

Comments on the Juliana Development Zone Change Application

To: Stratford Planning Department
Attn: Alex Burnett

I am writing to express concerns over the Juliana Development and the Zone Changes that have been requested. Below is a list of the biggest concerns I have about the changes. They are listed in order of the most concerning to the least.

Density

The increased density of this project will destroy this neighborhood. We are currently living in a city block with a density of between 30-35 units per block. This project is almost 4 times that density. There are so many questions about whether the existing infrastructure can handle this increase in population.

The studies that have been provided by the developer are nice 'picture perfect' examples of how it 'could' work, but the reality will likely be something much less desirable.

The conversion of the Krug factory into residential apartments is welcome. I think that is a great re-use of the existing property. Utilizing some of the surrounding land (parking lot/field) makes sense to work in conjunction with the factory building. However, adding another 238 units on top of the 144 factory is excessive. A density of 75-100 units per hectare would be much more in keeping with the feel of the neighborhood. There is a serious lack of green space in the proposal. If the density were reduced, there would be less need for parking and less need for building space which could increase the green space.

I am concerned that the 'housing crisis' has tainted the attitudes of developers and planners that we need to cram as many housing units as possible into any area we can. I don't want to see much expansion into farmland either, but why does there appear to be two sets of density rules? Inside the city stack them as deep and as high as possible, but on the newly developed farmland, continue to provide single family houses with large yards.

Height

The request for the exemption of the height requirement is a very arrogant attitude of the developer. There are no residential buildings in Stratford that are over 22 m. Why do they think they cannot only exceed the maximum height, but blow through it by an additional 63.6%? In this case it is not just the local neighborhood that will be affected. The tower will be able to be seen for miles around. Many tourists come to our 'picturesque' city for the Stratford Festival and the small town feel. I'm sure tourists will

be able to see the new eyesore as they come in along Ontario Street towards the Festival. So much for the 'picturesque' city.

The developer's comment that the 36 m building is set in the middle of the property to help reduce shadows and reduce the height discrepancy with the surrounding existing houses is not entirely believable. When I drive around Stratford, I can see the tall structures (Dufferin Water Tower, Forman Ave Water Tower, and Masterfeeds grain elevator) from several kilometers away. These are all smaller objects than what has been proposed for the Juliana development. Also, none of these will have people living in the structure, who will be able to look out their windows and look down over the neighborhood. So much for privacy on your own property.

From a personal point of view, this 10-story building will be situated directly in front of my house. I'm not looking forward to having this building take up a significant part of my horizon. When we moved into our house 25 years ago, I knew the Krug factory existed. I accepted that building as part of my view. I also knew at that time there was potential down the road to have the parking lot and field turned into development (houses). I never thought this would be developed into high density tall buildings.

Off Street Parking

The number of parking spots allocated to this development is below the standard allowable for R5 residential zoning. This is a concern for me, as where are the excess cars going to park? On the street? There are 382 units proposed for this site, with (including visitor parking) 393 parking spots. Many families have more than 1 car. There are 149 2-bedroom apartments, and 49 3-bedroom units for a total of 198 units that have a potential of multiple cars. These cars will need to go somewhere.

The parking study carried out by the Baker Planning Group for this proposal is not worth the paper it's printed on. Comparing the parking potential of this site to Campbell Court and 337 Home Street is very much comparing apples to rocks. Neither of these two sites have the same socioeconomic levels as the Krug neighborhood. For the Campbell Court area, many residents are just able to afford housing, and maybe not a vehicle. For the Home Street apartments, again they are less likely to afford a vehicle, and some of those residents are older and may no longer be driving. I would assume the Juliana development would be looking for a mix of families and younger professionals to take up residency. For a more equal comparison, use the parking lots of the new Oxford Haus apartments at 25, 45, 65, 85, and 105 Oxford St., the apartments at Romeo Court at 40 Long Drive, or the Villas of Avon on John Street.

I am concerned about overflow parking on the surrounding streets. Many of the houses on Trinity St. share a driveway. In many cases the Trinity St. residents park their cars on the street during the day, to make it easier for the 2 homes to get in and out of their driveways. At night the cars generally park in their shared driveways. Adding a

significant number of cars to the area, without adequate parking, is going to make an already existing problem worse. Cars from the development will use Trinity St. to park, thus congesting the road more, as well as making it more difficult for those who already live in the area.

Where will the snow get piled up during the winter when the parking lots are plowed? I assume it will likely be piled on the existing parking spaces. That would mean even fewer parking spots in the winter.

What is the contingency plan for too many cars and not enough space? At the Bradshaw Lofts it appears the backup plan is the empty parking lot where the Bradshaw townhouses are supposed to go. There is no backup parking plan for the Juliana project.

Lot Coverage

The expected lot coverage of the Juliana development exceeds the lot coverage allowed by an additional 40%. They want buildings to cover 42% of the property, instead of the allowable 30% of the land.

