

**CONCERNS ABOUT PROPOSAL
TO CONSTRUCT A 6-STOREY 71-UNIT APARTMENT BUILDING
AT 131 Main Street, Sackville**

**Researched and compiled by
Sharon Hicks & Percy Best**

June 6, 2023

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June 6, 2023

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Times & Transcript - Paige Woodard
CBC - Harry Forrestall

Mt Allison Professor / past Sackville Councillor - Geoff Martin

And other concerned parties

1.1 - CONTENTS

| # | | # | | pg |
|----|-----------------------------|------|---|----|
| 1 | PRELIMINARY PAGES | 1.1 | Title Page | 2 |
| | | 1.2 | Contents | 3 |
| | | 1.3 | List Of Illustrations | 4 |
| | | 1.4 | List Of Charts | 4 |
| 2 | INTRODUCTION | 2.1 | Disclaimer | 5 |
| | | 2.2 | Research | 5 |
| | | 2.3 | Expectations | 5 |
| 3 | THE APPLICATION | 3.1 | Subject | 6 |
| | | 3.2 | What Council Is Currently Being Asked To Do | 6 |
| | | 3.3 | Basic Information From Presentation To Council Apr 24 | 6 |
| 4 | PROPERTY INFORMATION | 4.1 | Property Subdivision Information | 7 |
| | | 4.2 | Property Dimensions | 7 |
| | | 4.3 | Comparison Of Subdivision Plans & Satellite View | 7 |
| 5 | BACKGROUND INFO | 5.1 | Background – Current Zone | 8 |
| | | 5.2 | Background – Previous Application For Similar Project | 8 |
| | | 5.3 | Changes – Between 2014 And 2023 | 8 |
| 6 | PROCESS | 6.1 | Public Hearing – June 27, 2023 | 9 |
| | | 6.2 | Text Amendment Process | 9 |
| | | 6.3 | Potential Precedent | 9 |
| 7 | TAX INCENTIVE GRANT | 7.1 | Background – Tax Grant Established March 2020 | 10 |
| | | 7.2 | Discrepancy Discovered | 10 |
| | | 7.3 | Main Research Findings | 10 |
| | | 7.4 | Grant Formula | 10 |
| | | 7.5 | Comparison With Private Residential Construction | 11 |
| | | 7.6 | Tax Incentive Rebate Estimate For Current Proposal | 11 |
| | | 7.7 | Comparison With Other Locations | 11 |
| | | 7.8 | Implications For The Town | 11 |
| | | 7.9 | Conclusion from Research | 11 |
| | | 7.10 | Time-Sensitive Issue | 12 |
| | | 7.11 | Immediate Action Requested | 12 |
| 8 | HERITAGE ISSUE | 8.1 | Background – Heritage Bylaw Repealed 2018 | 13 |
| | | 8.2 | Heritage Protection Still Missing | 13 |
| | | 8.3 | Heritage Concern Directly Related to Current Rezoning Request | 13 |
| | | 8.4 | Importance of Heritage Protection | 14 |
| | | 8.5 | Benefits of Heritage Conservation | 14 |
| | | 8.6 | Heritage Properties | 14 |
| | | 8.7 | What Makes Sackville Special? | 15 |
| | | 8.8 | Implications of Having No Heritage Protection | 15 |
| | | 8.9 | Immediate Heritage Action Requested | 15 |
| 9 | SAFETY CONCERNS | 9.1 | Fire Lane Access | 16 |
| | | 9.2 | Increased Vehicular Traffic Congestion | 16 |
| | | 9.3 | Pedestrian Traffic | 17 |
| | | 9.4 | Bicycle Traffic | 17 |
| | | 9.5 | Comprehensive Traffic Study Needed | 17 |
| 10 | ADDITIONAL CONCERNS | 10.1 | Bylaw Jurisdiction | 18 |
| | | 10.2 | Issues with Subdividing / Rezoning this Property | 18 |
| | | 10.3 | Affordability Issue | 18 |
| | | 10.4 | Climate Lens | 18 |
| | | 10.5 | More Rezoning Issues To Consider | 19 |
| | | 10.6 | Similar Issues in Other locations | 19 |

| | | | | |
|----|-------------------------------|-------|---|-----------|
| 11 | PROPOSED BUILDING INFO | 11.1 | Proposed Building Compared with Previous Design | 20 |
| | | 11.2 | Proposed Development Design | 20 |
| | | 11.3 | Information About the Building | 20 |
| | | 11.4 | Building Footprint | 20 |
| | | 11.5 | Building Materials | 21 |
| | | 11.6 | Roof | 21 |
| | | 11.7 | Drainage Plan | 21 |
| | | 11.8 | Underground Parking | 21 |
| | | 11.8 | Indiscriminate Parking | 22 |
| | | 11.9 | Future Parking Considerations | 22 |
| | | 11.10 | Snow Removal | 22 |
| | | 11.11 | Questions regarding Non-Compliance | 22 |
| 12 | OTHER RELEVANT INFO | 12.1 | Economic Feasibility Question | 23 |
| | | 12.2 | Fire Hydrant Installation | 23 |
| 13 | HOUSING SHORTAGE | 13.1 | The University Effect | 24 |
| | | 13.2 | Current Rental Numbers | 24 |
| | | 13.3 | The 'Renoviction' Effect | 24 |
| | | 13.4 | Rental Future | 24 |
| | | 13.5 | Affordable Family Rentals Needed | 24 |
| | | 13.6 | What We Really Need | 24 |
| | | 13.7 | Alternative Option Ideas | 25 |
| 14 | CLOSING NOTES | 14.1 | Other Important Considerations | 26 |
| | | 14.2 | Summary of Main Issues Presneted | 26 |

1.2 - LIST OF ILLUSTRATIONS

| figure # | description | pg |
|-----------|--|----|
| figure 1 | diagram & information from Apr 24 th presentation to Council | 6 |
| figure 2 | subdivision plan diagram from notice of public hearing, with satellite view | 7 |
| figure 3 | detail from older site map showing property dimensions at 131 Main St | 7 |
| figure 4 | comparison of satellite image and subdivision plan diagram | 7 |
| figure 5 | photo of old carriage house on grounds of 131 Main st, and satellite view showing position | 13 |
| figure 6 | 2013 – former Mt A satellite residence, Cuthbertson house ... | 14 |
| figure 7 | 4 driveways / roadways all converging onto Mains Street ... | 16 |
| figure 8 | comparison of previously defeated design, and current proposed design ... | 20 |
| figure 9 | 131 Main St – lot plan, showing approximate size & scale of proposed building footprint | 20 |
| figure 10 | location of new fire hydrant and stand-pipe installed in 2022 at 131 Main St | 23 |

1.3 - LIST OF CHARTS

| chart # | description | pg |
|----------|--|----|
| chart 1 | Property Subdivision Information | 7 |
| chart 2 | Property Dimensions | 7 |
| chart 3 | R3 Zone Requirements | 7 |
| chart 4 | RHC Zone Requirements | 7 |
| chart 5 | Tax Rebate Grants in Other Locations | 10 |
| chart 6 | Tax Rebate Grant Formula (Sackville/Tantramar) | 10 |
| chart 7 | Tax Incentive Grant Rebate Estimate for Current Proposal | 11 |
| chart 8 | Comparisons With Other Locations (tax grants) | 11 |
| chart 9 | Action Requested (re: tax grant program) | 12 |
| chart 10 | Reasons Why Heritage Is Important | 14 |
| chart 11 | Traffic Study Needed | 17 |
| chart 12 | Climate Lens Focus Needed | 18 |
| chart 13 | Information About Proposed Building | 20 |

2. INTRODUCTION

2.1 DISCLAIMER

The persons who prepared this report have **no personal stake** in the development at 131 King St.

