
TO: GENERAL COMMITTEE

SUBJECT: TEMPORARY USE ZONING BY-LAW FOR 164 INNISFIL STREET
(1911940 ONTARIO INC. – LIQUIDATION NATION)

WARD: WARD 2

PREPARED BY AND KEY CONTACT: T. WIERZBA, PLANNER, EXT. 4403

SUBMITTED BY: A. BOURRIE, RPP, DIRECTOR OF PLANNING AND BUILDING SERVICES, EXT. 4485

GENERAL MANAGER APPROVAL: A. BOURRIE, RPP, ACTING GENERAL MANAGER OF INFRASTRUCTURE AND GROWTH MANAGEMENT, EXT. 4485

CHIEF ADMINISTRATIVE OFFICER APPROVAL: M. PROWSE, CHIEF ADMINISTRATIVE OFFICER

RECOMMENDED MOTION

1. That the Temporary Use Zoning By-law application, submitted by MHBC Planning on behalf of 1911940 Ontario Inc. for lands municipally known as 164 Innisfil Street, to permit a retail store on the subject lands be approved for one (1) year and six (6) months from the date of passing the Temporary Use Zoning By-law.
2. That the written and oral submissions received as part of the Public Meeting held on February 25, 2019, relating to this application have been, on balance, taken into consideration as part of the deliberations and final decision related to approval of the application for the Temporary Use By-law, including parking and traffic concerns.
3. That in accordance with Section 34(17) of the *Planning Act*, no further public notification is required.

PURPOSE & BACKGROUND

Report Overview

4. The purpose of this report is to recommend approval of a Temporary Use Zoning By-Law for the subject lands, being municipally known as 164 Innisfil Street (see Figure 1 on page three), for one year and six months. If approved, the proposed Temporary Use By-Law will permit a retail store not related or ancillary to an industrial operation, which would otherwise not be permitted on the subject lands, and would allow the retail store to continue to operate within existing site conditions, including reduced parking.
5. The retail store is currently operating on the site and has a long history of outstanding zoning compliance matters. To address these zoning matters Planning Staff worked with the applicant to explore a number of solutions. The applicant has proposed the Temporary Use By-Law as an interim solution while the City undertakes a Lands Needs Assessment ('LNA') – which is needed as part of a Municipal Comprehensive Review (MCR) and the development of a new Official Plan (OP) – and the Provincial government finalizes modifications to the Growth Plan for the Greater Golden Horseshoe ('Growth Plan'), which may expand for additional retail opportunities in employment areas.

6. An application to amend the OP and Zoning By-Law in order to permit a retail store not related to an industrial use is not ideal at this time given the OP work underway and the potential of the Province making substantial changes to the Growth Plan.
7. The Temporary Use Zoning By-Law application must proceed to address the immediate zoning compliance issue.
8. While the applicant is seeking approval of the proposed Temporary Use By-Law for three years, as permitted by the *Planning Act*, Planning Staff are of the opinion that the approval of the Temporary Use Zoning By-Law for one year and six months is appropriate. This timeframe is sufficient for the aforementioned LNA to conclude. The LNA will conclusively determine the City's ability to accommodate forecast industrial employment growth over the long term, and will allow Planning Staff to address the retail use through a comprehensive process.
9. If the results of the LNA conclude that there is sufficient employment lands to accommodate the forecast employment growth as identified in the Growth Plan, the applicant will be permitted to file planning applications to consider the redesignation of the property to allow a dedicated retail store on the subject lands.
10. Should the results of the LNA demonstrate that there is insufficient employment lands to accommodate the employment forecasts, and applicant cannot demonstrate, through the OP process, that the retail use can continue on the subject lands with no negative impact in the City's ability to accommodate industrial employment over the long term, the Temporary Use Zoning By-Law will expire and the applicant will be required to relocate the retail use to appropriately designated and zoned lands.

