



February 15, 2024

File #: 2208

Russell Harley, Municipal Building Official I  
AND  
Kelsey Hammond, Chief Building Official

Building and Planning Services  
City of Stratford  
82 Erie Street  
Stratford, ON, N5A 2M4

Via E-mail: [rharley@stratford.ca](mailto:rharley@stratford.ca) and [KHammond@stratford.ca](mailto:KHammond@stratford.ca)

Dear Russell and Kelsey,

**Re: Updates to Heritage Alteration Permit Application & HUDIA Addendum  
203-209 Waterloo Street South - The Bradshaw Towns Inc.**

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Pursuant to our Heritage Alteration Permit Application submission of January 5, 2024 (filed to Alexander Burnett), we have been informed that some minor changes have been made to the proposed infill development for 203-209 Waterloo Street South ("subject lands") care of The Bradshaw Towns Inc. (the "Owners"). Our understanding is that the changes were required to comply with the Ontario Building Code.

Since the filling of the Heritage Alteration Permit Application and the Building Permit Application by the Owners (under separate cover), several comments were received, which revolved around the design and permit requirements. Specifically, it was provided that the ground floor's height need not meet a specific requirement but should adhere to a maximum height within the Central Commercial "C3-7" Zone of the City of Stratford Zoning By-law.

Accordingly, updates have been requested to the Heritage and Urban Design Impact Assessment to reflect the proposed changes in the building design. Specifically, it was requested that the Heritage Permit Application, focus on items such as elevations, height, and below-grade landing removals.



In our opinion, the Heritage and Urban Design Impact Assessment report does not need to be updated, as the proposed changes to the building are minor in nature, and do not fundamentally change what is proposed on the subject lands. As the application at hand is strictly related to the Heritage Alteration Permit, we offer the following additional rationale and commentary on these changes through this letter, which can serve as an addendum instead.

### **Summary of Proposed Changes to Building**

The proposed development continues to involve the infilling of a vacant lot on the periphery of the City's Downtown Core Heritage Conservation District ("DC-HCD"), constructing a 3-storey residential building. The brownstone-inspired design continues to be advanced with a parlor floor, albeit, in a slightly refined design now without below-grade landings for lower-level units, along with some other minor changes. The building continues to be strictly residential in nature, with no non-residential uses planned. The changes introduced are as follows:

- The overall building height has been reduced, with nearly 0.91 metres (3 feet) taken off the main floor-to-ceiling height (parlor floor).
- The height of exterior doors, serving as entry points to the units, has been reduced from 3.05 metres (10 feet) to 2.74 metres (9 feet).
- The below-grade landings for the basement (lower-level units) have been removed, and double windows will be installed instead, including a window well as they start below grade.
- The windows in the basement ensuites, situated under the back stoops, will be positioned slightly higher than initially shown, above grade.
- The exterior stairs have been flipped, mirrored in each unit bay, so they are now positioned in front of the bed in the basement bedroom.

### **Background / Status**

As you know, a Zoning By-law Amendment has been approved and is now in effect for the subject lands. As part of the amendment process, a combined Heritage and Urban Design Impact Assessment (HUDIA) was prepared and submitted to efficiently address the DC-HCD Standards and City urban design guidelines. The HUDIA assessed the proposal's impacts on the surrounding area, recommending mitigative measures and evaluating the proposed development's design within the urban context. It was intended to guide implementation and offered conclusions and recommendations for both heritage and urban design mitigation strategies.

Overall, the proposed 3-storey residential building was deemed appropriate for the lands and surrounding area, enhancing the streetscape, and supporting a more efficient land use. The HUDIA was accepted without edits, with 12 recommendations and 5 considerations to be reviewed during the building permit stage. A copy of the approved HUDIA was enclosed with our January 5, 2024 Heritage Alteration Permit Application submission.

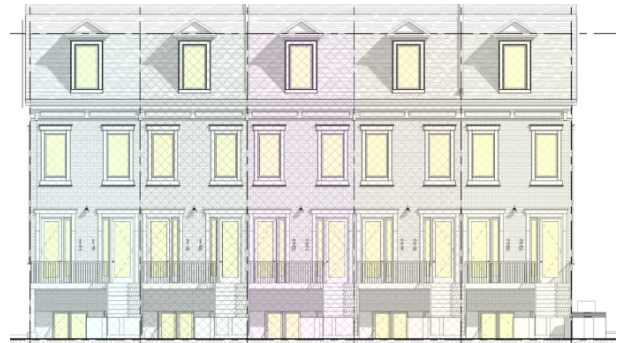
## Updated Plans and Renderings

A visual of the updated building design compared with that of the original submission is provided below, where were prepared by BM Architectural Design. The images below are not to scale, are for visual comparison only, and the building permit drawings should be referenced for exact measurements.

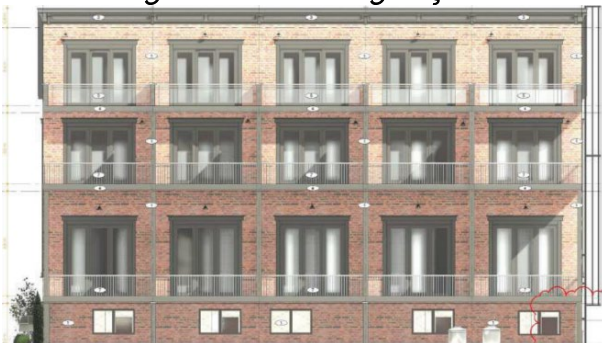
*Original: Street-Facing Façade Along Waterloo Street South*