We do not own property near the proposed development.

We have nothing to gain or lose whether or not this project goes ahead.

What we do have is a keen sense of doing what is right for the best interests of the citizens of our Town.

When we see something which appears to be contrary to that principle, then we seek to 'fix it'. We gather information from as many sources as possible, and verify whether the information is accurate. Then we examine the information to determine whether there is anything which seems out of line, or which raises any red flags.

We also have a keen sense of our local history and heritage as well, and feel that it is important to preserve and safeguard what remains of our links to the past, in order to put the present and the future into perspective.

We recognize that more housing is needed in our municipality, in particular more affordable housing for families, but we don't agree with "any housing, anywhere" as a solution to the overall problem in our area.

2.2 RESEARCH

In this case, the initial information we looked at indicated this is a very complex scenario, with several different important factors intertwined in such a way that one cannot look at any one issue independently of the others.

They are all interconnected and relevant.

Each step in the research led to more questions, which in turn led to even more research and more information collected and examined.

2.3 EXPECTATIONS

This document outlines **questions and concerns** related to this proposed project, as it relates to **town finances, serious safety issues, and ecological issues**, in addition to the **potential impacts on a long-standing Heritage property**, and how such an **ultra-modern building's** presence would negatively impact the neighbouring properties in that lovely stretch of history and green space bordering on our Waterfowl Park.

There are few such areas remaining in our municipality, and they play an important role in maintaining our **'historic small-town' image**, which **attracts people to visit and to move here - and to remain here**.

Citizens look to our elected Council for **guidance**, to do the **research** on their behalf, to **ensure** that all decisions are made with the **best interests of all citizens** in mind.

Therefore, our expectation for Council is to carefully and thoughtfully review the information in this document, in light of how all the various issues are connected and intertwined, and to **consider the future implications and ramifications** which would result if this development project were allowed to move forward.

2. THE APPLICATION

3.1 SUBJECT

Proposal by John Lafford to build **6-storey 71-unit** apartment building on the back portion of his property at **131 Main St**, behind the historic "Fisher House" building.

3.2 WHAT COUNCIL IS CURRENTLY BEING ASKED TO DO ...

1. Change height restriction for R3 zone from maximum 50' to 65'.
2. Rezone rear portion of 131 Main St from RHC (Residential Historic Commercial) to R3 (multi-unit residential).

3.3 APPLICATION FOR TEXT AMENDMENT ...

Information included in the application for text amendment, as present to Council by Lori Bickford, April 24.

Figure 1 - screen capture showing diagram & information from April 24th presentation to Council

GENERAL INFORMATION

Applicant: same

Landowner: John Lafford

Proposal: A text amendment to increase the maximum height requirement in the Zoning By-law from 50 ft to 65 ft.

Also, to rezone a portion of the property (back portion) to R3 to allow a 71 unit multiunit dwelling.

SITE INFORMATION

Location: 131 Main Street, Sackville - Tantramar

PID: 00969048

Lot Size: 9,386 m² (2.3 acres); area to rezone approx 5,345 m² (1.3 acres)

Current Use: Residential

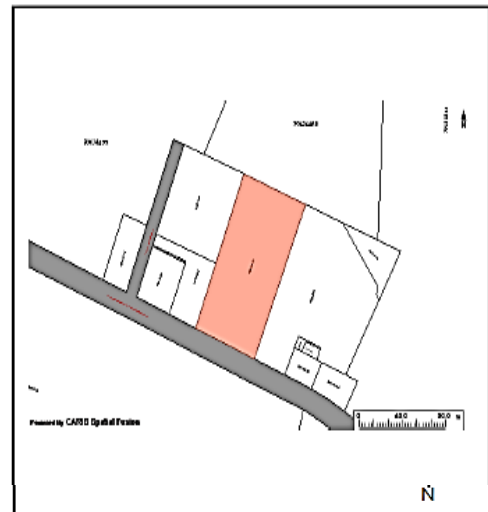
Zoning: RHC

Future Land Use: Urban Residential

Surrounding Use & Zoning: Residential historic commercial, institutional and high density residential.

Municipal Servicing: Full municipal Services are available

Access/Egress: Main Street



3. PROPERTY INFORMATION

4.1 PROPERTY SUBDIVISION INFORMATION

Figure 2 - subdivision plan diagram from notice of public hearing, with satellite view

Below left – diagram from Notice of Public Hearing ... posted on Town website.
Below right – satellite view from GEONB website, showing property lines.

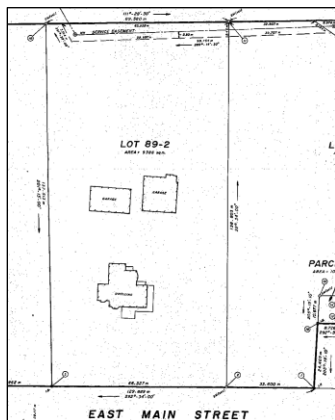


| PROPERTY SUBDIVISION INFORMATION | |
|---|--|
| PID number | - 00969048 |
| Property info: | |
| Lot size | 9,386 sq m (= 2.3 acres) |
| Area to rezone: | 5,345 sq m (= 1.3 acres) |
| Therefore: | |
| | 56.5% of the lot would change to R3 zone |
| | 43.5% would remain RHC zone |

Chart #1 - Property Subdivision Information

4.2 PROPERTY DIMENSIONS

Figure 3 - Detail from older Site map showing dimensions of property at 131 Main, and surrounding properties.
 (image is shrunk & cropped for this document ... exact measurements can be read when image is enlarged).



| PROPERTY DIMENSIONS (from site map at left) | | |
|---|----------------------|-------------------|
| - Rear width | = 69.58 m | = 226.1 ft |
| - Left side | = 137.513 m | = 446.9 ft |
| - Right side | = 138.803 m | = 451.1 ft |
| - Front width | = 66.327 m | = 215.6 ft |
| o Service easement at rear | | |
| - | 5.4 m from rear line | |
| - Adjacent property – Marshwinds Co-Op frontage (R3 zone) | = 33.600 m | = 109.2 ft |
| This complies with the 100' minimum frontage requirement. | | |

Chart #2 - Property Dimensions

4.3 COMPARISON OF SATELLITE VIEW AND SUBDIVISION PLAN DIAGRAM



| Minimums - R3 | |
|----------------------|-------------|
| Frontage | = 100 ft |
| Side yard | = 20 ft |
| Back yard | = 35 ft |
| Front yard | = 33 ft |
| --- | |
| Lot coverage | = max 33.3% |
| Building height | = max 50 ft |

Chart #3 - R3 zone requirements

| Minimums - RHC | |
|-----------------------|-------------|
| Frontage | = 60 ft |
| Side yard | = 9 ft |
| Back yard | = 25 ft |
| Front yard | = 25 ft |
| --- | |
| Lot coverage | = max 50% |
| Building height | = max 30 ft |

Chart #4 - RHC zone requirements

Figure 4 – Comparison of satellite image and subdivision plan diagram

Above - Left – image from GEONB satellite view of 131 Main Street, showing the actual current property perimeter lines (thin yellow lines). The superimposed heavier yellow lines show the proposed division of the property into 2 parcels - as indicated in the diagram on the **right**,

Above - Right – portion of diagram which was included in the Announcement for Public Hearing, on the Town's website, showing the portion of the property to be rezoned to R3.

Both diagrams are adjusted to the same scale, for comparison.