Site and Location

11. As illustrated in Figure 1 (on next page) the subject lands are surrounded by the following uses:
 - a) North: A self-storage operation on lands zoned General Industrial.
 - b) South: The subject lands are adjacent to Brock Street. Uses on the opposite side of Brock Street include residential, general industrial, and commercial.
 - c) East: The subject lands have an east-ward orientation and front onto Innisfil Street. Brock Park is located on the east side of Innisfil Street.
 - d) West: Vacant land zoned General Industrial (GI).
12. The existing industrial building on the property is occupied by multiple uses. The retail store, which is to be recognized and permitted by the proposed Temporary Use Zoning By-Law, is not related or ancillary to any existing industrial uses on the property. Rather, it is a distinct retail operation.
13. The proposed Temporary Use By-Law would apply to a portion of the property, identified as 'Subject Area' in Appendix "A", which occupies approximately 3,213m² on the western portion of the existing industrial building. The applicant is not proposing to alter the site or the existing building.
14. The subject lands are designated General Industrial in the City of Barrie Official Plan (OP) and zoned General Industrial (GI) in the Comprehensive Zoning By-law 2009-141 (see Figure 1). The subject lands are approximately 2.9 hectares in size.

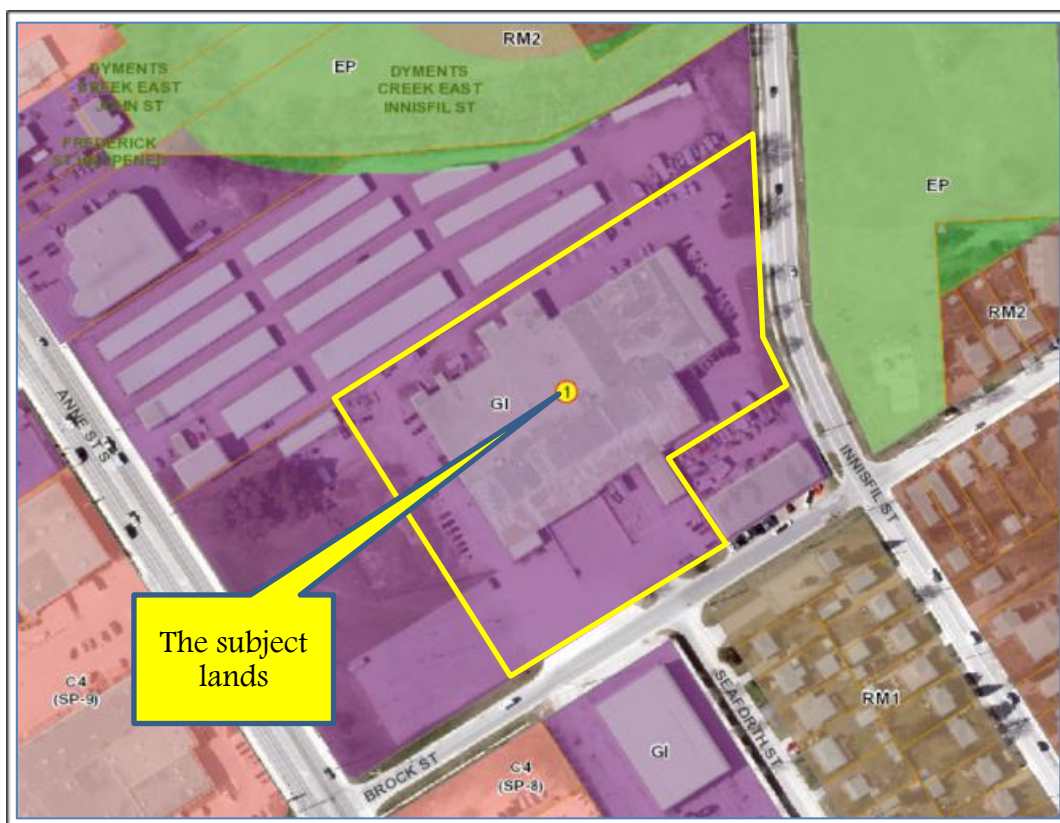


Figure 1 (above): A key map identifying the location of the subject lands (outlined in yellow).

Existing Policy

15. As per Section 39 of the *Planning Act*, R.S.O. 1990 ('*Planning Act*') a municipality may pass a Temporary Use By-Law to authorize the temporary use of land, buildings or structures for any purpose that is otherwise prohibited for a period of up to three years.
16. Being designated General Industrial, the lands are subject to the General Industrial policies of the OP. OP Policy 4.4.2.1. states "commercial uses such as retail stores not directly related to the function of industrial areas, or which are more appropriate in designated commercial areas, are not permitted" on lands designated for industrial uses. Further, OP Policy 4.4.2.2.b) states that retail uses "...may also be permitted [on lands designated General Industrial] as long as they are ancillary or accessory to the primary [industrial] use...". Further, Section 7.2.2 of Comprehensive Zoning By-law 2009-141 ('*Zoning By-Law*') permits accessory retail uses to locate on lands zoned GI. However, accessory retail uses shall only be permitted in association with permitted industrial uses and are limited in size. The retail use being recognized by the proposed Temporary Use Zoning By-Law is not associated with or ancillary to industrial uses on the subject lands and exceeds the size permitted for a retail use. Despite these policies Planning Staff recognize the retail store has been established. The proposed Temporary Use By-Law will give Planning Staff time to work with the applicant to develop a permanent solution regarding the conflict between the existing retail store and the in-effect land-use policy.
17. The approval of the proposed Temporary Use By-Law would allow retail use to continue for a period of one and a half years and recognize existing site conditions.