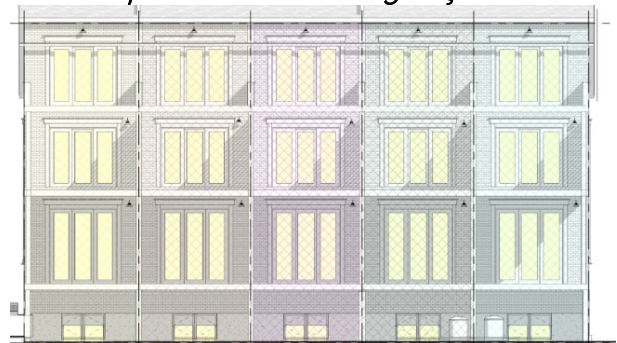
*Updated: Street-Facing Façade Along Waterloo Street South*



*Original: Rear-Facing Façade*

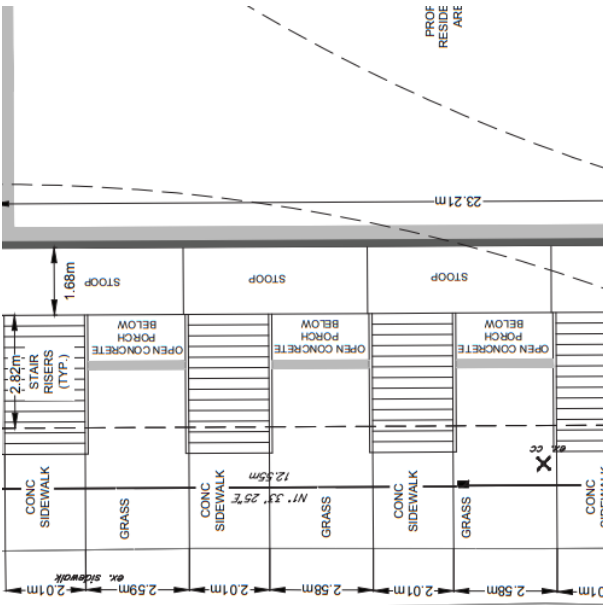


*Updated: Rear-Facing Façade*

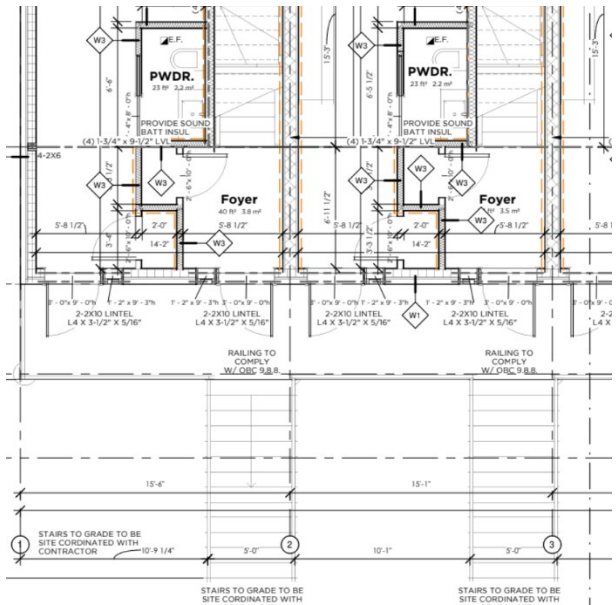




*Original: Main Floor / Site Plan  
(with Lower Landings Left-Hand Stairs)*



*Updated: Main Floor / Site Plan  
(without Lower Landings Right-Hand Stairs)*



## Summary Opinion on Changes and Conclusions

In our assessment, even with the proposed minor changes described above, we maintain our opinion that the proposal will not result in any adverse impacts to the subject lands, adjacent properties, or the DC-HCD. Any impacts considered will be mitigated through our previous recommendations in the original HUDIA.

The proposed design, even with the changes continues to preserve the general rhythm, orientation, and proportions of the predominant streetscape, particularly along Waterloo Street South, while complementing the existing heritage character with distinguishable elements. By filling in a gap in the heritage frontage along Waterloo Street South, the revised proposal will still contribute to a more continuous streetscape.

The design, including the facade's compatibility with surrounding brick and stone masonry, ensures minimal impact on the built heritage context. Anticipated incremental shadow effects and other considerations remain unchanged, and perhaps even more minimal given the slight reduction in overall height and continue to pose no significant concerns. Overall, the slight changes proposed to the building's elevations and height, and the removal of the below-grade landings do not change our original position on the matter of heritage impacts. The revised proposal continues to be a good fit for the DC-HCD and neighbourhood, in our opinion. With the adoption of our recommended solutions for



protection during construction and post-construction (see original HUDIA), no adverse impacts are foreseen regarding destruction, alteration, isolation, views, land use changes, or disturbance. Upon completion, the proposed building is expected to enhance the heritage frontage and pedestrian experience along Waterloo Street South, aligning with good heritage conservation practices.

Hence, we believe the slightly revised proposal continues to be appropriate and deserving of approval, maintaining compatibility within the Downtown Core Heritage Conservation District.

A copy of the final updated Building Permit drawings prepared by BM Architectural Design are included under separate cover. I trust the above provides the appropriate response to the comments received and the changes to the building that have been issued, and kindly request that the Heritage Alteration Permit Application be approved.

Yours very truly,  
Bright Past Heritage Consulting Inc.

A handwritten signature in black ink, appearing to read "Evan Sugden". The signature is fluid and cursive, with a long horizontal stroke at the end.

Evan M. Sugden, HBASc, MA, CAHP, RPP, MCIP  
President | Heritage Planner

Cc.     *The Bradshaw Towns Inc.*  
          *Caroline Baker (Baker Planning Group)*  
          *Michael Unrau (City of Stratford - Municipal Building Official III)*  
          *Alexander Burnett (City of Stratford – Planner)*