4. BACKGROUND INFORMATION

5.1 BACKGROUND ... CURRENT ZONE

- property is currently zoned **RHC** (Residential Historical Commercial).
 - Does not permit multi-unit residential buildings
 - Height of any buildings is restricted to 30 feet maximum.
 - = equivalent 2-storey home with pitched roof

5.2 BACKGROUND - PREVIOUS APPLICATIONS FOR SIMILAR PROJECT

- Former owner, the late **Gordon Beal**, applied twice to rezone the property to build apartment unit in **back**, most recently in 2014. He was **denied both times**.
- Beal's design met all the requirements of the by-law PLUS the requested historical design changes which the Heritage Board requested at the time.
- **It was designed to blend in** with the Georgian style architecture of the Fisher house in the front of the property, and with other nearby residences – such as the Marshwinds Co-op Housing units next door.

5.3 CHANGES - BETWEEN 2014 to 2023

What has changed since the Beal development was denied?

- **Name of the developer**
- **Heritage Bylaw was repealed in 2018**, and after 5 years there is **still no heritage protection**.
- **Tax Incentive Grant** was introduced in March 2020.
 - o **It could provide Laffords with a step-down tax rebate for municipal taxes over the first 10 years ... which in this case would amount to around \$1M.**
- Laffords have built 3 other large apartment buildings on the site of the former United Church.
- The **provincial government** has cut the provincial tax portion by 50%, for rental units, **which further reduces the total tax which would be paid on this property**.
- Current shortage of rental units
 - o Which **could be a temporary housing shortage**, due to MtA students renting in town while one of the residences, Harper Hall (which normally houses **well in excess of 100 students**) is fully **closed** for major renovations.
 - That residence is **supposed to open again in fall of 2024** - and then perhaps there won't be the shortage that we're seeing right now ...

5. PROCESS ...

6.1 PUBLIC HEARING - June 27, 2023

- Part of the scheduled Committee of the Whole meeting, held at 3:00 pm
 - o Should be a **separate meeting** ... instead of being squeezed into a regular meeting
 - Will people only have 5 minutes to speak?
 - Will there be a limit on number of people who can speak?
 - Will people have to register their questions before the meeting?
 - o **Should be held in the evening**, rather than afternoon
 - Many people who would otherwise attend will be at work
- Need to be prepared for possibility that Laffords could have people there from their rental list, to speak in favour of the development ...
 - o which could commandeer the time allowed, resulting in those who object not having enough time to voice their concerns.
 - o Therefore one needs to have appropriate time for those who wish to speak at the meeting.

6.2 TEXT AMENDMENT PROCESS

- Part of the process of adding a text amendment involves notifying the owners of the neighbouring properties about the proposed change.
- Adding a text amendment for the R3 zone **would affect ALL R3 zoned properties** in town.
- THEREFORE - the Regional Service Commission will have to send notifications to all owners of property within 300 feet on **ALL R3 zoned properties** in town.

6.3 POTENTIAL PRECEDENT

Council is being asked to first pass a motion to allow a text amendment to increase the maximum building height for ALL R3 zones from 50' to 65', and **then** to pass a second motion to allow rezoning part of the property at 131 Main St from RHC (Residential Historic Commercial) to R3 (Multi-unit Residential).

However, if the initial amendment motion were to pass first, and then the second motion dealing with the rezoning were to fail, then the **maximum height for ALL zone R3 properties would still be changed to 65'**.

That would mean that any person could then build to that height on any property zoned R3, without needing any further amendments.

That is why it is **imperative that ALL neighbours of all R3 properties** need to be notified about this requested **major R3 zoning change**. This is accordance with the existing process for text amendments on the zoning bylaw.

6 TAX INCENTIVE GRANT

7.1 BACKGROUND – INCENTIVE GRANT ESTABLISHED MARCH 2020

In March 2020, Sackville Council adopted an **economic development incentive program** to provide rebates of a portion of the developer's municipal property taxes over periods of 5 or 10 years, depending on the development cost.

Here is the link to the full article as it was reported at that time, in WarkTimes

- <https://warktimes.com/.../laffords-could-benefit-from.../>

Jamie Burke, then Senior Manager of Corporate Projects, initiated the grant program in Sackville, and said it would be based on Council '**approving an application from a developer before a building development permit is issued**'. The grants would be restricted to the following zones:

- o **MU** (mixed commercial/residential)
- o **R3** (dense urban residential)
- o **IND** (industrial)
- o **HC** (highway commercial)

Burke suggested to Council that '*as long as the proposed development was in one of the target zones, then it didn't appear the request could be denied by Council*'. He reported to Council that this grant program would be **in line with the grants in Moncton and Riverview**.

7.2 DISCREPANCY DISCOVERED

We recently **checked with Moncton and Riverview**, as well as Shediac, Dieppe, and Amherst, and we found **significant differences** between their grants and the program which Sackville instituted in 2020.

Riverview - we spoke with Annette Crummey, the Town Clerk, and she verified that they have **NO TAX INCENTIVE for multi-unit residential development, UNLESS at least 50% of the ground floor is dedicated to Commercial enterprises. For developments which are strictly Residential, there is no tax incentive at all.**

Moncton - as in Riverview, the tax incentive is granted for developments **which include Commercial space**, but not for multi-unit fully Residential.

Shediac - they have a **modest incentive for multi-unit fully Residential development**, and a much larger incentive for Commercial development.

Dieppe - there is a focus on developing **Commercial and Industrial properties** in the main downtown core, with various levels of incentive grants for different areas, with some **modest incentives** for fully Residential developments.

Amherst - similar to Dieppe. Tax rebate incentives are **mainly** intended for Commercial and Industrial development, but **not for exclusively Residential properties**.

Chart #5 - Tax Rebate Grants in Other Locations

7.3 MAIN RESEARCH FINDINGS

In short, the **main difference** is that Sackville's program provides the very generous tax rebate grant for **all types of development, including strictly multi-unit Residential, while most of the other locations do not.**

Those which **do** provide some sort of grant for **exclusively multi-unit Residential developments** (Apartment buildings) do so on a **much smaller scale** than what Sackville's grant program allows.

7.4 GRANT FORMULA

This is the formula which is used to calculate the amount of tax incentive grant which a developer will receive.

Basic calculation - cost of construction (as stated on the building permit)
 x % of commercial building x 0.0234 (current mil rate for commercial tax)
 + % of residential building x 0.015 (current mil rate for residential tax)

For projects under \$5Million cost - 5 year program
 Year 1 = 90% of tax is rebated as a grant,
 yr 2 = 80%, yr 3 = 60%, yr 4 = 40%, yr 5 = 20%.

For projects over \$5Million cost - 10 year program
 Year 1 = 91% of tax rebated as a grant, yr 2= 82% / yr 3= 73% / yr 4= 64% /
 yr 5= 55% / yr 6= 45% / yr 7= 36% / yr 8= 27% / yr 9= 18% / yr 10= 9%.

Chart #6 - Tax Rebate Grant Formula

7.5 COMPARISON WITH PRIVATE RESIDENTIAL CONSTRUCTION

There are **no tax incentive grants for private home constructions**, so does it make sense for our Town to subsidize half of the municipal property taxes for a major fully residential development for a period of 10 years? The developer will already be reaping the benefits of the recently introduced provincial property tax rebate for 50% of the provincial portion for rental properties.