Supporting Information

18. To support the application the applicant has submitted Planning Justification Report (PRJ) and a Site Sketch (see Appendix "A").
19. The PRJ supports the application by:
 - a) Outlining how the proposed Temporary Use is consistent with the Provincial Policy Statement (PPS) as it supports efficient use of existing building stock, provides employment, and does not constitute an employment land conversion;
 - b) Detailing how the application conforms or does not conflict with the Growth Plan as it promotes economic development and makes efficient use of underutilized employment lands, and;
 - c) Demonstrating that the application satisfies the temporary use policies of the City's OP by having no or minimal impact on surrounding area, being positive in nature as it generates jobs, providing for adaptive reuse of underutilized industrial building, and satisfying the temporary use criteria in Section 6.9.2.c) of the OP.

Public Engagement

20. A Public meeting was held on February 25th, 2019. No oral comments or submissions were made at the Public Meeting.
21. Two written submissions were received:
 - a) A resident expressed concern about parking and traffic issues as well as garbage on the street due to overflow or collection. Planning Staff advised the resident that the application is to permit the continued operation of a retail store known as Liquidation Nation, and that no other retail uses were being proposed. The resident had no other concerns.
 - b) Enbridge Gas – indicated they had no concerns with the proposal.

Department & Agency Comments

22. Building Services comments:

Comments received note that the applicant applied for a change of use in 2010. This change was not approved and the building permit was placed on hold. Nonetheless the applicant proceeded to change the use from industrial to retail. Building services staff opened complaint investigations due to the retail tenancy and further expansion of the building without a permit in 2016. Building services request that a condition be imposed to require the building to undergo a change of use inspection(s) to ensure minimum life safety requirements have been met for a retail use and to ensure compliance with the Ontario Building Code (OBC).

Planning staff agree with these comments, particularly with the need for the building to be inspected to ensure life safety standards are met and the building complies with the OBC. Planning Staff will work with the applicant to ensure OBC matters on the property are addressed. The expectation is that the applicant satisfy or resolve building and fire code related matters immediately given that a building permit was not issued for the change of use or building alterations. Planning Staff understand that the applicant has been in contact with the Building Department to begin addressing these matters. Although Planning Staff are recommending approval of the proposed Temporary Use Zoning By-Law, the outstanding life safety issues must be resolved immediately or enforced in order for the use to continue in the short term without jeopardizing public safety. Staff are exploring all options, including a requirement for the applicant to remedy outstanding matters through an application for Exemption from Full Site Plan approval, to ensure life safety matters are addressed. The applicant has been advised to address the outstanding OBC matters as soon as practically possible or the City will explore enforcement options.

23. Fire Prevention:

The City's Fire Preventions officer cannot support the application as alterations to the building have been completed outside the building permit process.

Planning staff concur with comments from the fire prevention officer. Similar to concerns regarding the OBC, the building must be inspected and minimum fire safety standards must be met as soon as practically possible, otherwise the City will explore enforcement options.

24. Development Services/Engineering Department:

No concerns or comments.

25. Traffic and Parking Services:

Traffic and Parking Services Staff would like the access to be formalized and have identified additional opportunities for parking which they would like to see added on the site. Lastly, the applicant is being asked to look into the feasibility of using the neighbouring property for additional parking.

As the continued operation of the retail use on the subject lands is uncertain and temporary, Planning Staff do not recommend the applicant be required to make any permanent improvements to the site. Rather, Planning Staff will work with the applicant to implement temporary modifications to the site (e.g. line painting, movable concrete bollards, and improved signage) through the aforementioned Exemption from Full Site Plan process. These modifications, while temporary, will improve operations on the site on an interim basis. Should the retail use be permitted on a permanent basis, the applicant will be required to proceed through Full Site Plan Approval to ensure all matters are addressed.

