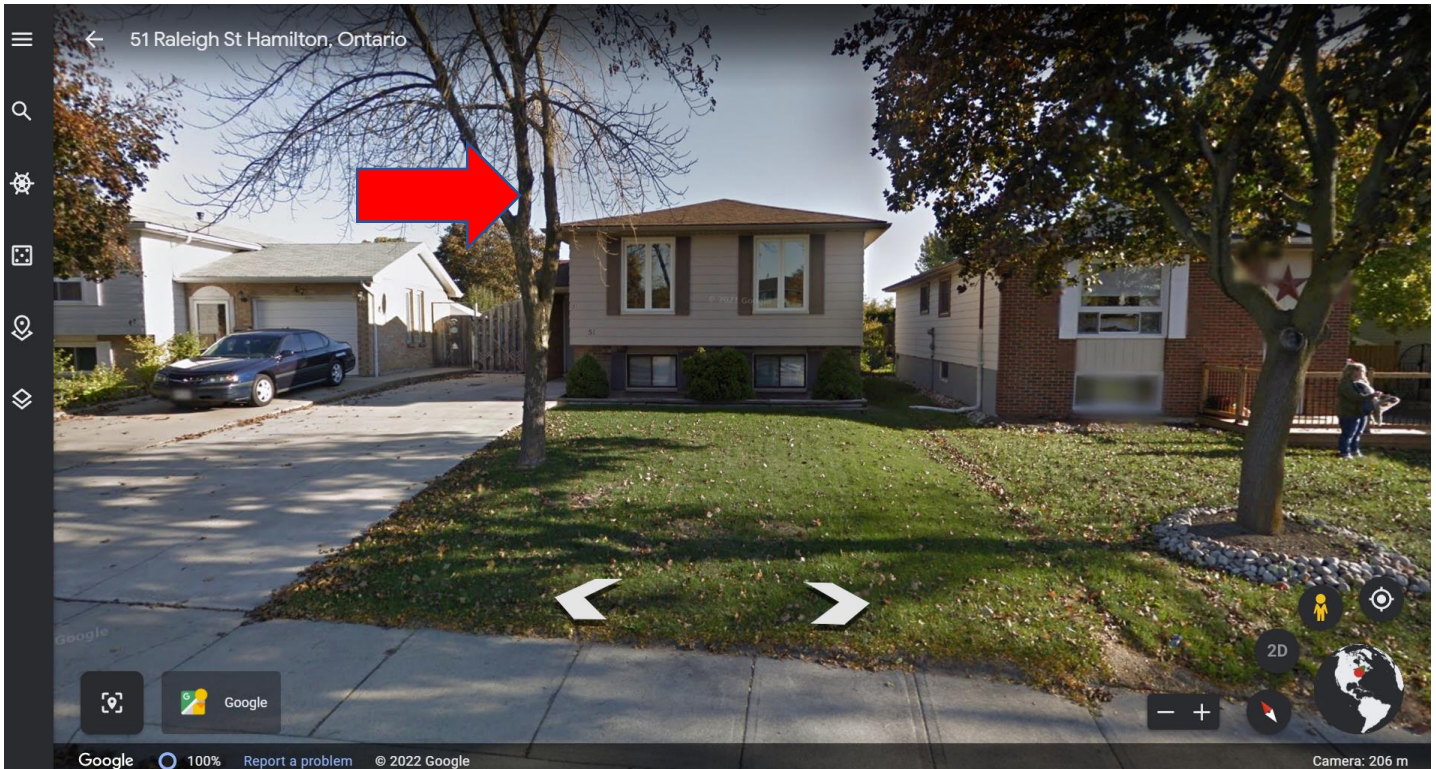
We also note a consistently emerging challenge with SDU applications in some areas of the city – the parking requirements that applicants must satisfy. All four of the applications referenced above are requesting variances to the mandated parking requirements in order to proceed. We note that the parking requirements imposed for SDUs vary across urban Hamilton based on location, with no parking requirements for downtown zones. While we understand that no parking for SDUs in downtown zones makes sense given the greater level of public transit service and active transportation infrastructure, we believe that parking requirements for SDUs in other areas of the city need to be viewed with an eye to ensuring that SDU proposals in these other areas are ultimately supported and not thwarted by parking requirements. We have provided comments on each of the variance requests below.

### **56 Chamomile Drive:**

The proponent is requesting that on-site parking cover 58% of the front lot, beyond the 50% limit. We support granting the proponent this variance, but would urge that they consider utilizing pervious surface for the additional parking. The restrictions on lot coverage are very directly related to the ability of a property to effectively absorb stormwater flows and to provide green – including street trees – in a neighbourhood. We need to ensure that the addition of an SDU to a residential property does not reduce a property's 'climate resilience'.

### 51 Raleigh Street:

The proponent has indicated that they are unable, with the current configuration, to accommodate another parking spot for the proposed SDU that is obstructed. Instead, they are seeking approval to be able to allow parking in tandem in the existing driveway. We support this request and recommend that the Committee of Adjustment grant the variance. We would add that, widening the driveway to accommodate a second space that is unobstructed would require the removal of a mature, front lawn tree that, based on its location in the front yard, is very likely a city street tree (see photo below). We hope the Committee of Adjustment agrees that sacrificing a street tree to provide unobstructed parking for an SDU unit does not make sense on any level! The City of Hamilton has declared a Climate Emergency and we need to enhance our urban forest canopy cover -not reduce it to accommodate parking.



### 38 Rendell Boulevard

This application is requesting a variance to allow 2 parking spaces instead of the required 3. We support this request in order to enable the proposed accessory SDU to proceed. This location is within easy walking distance of several public transit lines and a street that includes active transportation infrastructure. It is not unreasonable to expect that a future resident at this location might live car-free, using public transit and/or active transportation instead.

### 261 West 31<sup>st</sup> Street

This is yet another SDU proposal that requires a parking-related variance. The proponent indicates that they are unable to meet the minimum required 6.0 m length of parking space. Instead, they are seeking approval for a 5.0m length parking space. It is also noted that the applicant is able to maintain the minimum 50% lot coverage as landscaped area – a positive where on-site stormwater management and climate resilience are concerned. We support the variance request from this applicant.

In summary, we support these 4 applications for variances to parking requirements. We support these requests because granting these variances will ensure that the SDUs proposed for these locations will proceed.

Thank you

A handwritten signature in black ink, appearing to read "L. M. Lukasik". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Lynda M. Lukasik, PhD  
Executive Director

Environment Hamilton  
51 Stuart Street  
Hamilton ON L8L 1B5  
[llukasik@environmenthamilton.org](mailto:llukasik@environmenthamilton.org)  
TELL (905) 549-0900