7.6 TAX INCENTIVE REBATE ESTIMATE FOR CURRENT PROPOSAL

After verifying with the Town Treasurer that I was applying the formula correctly, we then prepared the following example, using a realistic estimate for the value of the current multi-unit **residential development** being proposed. **6 storey multi-unit apartment building, 71 units**

| | |
|--|------------------------|
| Reasonable cost estimate of \$200,000 per unit , on average, = estimated total of \$14Million . $\$14M \times .015 = \$210,000$ base tax per year. (= total \$2,100,000 over 10 years) (based on current mil rate). | |
| Year 1 – 91% rebate = \$191,100 | (tax paid = \$ 18,900) |
| Year 2 – 82% rebate = \$172,200 | (tax paid = \$ 27,800) |
| Year 3 – 73% rebate = \$153,300 | (tax paid = \$ 56,700) |
| Year 4 – 64% rebate = \$134,400 | (tax paid = \$ 75,600) |
| Year 5 – 55% rebate = \$115,500 | (tax paid = \$ 94,500) |
| Year 6 – 45% rebate = \$ 94,500 | (tax paid = \$115,500) |
| Year 7 – 36% rebate = \$ 75,600 | (tax paid = \$134,400) |
| Year 8 – 27% rebate = \$ 56,700 | (tax paid = \$153,300) |
| Year 9 – 18% rebate = \$ 37,800 | (tax paid = \$172,200) |
| Year 10 – 9% rebate = \$ 18,900 | (tax paid = \$191,000) |
| Totals - rebate \$1,050,000 | tax paid \$1,050,000 |

Chart #7 - Tax Incentive Rebate Estimate for Current Proposal

7.7 COMPARISON WITH OTHER LOCATIONS ...

Tax Incentive rebates in the other areas we checked are primarily to **encourage Commercial and Industrial** development and growth. Where there is any incentive for **Residential** buildings they generally require a portion of the building to have **Commercial or Retail** space on the ground floor.

| | |
|---|---|
| For the same development figures used above - \$14M, 6-storey, 71 units, fully residential , here are the comparative results for the following locations: | |
| SACKVILLE | - \$1,050,000 rebate - over 10 years |
| SHEDIAC | - \$ 210,000 rebate - single payment (very small, compared to Sackville grant) |
| DIEPPE | - \$ 193,866 rebate - single payment (very small, compared to Sackville grant) |
| RIVERVIEW | - \$ 0 rebate - (verified by Riverview Town Clerk Annette Crummey) |
| MONCTON | - \$ 0 rebate - |
| AMHERST | - \$ 0 rebate - |

Chart #8 - Comparison With Other Locations (tax grant)

7.8 IMPLICATIONS FOR THE TOWN

In essence, the Town would see new revenue on an increasing sliding scale for 10 years, as indicated in chart #7 above. That revenue would be balanced for 10 years by the decreasing sliding scale of the rebate each year, also shown in chart #7.

The bottom line is that over the course of 10 years, the Town would end up rebating approximately 50% of the total municipal tax for that property, or a little more than \$1M for this particular fully residential development. So in effect they would receive approximately 5 years tax-free.

7.9 CONCLUSION FROM RESEARCH

It seems clear now that **Council was misled in 2020**, by being told the grant program was modeled after those of Riverview and Moncton. Our research indicates that is not the case. Sackville’s grant policy for **fully Residential** developments is far out of line with what the other nearby municipalities offer, which means our Town municipal property tax payers will be **subsidizing multi-unit fully residential developments**.

7.10 TIME-SENSITIVE ISSUE

This issue is Time-Sensitive, considering the **potential financial ramifications** should the request by Lafford Realty be approved with no changes to this policy.

7.11 IMMEDIATE ACTION REQUESTED

We request that Tantramar Town Council immediately **re-evaluate the parameters of this tax exemption grant**, and **compare it realistically** with the grant programs of **Riverview and Moncton**, since those were the locations cited by Mr Burke as having **similar programs**.

This needs to be corrected, in order to be fair to the municipal tax payers, and **bring our grant program into line with what those other municipalities are actually doing**.

Again, it is the responsibility of our elected Council to represent the financial and other interests of the citizens of the Town of Tantramar, with proper research and due diligence prior to every decision, and to amend any previous errors if they are found to have been based on incorrect information.

Action requested:

- **Review** the actual grant information from Moncton & Riverview ...
- **Compare** that information with what Council was told in 2020 ...
- **Amend** the policy so it lines up with the stated goal at that time -
le - to be 'more in line' with Moncton and Riverview.

Chart #9 - Action Requested (re: tax incentive grant)

7 HERITAGE ISSUE

8.1 BACKGROUND – HERITAGE BYLAW REPEALED 2018

- In 2018, just a few days before John Lafford received the building permit for his most recently built apartment development (the one that looms over Academy Stretch) the **Heritage Bylaw was repealed**, with nothing to replace it.
 - o Without that bylaw in place, the Heritage Board therefore was dissolved, since the one cannot exist without the other.
- Since 2018, the question has been raised numerous times as to **when we could expect to have a Heritage Bylaw replacement** - which we were told in 2018 would happen “right away”.
 - o Each time the question has been asked (a few times each year, by several people), the reply was always the same (provided by Jamie Burke) –
 - **“We’re working on it, and it will be ready very soon.”**

8.2 HERITAGE PROTECTION STILL MISSING ...

- Now, **5 years later**, in 2023, we **STILL have no Heritage bylaw in place**, so again there are **no restrictions on style appropriateness, green space, materials etc** for buildings.
 - o That opens the door for any developer to move in and gradually delete what remains of the intrinsic historical charm which makes Sackville what it is.

Much importance over the past few years has been placed on Climate Change and Environmental Issues by our Town Council, and our Heritage has unfortunately fallen through the cracks.

Research which was done a few years ago determined that Sackville (and now Tantramar) appears to be **one of the very few, if not the only, incorporated municipality without any form of Heritage protection**. Without such protection, many essential features which define the character of a community can - and will - be lost. Our identity is at stake.

8.3 HERITAGE CONCERN DIRECTLY RELATED TO CURRENT REZONING REQUEST

There is a **historical building** - (the original **CARRIAGE HOUSE**) on the grounds at 131 Main St.



It is located on the lovely open expanse of green space between the historical main building, which is commonly known as the Fisher House, and the adjoining Marshwinds Co-Op housing property.

That strip of green space (including this building) is **included in the portion to be rezoned** as R3, in order to construct a roadway from Main Street, to access the rear portion of the property.

Figure 5 - photo of old carriage house on grounds of 131 Main St, and satellite image showing its position

Above left - the old Carriage house t 131 Main St

Above right – location of the carriage house on satellite image of the property.

With the **zone designation of RHC (Residential Historic Commercial) the carriage house currently has ‘inherent’ heritage protection.**

- **BUT** - If that portion of the property is **rezoned to R3**, without any Heritage Bylaw in place, that lovely building will lose its ‘historic’ designation and could very likely be demolished to make way for the new access roadway.

This carriage house is one of the few remaining examples from the bygone era of horse & carriage transportation. The carriage(s) would be stored in this building, and the horse would be hitched to the carriage, and then be driven out of the building.

This fine example of skilled craftsmanship is still in excellent condition, with a very expensive roof which mimics clay tile but is far more durable, being made of metal shingles coated with stone granules. It sits on a solid concrete block foundation.

Note - The buildings in the **Marshwinds Co-Op housing development** were **patterned after the basic shape of this carriage house, by architect Robert Eaton**. This gives it **even greater historical significance**.

8.4 IMPORTANCE OF HERITAGE PROTECTION

Why is Heritage important?

Our **heritage provides links to our past** and clues to **how our community has evolved**.

- It gives us a connection with our past, so we can **examine our history and traditions**.
- It enables us to **develop an awareness about ourselves**.
- It helps us to **understand and explain why we are the way we are**.
- It gives us a **foundation** forged by our forebears, upon which we can **build for the future**.

Chart #10 - Reasons why Heritage is Important

8.5 BENEFITS OF HERITAGE CONSERVATION

Heritage conservation is about **managing change**.

It is planning based on the **inherited culture and cultural artifacts of a place**.

It means **assessment, interpretation, conservation, documentation, and strategic management**.