WHY?? Cramming more people and more buildings into the allowable space does not seem pleasant for the residents of the site, nor the existing people who live around the site. The percentage of lot coverage does not include the required parking spaces to service these buildings. Nowhere in the developers plans does it include how much of the land is devoted to parking spaces. There seem to be 2 large parking areas, 2 smaller parking areas, a Woonerf which has a TBD design, and a single lane access road. That is a significant portion of land that is covered either by buildings or asphalt. I would imagine it is much more than 42% of the property.

Yard Depths (Front, Side and Rear)

Decreasing the depths of the yards on the new proposed buildings is unnecessary. Reducing these depths allows for more units, allows for more parking, at the cost of the quality and aesthetics of the neighborhood. I understand the existing factory cannot be moved, in that case and only the case of the Krug factory the zoning amendment could be approved. There is no need to amend the new buildings for their yard depths. It appears this amendment is about nothing more than greed to put as many units as possible into this space.

Rezoning Land that isn't owned by Juliana Developments

The rezoning application is for 93 Trinity Street and 266 King Street. Juliana Development (BMI) does not own the property at 266 King Street. All these plans are based on the development team owning the King St property. How can this city council approve the rezoning of land that is not owned by the party asking for the rezoning? It

sets a very dangerous precedent. What is to stop others from doing it in the future to enhance their own projects?

Rezoning Amendment Implications

If the city allows these rezoning amendments, where does it stop? If you let one developer build a 10- story building, the next developer will say you allowed it once, so we can build one just as high. The next one might be downtown, or in one of the more well-off neighborhoods. Once Stratford opens the door, the developers are going to come rushing in. Sounds great for the city, but at what cost? The small town, Festival City will be developed right out from under us.

This covers the zoning amendments that have been requested for this development, but there are still many more issues that I would like to voice my concerns over on this project.

Traffic

The traffic study done on the roads around the Juliana development site were certainly biased based on the time of the year they were completed. Traffic in the middle of summer is much lower than during the rest of the year. The site plan shows the main entrances to parking are off Douro and Trinity Streets.

Assuming a 50/50 split, that means on Trinity St. we are going to increase by an additional 196 cars per day.

- What happens when you combine the extra on-street parking, with the additional traffic?
- Do you widen the street to accommodate the extra traffic?
- If you do widen, which side of the street do you take it from?
- I think there is only one answer since, on the official plan of the Juliana development, buildings come right up to the road. Why should I lose some of my front yard to accommodate the developer?

Building Aesthetics

The Official Plan for Stratford (August 2015) states that the Goals and Objectives for High Density Residential Areas (4.6.1) should:

- To provide for the creation of new high density residential areas in locations which generally respect adjacent development.

Furthermore, from section 4.6.4:

- A mix of development forms and densities
- High density residential uses are:
 - Intermixed with medium density development and/or commercial, office and institutional components as part of mixed use developments;
 - Primarily street oriented in design; and
 - Located with direct access to collector and arterial roads, park and greenland areas, community facilities and/or commercial areas.
- Designed to ensure that there are no significant impacts with respect to privacy and shadowing, and that appropriate buffering can be provided for any adjacent land in the Residential Area designation;
- Size and scale of the development is such that it can be integrated with any adjacent residential areas, in particular conforms with the policies of Section 3.5, Heritage Conservation and preserves designated and listed heritage buildings and structures, where located adjacent to such buildings and structures is designed to be compatible; and
- Municipal services with the capacity to accommodate the proposed development are or can be made available.

I highlight these sections of the Official Plan for Stratford as there are several components that do not respect the existing adjacent lands.

- The new buildings are all of a very modern design. Their square angular designs do not fit in with the 1900's style surrounding residences.
- The townhouses that have been proposed are 3 plus stories (when you include the roof patios), and will be directly across from 1½ story existing houses. The existing houses will be dwarfed, particularly by buildings I and K from the developer's plan.
- The entire development looks like all the amenities of the plan are inward facing. Large buildings surround the outside of the block. Only those on the inside get the open space. With the new buildings it looks like they want to create a wall between the existing neighborhood and their modern city within a city.
- There have been shadowing studies completed on the development that show the impact of the buildings. When people moved into this area, they were all aware of the Krug Factory as an issue with shadows, and chose to live within the

shadow of the factory. The addition of 10 more buildings with high heights and shadows was not something we expected to be added to our neighborhood.

Green Space

The Juliana development does not appear to have much in the way of green space. Apart from the amenity courtyard and the parkette there is not much in the way of public open spaces.

- The parkette is significantly smaller than any of the buildings.
- The amenity courtyard has provisions for a single lane vehicle access.
- The Urban Design Brief by Martin Simmons Sweers Architects Inc, have shown what looks like a very green design. My questions about their design are:
 - How does a single row of trees along the parking areas constitute a green space?
 - Their picture shows green roofs. Who gets to use them? Will they get used? Will they even be created, and if so, will they be maintained into the future? Does a green roof 5 stories up really count as open space?
- The existing field at the Krug Factory has been used by the local kids for years to play ball or explore an urban natural landscape. With this being bulldozed, where are they supposed to play? The parkette is only a few square meters in size and surrounded by pavement on three sides, and the amenity courtyard will likely not be too inviting to the outsiders. This development is missing the opportunity to create a decent park for the existing and new residents.