Rehabilitating heritage buildings is an effective strategy for revitalizing older commercial or residential areas.

Investing in the preservation, rehabilitation and ongoing use of heritage buildings and other historic places has economic benefits for both individuals and communities.

Heritage conservation can result in higher property values, increased tax revenues, revitalized neighbourhoods, and a greater potential for economic growth.

8.6 HERITAGE PROPERTIES

Basically, a **heritage property has historic, aesthetic or social features worth preserving** for generations to come. A heritage property is an **example of our cultural history that connects us to the past**.

Historic places embody traditional building skills and craftsmanship, so conserving historic places provides opportunities to learn and use these skills, to ensure they are preserved and passed on.

Owning a heritage property is an investment in our local history and community stewardship.

A **Heritage Impact Statement (HIS)** is a **document that sets out the impact that a development will have on the heritage values of an item, place or conservation area**.

It states:

- **why** the item or area is of heritage significance.
- **what** impact the proposed works will have on the item or area's heritage significance.

Studies show that rehabilitating heritage buildings has a greater economic impact than new construction.

One good example of this is the former Cuthbertson house on York Street, which had previously been used for many years by Mt A for student housing. It had stood vacant for 2 years before it was sold in 2013 as 'excess inventory', when the university decided it was too costly to maintain.

Rather than see it demolished, local Sign & Graphics owner Jim Throop, purchased it and moved the 115-ton building a short distance up the street.

He bought the house and recycled it "**because of its historic value**", and because to do so would be "**more environmentally friendly than building a new house**."

Throop sees properties like this as being "**part of the fabric of who we are**", and said he was grateful to the university for allowing him to "**rescue the property**."

Throop did extensive **restoration** work on the house, to "**keep the character of the house and the period**", and now rents 15 rooms to off-campus students.

This was the 2nd such historical older home which Throop rescued from the University. In 2007 he did the same with another former University residence.



Figure 6 – 2013 – the former Mt A satellite residence, Cuthbertson house, was sold and moved to a new location by purchaser Jim Throop, to be restored and improved, then rented to off-campus students.

8.7 WHAT MAKES SACKVILLE SPECIAL ...

- In a nutshell, **Sackville is not a 'modern urban setting'** - people come here to get away from that ...
 - o If we allow too much large-scale urbanization to happen, we will lose that intrinsic appeal.
- This proposed apartment building would be the tallest residential building in town ...
 - o Even our closest neighbour Amherst does not have any residential developments of that scale ...
 - o They prefer to build **garden home 'communities'**, which are very practical for renters of all ages and abilities.
 - o There are similar garden homes here in Sackville as well - some of which are owned by the Laffords
 - Therefore they do have the option to construct more of those, rather than a hi-rise apartment building, and blend them in with the adjacent Co-Op housing project which currently has a 6-year waiting list. .

8.8 IMPLICATIONS OF HAVING NO HERITAGE PROTECTION

One of the many **recognized threats** to maintaining an area's heritage is **uncontrolled urbanization**.

Without such protection in place, there is nothing to prevent a developer from moving in and eliminating more of what is left of our local historical properties.

After 5 years, it is **inexcusable that nothing has been done** to follow through on what Mr Burke repeatedly told the public since 2018 would be done.

8.9 IMMEDIATE HERITAGE ACTION REQUESTED

1. We are requesting that **Tantramar Council implement a Moratorium on further development** in any **Heritage / Historical areas** until a new form of **Heritage protection** is in place.

This would apply to any properties / buildings located on land which is zoned RHC - Residential Historic Commercial, and would include the property at 131 Main Street.

This is very important, before any further historical properties or buildings can be destroyed.
2. **Develop and adopt a basic Heritage policy** to replace what was lost in 2018, until such time as a fully-developed plan can be brought into place.

We were repeatedly told that it was being worked on for the past 5 years, so there should be ample information available as to what steps have been taken so far. That could then be used as a base from which to further expand upon.

If it was not being worked on, while we were told it was, then that issue would need to be addressed as well.

9 SAFETY CONCERNS

9.1 FIRE LANE ACCESS ...

- According to a site map for 131 Main St, the width of the lot at the approximate location where the building would sit.
- building lot at the rear is approximately 220 feet wide. The plan submitted for rezoning purposes shows the building length would be 189 feet.
- It appears that fire trucks will not be able to access the sides and rear of the building.
- **Will the RSC evaluation include input from the Fire Marshall, as to safe access for firefighting equipment ... part of RSC determination?**

9.2 INCREASED VEHICULAR TRAFFIC CONGESTION

From the previous section it's clear that the roadway leading from the street to the back portion of the property would most likely be located in the center of the long strip of green space, and through the existing Fisher carriage house, as shown on the image below.

The most likely location of the roadway is indicated below - shown in light blue-gray. The width is scaled using the Co-Op driveway next door, which is a 2-lane roadway.



With the 2 existing driveways at the Fisher house property, and the existing Marshwinds Co-Op driveway, plus a driveway for the proposed development, there would be **FOUR driveways accessing and exiting onto Main Street, in the same general area.**

This development which Mr Lafford is proposing would create a traffic congestion situation similar to the congestion at **Exit 504**, in the **Wright St / MacDonald's / Mallard Drive** area.

It would also be similar to traffic congestion at **Main & King, with the mini mall and Drew Nursing Home** driveways converging onto Main St in a small area.

This **needs to be a high priority for consideration**, and needs to be resolved in order to prevent a similar situation.

Figure 7 - 4 driveways / roadways all converging onto Main Street on the north side of the street. There is **also the double-ended driveway into the Music Conservatory**, on the south side of the street, in the same vicinity.

This is **already a high-traffic area for vehicular traffic**, and it is not too far from the blind corner (next to the raised cemetery) which leads to the downtown core.

The proposed **71 apartment units would likely account for approximately 100 cars** entering and exiting onto Main Street on a regular basis, adding that much more traffic density and congestion to the area. That doesn't even take into account additional vehicles from visitors to the residents in the new building, or delivery vehicles, or service vehicles.

It could conceivably warrant the addition of a traffic light in that area.

9.3 PEDESTRIAN TRAFFIC

In addition to vehicular traffic, there would be increased pedestrian traffic as well.

A lot of Mt A students, as well as seniors, already walk in that area.

With that many more people living in the proposed new development, it is reasonable to foresee a dramatic increase in the number of pedestrians in that area. That means more people crossing the street. A senior citizen was killed not that long ago, while crossing Main Street at the corner of Main and Rectory Lane.

On either side of the Swan Pond (Lily Pond), there are 2 pathways which students and others use as a shortcut to get from that section of Main Street to York Street, without having to go around the corner by Cranewood, where there is a sidewalk on only one side of the street. One of those pathways, which crosses the little stone bridge and is located very close to the most recent Lafford apartment building, has existed for many generations, as evidenced by the fact it shows up on the 1862 Walling Topographical Map.

In addition, the congregation of St Paul's United Church, next door to the Marshwinds Co-Op Housing Development, park on both sides of the street in that area, with those parked on the south side of Main Street (by the Lily Pond) then crossing the street to get to the church. There again, this presents more opportunity for mishaps to occur if there are an extra 70 – 100 cars coming and going from this new proposed development.

9.4 BICYCLE TRAFFIC

With the current trend toward encouraging more 'green transportation', more people are using bicycles to get around town. It's reasonable to assume that a good percentage of residents in that proposed building would make use of this mode of transportation. This would also include electric bicycles, mobility scooters, etc, which are all on the increase.

More bicycles etc on this already-busy street - made even busier with the additional traffic from the proposed building - means a greatly increased potential for serious mishaps to occur.

9.5 COMPREHENSIVE TRAFFIC STUDY NEEDED

There needs to be a **thorough traffic study** carried out, **before any rezoning decision can be made**. Such a traffic study could include all of the above-mentioned traffic congestion areas.

To determine how **extra vehicles from the apartment building** will affect traffic congestion ...

To determine how **extra pedestrian traffic** would impact overall traffic congestion ...

To determine how **future bicycle traffic**, both standard and electric, would impact congestion ...

To evaluate **safety measures needed** to protect pedestrians and cyclists ...

To determine what **added insurance risk** this increased congestion might mean for the Town, if the proper steps are not taken to ensure safety.

To **avoid the same type of previous / existing traffic congestion issues** ...

- **At Exit 504 area.**
 - with Wright St, MacDonald's, Irving, Mallard Drive and Tim Horton's all converging onto Main St so close together ...
- **At the corner of Main & King,**
 - with King St, the mini-mall driveway, and the Drew Nursing Home driveway, all converging onto Main St so close together ...

Chart #11 - Traffic Study Needed

10 ADDITIONAL CONCERNS

10.1 BYLAW JURISDICTION ..

This **developer is attempting to modify the existing zoning requirements** to suit what he wants to do, rather than plan a development which complies with the existing regulations.

Town bylaws, in particular the Zoning Bylaw, have been developed for good reasons.

Council and citizens are not happy about the Province's current move to take over control of town bylaws.

Is that not the same as what is happening when an individual developer attempts to make changes and set the standards for the town's building bylaws and zoning requirements?

It is the **responsibility of Council to decide what the town bylaws will include, and not up to an individual developer to determine what the regulations will be.**

10.2 ISSUES WITH SUBDIVIDING / REZONING THIS PROPERTY ...

- Subdividing would 'carve up' / 'mutilate' the front portion of this **historic property** ...
 - o Would eliminate the approximately 75' strip of **green space**, and replaced with a paved roadway.
- Based on the indicated dividing lines for the subdivision as shown in the plan which was submitted, the parking spaces behind the Fisher House would be part of the R3 portion.
 - o it appears the division would not leave sufficient parking spaces to accommodate the needs of the Fisher House.
 - o If Mr Lafford were to follow through on his stated plan to turn the Fisher House into a Hotel, then there would need to be even more parking.
 - Where would that parking area be placed? On the front lawn?
- R3 zone requires **100 ft frontage** ... diagram provided by RSC does not comply with that ...
 - o In order to have the plan approved, there would have to be another text amendment to change the minimum frontage requirement from 100' down to approximately 75'.
 - IF SO - that would **also** apply to ALL R3 properties ...
 - And would also require notification of all property owners within 300' of R3 properties.
- **Historic carriage house** sits on the portion of land which is requested to be rezoned to R3.
 - o Its location coincides with path of proposed roadway into the back portion of the property ...
 - o Would that building be demolished to make way for the roadway?
- Once an historical structure is gone, it can never be retrieved.
 - o Therefore it is VERY important to **consider all repercussions** before allowing this to happen.

10.3 AFFORDABILITY ISSUE

- The 18 "affordable housing" units are listed as "proposed", this is not a guarantee.
- Lafford's website indicates the current rents for their most recent building, the one which backs onto the Academy Stretch portion of Main St, is up to **\$2100 for a 2-bedroom unit**, and just under **\$1200 for a 1-bedroom**.
- Need to determine what Mr Lafford means by "affordable" ...
 - o Most "affordable housing" is managed by the CMHA (Canadian Mortgage and Housing Association), and it is usually subsidized.
 - o **CMHC defines "affordable" as 30% of household income to be spent on housing.**
 - Using that guideline, a person earning **\$50,000 per year would be able to afford \$1250. / month for rent**, while a person earning **\$25,000 per year would be able to afford \$625.**
- Shouldn't the town get some sort of guarantee that those units would REMAIN affordable ... it should be a part of the actual agreement.
- What we really need is true affordable housing suitable for families with low incomes. A family is certainly not going to live in a small 1-bedroom apartment such as what is being offered in this proposal.

10.4 CLIMATE LENS

This concept, adopted by Council, needs to be applied to this particular proposal application.

Buffer zone between properties ?
Green space preservation ?
Water runoff from property and building ?

Chart #12 - Climate Lens Focus needed ...

10.5 MORE REZONING ISSUES TO CONSIDER ...

- The current zoning by-law requirements were put in place for valid reasons, and **should not be considered just a “simple text amendment”** to change them - **much consideration** is needed first - just as **was done when these bylaws were developed**. Due diligence needs to be done.
 - o **Building height was set at maximum 50 feet, following the tragic December 1941 fire** at the Mt A men’s residence where 3 young student officer trainees lost their lives.
- Current zoning of this property, RHC (Residential Historic Commercial), only allows maximum building height of 30’.
 - o **THEREFORE, the request is ACTUALLY applying to change this property from 30’ to 65’.**
- If the height limit is changed for **THIS** R3 zone, it will be changed for **ALL** R3 zones.
 - o This involves **notifying all property owners within 100 m (approximately 300 feet) of ALL R3 zoned properties within the Town of Tantramar, prior to the Public meeting on Tuesday June 27.**
- The drawing included in the request for rezoning certainly does not provide enough information.
 - o There should be architectural drawings **showing the building in context with its surroundings**, so Council and citizens can clearly see what the proposal really is.
 - o Such increased details need to be made available to the public and to Council **well in advance of the meeting**. We all need time to reflect on facts in order to come to a full understanding of what is proposed.
- If the **underground parking garage** is exposed in the back (as it is with the last building they did), that **could raise the overall building height to around 85’ total height**, if a peaked roof is added as well
 - o The **peaked roof was not included in the drawing**, but the **written information indicates the building complies with that bylaw requirement**.
 - o So - **would a further text amendment be required** to add extra height for the additional height for the proper roof configuration?
- We have **different zones for very good reasons** - eg - an **Industrial development** would not be put in the middle of an established single family residential sub-division.
 - o Similarly, **this proposed extra-tall apartment building does not comply with the current zoning regulations**, and would certainly **not ‘blend in’** with the surrounding neighbourhood.
- According to information recently received from the **Regional Service Commission**, the **5 different sets of zoning regulations which apply to the 5 different entities** which were amalgamated into Tantramar will need to be replaced by a single zoning bylaw to cover the entire Tantramar municipality.
 - o Because of the **complexity** involved, it is **estimated that it could take up to 2 years** to do that.
 - Therefore, any zoning bylaw changes made at this time could theoretically end up being replaced once that new bylaw is in effect.

10.6 SIMILAR ISSUES IN OTHER LOCATIONS

Other locations have been dealing with somewhat similar propositions as well, as more developers seem to want to focus on building taller and higher-density residential apartment buildings, to cram as many people as possible into the smallest possible footprint. This is generally done to maximize the developer’s Return on Investment.

While this trend seems to benefit larger urban areas, it’s certainly not in the best interests of smaller more rural areas - such as Sackville / Tantramar.

Example - from a recent CBC article -

- London ON - A developer proposed a tall residential building which didn’t comply with existing bylaw.
- Developer applied to change the bylaw to allow him to **build what he wanted, rather than comply** with the current zone requirements.
- Council discussion raised issues which closely mirror those of local citizens here, about the proposed building at 131 Main St ... such as:
 - o Increased traffic congestion
 - o Inappropriateness of the building for the area
 - o **‘takeaway’ comment - They felt it is important to “ensure it is COMPATIBLE with the surrounding neighbourhood”.**

11 PROPOSED BUILDING INFORMATION

11.1 PROPOSED BUILDING COMPARED WITH PREVIOUS DESIGN WHICH WAS DENIED

At 71 units, this proposed building is nearly 4 times the size of the 18-unit building which the late Gordon Beal had proposed.