Sewer Capabilities

I ask if the sewer systems can handle the extra water that will be produced from the site? It appears the plan is to modify the storm sewers in the area in front of the Krug Factory on Trinity Street to handle all of the runoff from the entire property. Many questions are raised about this idea:

- **WHO IS PAYING FOR THIS??** As a resident of Trinity Street, I don't think I should since it is not my idea to build a development. We just replaced the sewer system on Trinity Street about 17 years ago.
- Even with the proposed changes, can the system handle it? The open field on the site has been acting as a natural holding pond whenever it rains. Even the developer's geotechnical report confirms this. Paving over most of this green

space will stop that water holding capacity of the property and let the excess water run into storm drains.

- Why are there no holding ponds built into the development of this site? All other sites in the city seem to require them.
- In one of the reports, it states this upgrade 'should' be able to handle the 1 in 5-year flood event. That doesn't seem to be a very long storm period, we quite often hear about the 1 in 100-year storm events a couple of times a year. Especially with our modified environment with more intense storms.
- If the snow is piled on the parking areas or other paved areas, that excess snow melt is going to need to go somewhere. I assume from these plans it will go down the storm drain. Can it handle the snow melt on top of a significant rainfall?

Comparison to other Developments

I fully understand the need to infill underutilized properties within the city. I agree with this idea, but why are we still building new subdivisions out in the country that follow previous density rules? There are no high-density residential areas in any of these developments:

- Knightsbridge Development – Approx 12 Hectares – 63 Units
- Poet & Perth Development – Approx 11.5 Hectares – 392 Units
- Avon Park Development – Approx 20 Hectares – Unknown
- Festival West Development – Approx 11 Hectares – Unknown

Where is the push to make these high-density developments? Only one of them even comes close to the Juliana development in terms of units but is over 4 times the size.

Gaslighting

The Juliana project has been a masterclass in revealing only a bare minimum of information in order to avoid controversy and get this massive project approved. A fully above-board project should have nothing to hide. The information is available but has taken a lot of digging and persistence to get this far. Below are the many examples:

- The original neighborhood interviews last summer contacted 12 individuals. I was not interviewed so I do not know what level of detail about the plans were announced. Based on the report from the Baker Planning Group, it would seem most of the conversation revolved around keeping the Krug factory and the open space.

- A second interview process was taken in September, which included the invitation to the open house plus further discussion. Again, I was not interviewed, but based on the feedback from Baker Planning Group, the focus was still on the re-use of the old Krug Factory building. There were few mentions of the new buildings.
- The public open house gave us the first indications of what was planned for this site. At a first glance it seemed impressive, but after the fact the realities of it began to filter through. One of the comments that made it to the Baker Planning Group report about feedback from the community was 'the neighbors remarked they like the green space in the development with those living directly across from the proposed parkette happy to be fronting onto the new park space.' Since this was my family, I can comment about the rest of that sentence that was not included in the comments. It was a remark made to one of our neighbors who is going to be living directly across from one of the giant townhouses. We were sarcastically commenting that our situation was only slightly better than theirs. We were not endorsing this project.
- During the open house, many of the details on parking numbers, final building designs, traffic numbers, etc., were not available. It is difficult to give a proper opinion if not shown the whole story.
- The posted sign for the public meeting about the development is misleading. The only illustration is a rendering of the existing factory and what it could look like after development. There is no indication of what the rest of the new development will look like. The community is very positive about the redevelopment of the factory itself, there is little opposition to that part of the project.
- The original posted sign for the initial public meeting only provided 6 days to submit written comments about this plan. It was put up May 1st, with a deadline for comments of May 6th.
- The letters of notice of a change in zoning only went out to properties within 120 meters of the site. For a small project that involves a minor variation this might be appropriate. I understand that this is the regulations, but a project of this scale should be communicated to more people. It doesn't just affect the adjacent neighbors.
- The full plan is not available on the city's web site. Other communities that are working on similar controversial projects at least provide the full information on their web site. In Stratford you need to request it from the planning department

via e-mail or in person. Again, it is making the public work harder to find information that should be freely available.

- Any mention of this project on the news (TV, radio, City of Stratford web site) is strongly promoting the infilling of land for housing; re-using old industrial buildings, saving farmland, and sometimes affordable housing. In the case of TV and radio, that is only half the story because that is all they are being told. It wasn't until the issues with the cancellation of the City council meeting on May 28th that anything was even disclosed about this project. The city web site on this project makes it look like it is only about the factory redevelopment, as with the posted sign on the property, the picture on the web site is only the new factory elevation map. There is no mention of the 10-story apartment in the background that would dwarf the factory.
- With all of this withholding of useful information it has made for great mistrust between the public and the partnership between City Hall and the developers. How can we trust these plans are going to be followed in the future?

Conclusion

Despite this long list of issues, I am in favour of redeveloping the Krug Factory and its adjacent land. It just needs to be logical, fair, and fit into the existing neighborhood. It shouldn't be a modern city dropped into the middle of an older, established community.

Less Density

Less Height

More Green Space

More Open Communication

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Trinity Street