The size of the units in the new proposal do not appear to be intended for families, so it seems they must be aiming for young working professionals, and seniors with comfortable pensions.



Gordon Beal's defeated design ...



Laffords proposed new design ...

Figure 8 - comparison of previously defeated design by Mr Beal, and current proposal by Mr Lafford, to emphasize the disparity in their design suitability for the area.

11.2 PROPOSED DEVELOPMENT DESIGN

- The current proposal by Laffords appears to be basically a **'concrete box'**, similar to those we see in larger urban areas. The diagram above, submitted with the application for rezoning, shows a flat roof.
- At 6 storeys, the new building would tower over the units in the Co-op housing development next door, **looking down from the balconies into the backyards and the windows of the Marshwinds Co-Op homes.**

11.3 INFORMATION ABOUT THE PROPOSED BUILDING

- 6 storeys / 71 units
- 24 x 2 bdrm + den (corner) @ 1400 sq ft
- 12 x 2 bdrm + den @ 1087 sq ft
- 17 x 1 bdrm + den @ 898 sq ft
- 18 x 1 bdrm @ 692 sq ft

.. Building length 189 feet, building width 82 feet (as noted on building plans submitted with the request)

11.4 BUILDING FOOTPRINT

This was calculated from the building floor plan diagram included in application for rezoning, presented to Council at the meeting on Apr 24, 2023.

From the figures available on that diagram, it states the building would be **82' wide** and **189' long**.

The **approximate footprint of the building as it might sit on the property** is shown at right (**blue rectangle**), shown to as close a scale as can be determined from the available information.

Based on those figures, that would leave about 15' clearance on either side of the building.

That would **NOT meet the minimum R3 requirement of 20' for side yard setback.**



Figure 9 - 131 Main St – lot plan, showing approximate size and scale of proposed building on the rezoned portion of the lot.

11.5 BUILDING MATERIALS ...

- The plan says it is 'concrete construction' ...
 - o Is that pre-cast concrete slabs?
 - o Or is it Styrofoam forms filled with concrete? (ICF - Insulated Concrete Forms)
 - popular building method currently used in many commercial and domestic buildings
 - the Styrofoam itself is **not impervious to fire** ...

11.6 ROOF

- **Style regulations for R3 zone stipulates there must be a "sloped roof"**... aka "pitched roof".
- In the written description of the new proposal, found on page 16 in the Agenda package for the April meeting, it states that it "**meets the requirements for a pitched roof.**"
- However, the drawing appears to show a **flat roof with a wide sloped exterior perimeter fascia, with smaller accent corner parapet roofs**. That is not a sloped roof, so it appears not to comply with the bylaw.
- 6 floors of residential units PLUS a peaked roof (unlike the flat roof shown in the drawing) could extend the height to approximately 80 feet (to roof peak). That would exceed the proposed extended 65' maximum height for R3.
 - o So, would that mean a further bylaw amendment to extend the height even further?

11.7 DRAINAGE PLAN

- For 1st year the runoff will be muddied - from construction's disturbance of soil.
- With the **large footprint** of the proposed building, plus **extra parking** spaces required, plus a **roadway** from the street to the rear part of the property, plus whatever **extra parking** is needed for the existing house (to replace the parking which would be rezoned), there will be a **LOT less grass or ground** remaining to absorb rainwater. Pavement doesn't absorb water, so it will have to go 'somewhere' ...
- Where will the stormwater drain to?
 - Normandy Sports Field?
 - Sackville Waterfowl Park?
 - Marshwinds Co-op housing property?

11.8.. UNDERGROUND PARKING ...

- It would appear that the floodplain extends right up to the parking lot surface in back of the Fisher house, so at what elevation would the floor of the underground parking garage have to be?
- Given the slope of the land, it is likely that part of the underground parking garage wall would be exposed at the rear of the building, similar to the most recent Lafford development across Main Street from this new proposed location. This would add extra visible height to the already-tall building, which could take it even further over the maximum height allowance.
- Would there be EV chargers in the garage?
 - Potential Electric car fires in the garage ... this has been known to happen in closed spaces ...
 - Hard to get at the batteries – 'sealed unit' batteries usually require submersion to extinguish the fire, and sprinkler systems would have basically no effect at all.
 - Difficult to get fire department equipment to the rear of the building ...
 - It may be next to impossible to put out an EV fire in the underground parking garage.
 - The fire would likely burn for hours and would readily spread to other vehicles there.
- Possibility of around 100 vehicles for tenants in 71 units - many couples have 2 vehicles.
 - Underground parking for 54 vehicles ...
 - Will there be enough outside parking available to accommodate another 46 potential vehicles ?
 - And that doesn't account for any visiting vehicles, delivery vehicles, service vehicles, and the allowance for dedicated fire lanes.

11.9 INDISCRIMINATE PARKING

If there were not enough parking spaces provided for all vehicles associated with tenants of the apartment development, through a combination of underground and above-ground parking spaces, where would those 'excess vehicles' end up parking? On Main Street?

Also, if there aren't sufficient parking spaces to accommodate **visitors** to residents in such a high-density building, where will those visitors park? On Main Street?

And what about delivery vehicles, moving vans, service vehicles? This is especially important when one considers a mandatory Fire Lane.

This issue has been labelled "indiscriminate parking" in other areas (such as Moncton) where this matter has been successfully raised as an argument to prevent such large-scale high-density apartment buildings in otherwise low-density residential areas.

11.10.. FUTURE PARKING CONSIDERATIONS

- May not be allowed to park certain models of electric vehicles in enclosed parking spaces, because of spontaneous fire hazard ...
 - o Therefore will there be sufficient outdoor parking to accommodate?
- Also need to plan for the future, when even more tenants might have more than one vehicle per unit, or a vehicle and an accessory motorcycle, or ATV, or trailer, etc.
 - o Therefore need to plan for sufficient EXTRA parking for those future contingencies, rather than just meeting the bare minimum requirements for 'now'.

11.11 SNOW REMOVAL

- Where will excessive snow be deposited?
From the Roadway , Parking areas, Walkways ...

11.12 QUESTIONS REGARDING NON-COMPLIANCE

From the information provided, there are **4 issues regarding non-compliance** with the R3 zone requirements, but the developer has applied for a **text amendment for only 1 of those issues**.

1. **R3 zone has a limit of maximum building height of 50'**. The proposed building would be considerably taller than that. The developer has **applied for a text amendment to increase that maximum height to 65'**.
2. **R3 zone stipulates minimum 100' of frontage onto the street**, but the drawing provided with the notice for the public hearing **appears to show about 70 - 75' of frontage** – which **would not comply with the zone requirement**. No mention has been made of that.
3. **R3 zone requires 20' side yard setback**. From the plans which accompanied the application for subdivision, the building would be only about 30' narrower than the width of the property, which would mean about **15' of setback on either side**. That would **not comply** with the zone requirement. That has not been mentioned.
4. **R3 zone requires a peaked roof**. The drawing which accompanied the application shows a **flat roof with a wide sloped fascia, but that is not a peaked roof**. Therefore it appears it would **not comply** with the zone requirement.
It was stated that the roof 'complies', but **the drawing provided would indicate otherwise**. In addition, adding a proper peaked roof to the proposed building could cause the full height of the building to exceed even the 65' maximum - as mentioned in item 1 above.

12 RELATED INFORMATION

12.1 ECONOMIC FEASIBILITY QUESTION

- Mr Lafford said the proposed building at 131 Main would not be ECONOMICALLY FEASIBLE to build unless it was 6 stories.
- BUT - the Birch Meadows development they're currently building in Moncton is just 4 stories ...
- SO - does it make sense that the development in Moncton is economically feasible, while the proposed development in Sackville would not be?

12.2 FIRE HYDRANT INSTALLATION

- A **new fire hydrant** was installed on the property at 131 Main St, in 2022, along with extended water lines leading toward the back of the property.
 - o Location of new fire hydrant

- Since there is **also a stand-pipe** on the side of the existing building, which was installed at the same time, and there is a **hydrant on Main St not too far away** (on the corner of the neighbouring property), it doesn't appear that this new hydrant would be needed for the existing building on the property - locally known as the "Fisher house".
 - o Location of stand pipe on exterior of building

Questions:

- o Was the new hydrant installed by the property owner, or by the Town?
- o If it was done by the Town:
 - Who authorized it?
Who paid for it?
 - Is it usual to install a hydrant on private property?
 - Will the town be responsible for plowing that private driveway to maintain access to the hydrant in winter?
 - Was there an easement granted for installing the hydrant and water line to service it?



Figure 10 – location of new fire hydrant and stand pipe installed at 131 Main St, in 2022.

13. HOUSING SHORTAGE

13.1 THE UNIVERSITY EFFECT

While municipalities across the country are experiencing a shortage of housing in general, here in Sackville / Tantramar we have something that sets us apart from most other locations - we are a University town.

When there is a **shortage of university residence rooms**, students spill over into the community, renting apartments and rooms wherever they can find them, mostly within the downtown core.

Therefore, our **current perceived shortage of rental units in the downtown core** could be due in part to the **current temporary full closure of one of the major Mt A residences – Harper Hall** - for extensive renovations.

13.2 CURRENT RENTAL NUMBERS

In terms of numbers alone, there are **already a multitude of rental units** in town. Lafford Realty alone lists **14 rental buildings and complexes on their website**, with each building or complex including anywhere **from 10 to 34 units**, with a mixture of studio apartments, 1-bedroom, 2-bedroom, 3-bedroom units, and a few units with 4 or more bedrooms. They also recently acquired 2 more apartment developments, on King Street and Fawcett Ave.

That number also doesn't include **other developers and property owners in town who have multiple rental units** as well.

13.3 THE 'RENOVICTION' EFFECT

Then there are the **apartment buildings which were purchased by an outside interest** over the past year or so, with the **existing tenants being 'renovicted'** so their family-sized apartments could be redesigned to attract more students, with **each unit being rented 'by the room'**.

In short, **families have been displaced to make way for more student rentals, with the sole purpose of increasing profits for the owners and shareholders.**

13.4 RENTAL FUTURE

With university enrolment not showing any significant growth over the past 5 years or so, and with the distinct possibility that more education in the future will be delivered remotely, those apartment conversions could prove to be very short-sighted, if student numbers were to dwindle further.

When / if that were to happen, there could be a 'glut' of apartment units once again available for families to rent.

13.5 AFFORDABLE FAMILY RENTALS NEEDED

What is really lacking is rental properties suitable for families, especially families who might be struggling to make ends meet.

The so-called '**affordable units**' mentioned **for the current proposed development** are just the **smallest 1-bedroom units**. Those would be suitable for a **young working single**, or **perhaps a young couple**, but they're **not designed for families**. No family is going to fit into a small 1-bedroom apartment such as what is being offered in this proposal, **even if it were 'affordable'** for them. It's just not realistic.

13.6 WHAT DO WE REALLY NEED?

In the most recent building constructed in 2018 by Laffords, the rent for a 2-bedroom unit has risen from \$1700 to \$2100 (as currently listed on their website) – an increase of 23.5% in 4 years. This level of monthly rents is out of reach for many individuals and families, and we frequently hear of people leaving town and seeking housing elsewhere because there is nothing they can afford available here in town.

What seems to be missing is truly affordable housing suitable for families with more modest incomes.

Municipal planning needs to be based on actual **facts and figures**, and be **cognizant of the long-term** picture, and **not just react in a knee-jerk manner** to a perceived situation, or to **arbitrarily approve whatever a developer suggests**, regardless of whether or not it really fits the long-term needs of our town.

In short, while we **recognize that more housing is needed**, in particular more **affordable housing for families**, we **don't agree with "any housing, anywhere"** as a solution to the overall problem.

Perhaps Tantramar needs to create its own **Housing Committee** ... or at least conduct a **Housing Study** and **Inventory of existing rental units** in town. That could identify what is actually needed ...

- More higher-end apartments?
- More high-density apartment buildings?
- More affordable housing of all types for families?
- More seniors' apartments?
- More student housing?
- More seniors' garden homes?
- More single unit dwellings?
- More duplex dwellings?
- More rental units which allow pets?
- More 'rent-to-own' options?

13.7 ALTERNATIVE OPTION IDEAS

The current proposal by Mr Lafford simply does not fit into the space where he wants to put it, though it might be suitable in another location. There are always other options, it's just a matter of identifying them.

Here are **just a couple thoughts** on this, offered as potential examples ...

Mr Lafford has other properties in town, at least some of which are already zoned R3, on which he could probably construct another apartment building, where it would not be in such stark contrast to the surrounding heritage properties.

There are also **other properties, owned by other developers** and individuals, which could support more multi-unit residential developments, and some of those are already zoned R3.

More 'Garden Homes' would be a good option for our town, such as those which Mr Lafford constructed several years ago on Waterfowl Lane and King Street, as well as others built by various developers in numerous parts of town.

The **Lafford Realty website** is also **already advertising another new garden home development here in Tantramar**, called "**Tamarack Estates**", which their website says is **planned to open in 2024**.

<https://laffordrealty.com/tamarack-Estates/>

14. CLOSING NOTES

14.1 OTHER IMPORTANT CONSIDERATIONS

Important to **look ahead**, as well as behind ...

To make plans appropriate for 'now', while respecting our **heritage**, and will still be appropriate for '50 years into the **future**'.

Important to **investigate** all aspects of a proposed undertaking, and not accept anything at 'face value'.

All information needs to be questioned to determine whether it is the full story.

Important to **examine** this particular proposed development from every possible aspect, to determine whether it is in the best interest of the whole town, since whatever is decided for 131 Main Street will also affect all other R3 zoned properties in town.

14.2 SUMMARY OF MAIN ISSUES PRESENTED

1.. TAX INCENTIVE REBATE GRANT PROCESS

Request that Council review the actual grant information from Moncton and Riverview, compare the information with what Council was told in 2020, and consider amending the policy so it lines up with the stated goal at that time, which was to be more in line with Moncton and Riverview.

2.. HERITAGE ISSUE RELATED TO THE CURRENT PROPOSAL:

Request that Council consider placing a Moratorium on further development in any Heritage / Historical area until a new form of Heritage protection is developed and put into place.

3. PUBLIC SAFETY / TRAFFIC CONGESTION ISSUE

Request that Council consider doing a thorough traffic study of the Academy Stretch area, before any rezoning decision is made for the property at 131 Main Street.

4. DEVELOPMENT NON-COMPLIANCE CONCERNS

Request that Council review these compliance points with the Regional Service Commission, and obtain more information regarding accurate dimensions of the proposed development.

5. HOUSING SHORTAGE ISSUE

Request that Council consider initiating a Housing Study, including an inventory of current rental housing, to determine what is actually currently required by our citizens. This would also provide a good guide for future decisions about construction proposals submitted by developers.

6. BYLAW JURISDICTION ISSUE

Request that Council maintain jurisdiction over deciding what the zoning bylaw requirements should be, rather than allow a developer to have such strong influence in the decision-making process.

7. CLIMATE LENS

Request that Council apply the Climate Lens to this proposed development, as it has been adopted to apply to all aspects of town management and governance.

Thank you for your time and consideration in reviewing these points.

As always ...

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