26. Zoning standard compliance:

Comments received regarding standard compliance have identified deficiencies in the side and rear yard setbacks, and parking. Further, parking needs to be paved and curbed, that lands abutting the road must be paved for parking and for loading spaces.

Planning Staff are of the opinion that while these deficiencies need to be rectified, doing so would only be appropriate should the use becomes permanent. Requiring the applicant to address these issues, many of which are resulting from existing site conditions and not new development, prior to the use being permitted could suggest that the ultimate land use is pre-determined. Staff will work with the applicant, through the aforementioned Exemption from Full Site Plan Approval process, to address parking deficiencies noted above on a temporary/interim basis.

27. Invest Barrie:

Comments from Invest Barrie Staff indicate that while the retail use is unique, the loss of a 34,000 square feet industrial facility to a retail use is unfortunate for the City as several industrial operations could have leased the space over the period of time that the building has been occupied by Liquidation Nation. Further, Invest Barrie Staff are concerned about several other retail uses operating out of industrial buildings in the area.

As indicated throughout this report, Planning Staff are concerned about the continued operation of a dedicated retail use on lands designated for industrial uses. The comments provided by Invest Barrie Staff echo these concerns.

ANALYSIS

28. This sub-section provides a detailed review of the proposed Temporary Use Zoning By-Law in the context of the applicable land-use policy.

The Planning Act

29. Section 39 of the *Planning Act* allows municipalities to pass Temporary Use By-Laws which may permit uses that are otherwise prohibited. Temporary Use By-Laws may be permitted for up to three years and may be extended upon Council's discretion. The *Planning Act* does not provide additional direction on what grounds Temporary Use By-Laws may be passed.

Provincial Policy Statement

30. There are two key policies in the PPS which must be considered. They are policies 1.3.2.1 & 1.3.2.2, which state:

“Planning authorities shall plan for, protect and preserve *employment areas* for current and future uses and ensure that the necessary *infrastructure* is provided to support current and projected needs.” – PPS policy 1.3.2.1

“Planning authorities may permit conversion of lands within *employment areas* to non-employment uses through a *comprehensive review*, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion.” – PPS policy 1.3.2.2

31. Taken together, these two policies indicate that planning for employment is to be a comprehensive process, one which takes into consideration current and future uses, as well as the demand for and supply of land within employment areas.
32. The City is currently undertaking a LNA as part of the new OP process. This process will provide Planning Staff with information on how much land is needed within employment areas to meet current and future demand, and will allow the City to plan for employment in a comprehensive manner as per the PPS policies referenced above.

Growth Plan for the Greater Golden Horseshoe 2017 ('Growth Plan')

33. To ensure planning for residential and employment is done in a consistent and comprehensive manner the Province implemented a LNA Methodology for the Growth Plan. Municipalities within the Greater Golden Horseshoe must, as part of an MCR, use the LNA Methodology to determine if there is enough designated residential and employment land to accommodate future growth as per Schedules 3 & 7 of the Growth Plan. The LNA Methodology therefore provides municipalities with direction on how to differentiate, plan for, and accommodate different types of employment. The LNA Methodology is to be used as part of an MCR and not specifically for when considering a Temporary Use Zoning By-Law. However, the approach prescribed in the LNA Methodology will inform the employment policies and land-use designations of the City's new OP, which is currently in development. In this context it would be inappropriate to overlook the direction provided by the LNA Methodology when considering the proposed Temporary Use Zoning By-Law.
34. The LNA Methodology separates employment uses into four broad categories, as defined below:
- **Population-related employment:** Jobs that primarily serve a resident population, including retail, education, health care, local government and work-at-home employment. The vast majority is located in community areas.
 - **Major office employment:** Office jobs contained within free-standing buildings more than 20,000 net square feet (1,858 m²), as this is the size threshold that is used for most relevant datasets. This differs from the 4,000 m² size threshold that is used in Growth

Plan policy for determining the size of buildings that must be located near existing or planned *frequent transit*.

- **Employment land employment:** Jobs accommodated primarily in industrial-type buildings. The vast majority are located within business parks and industrial areas (i.e. *employment areas*) within *settlement areas*. In older urban centres, some share of this type of employment also occurs in more dispersed locations. There are also some jobs in this category on lands outside *settlement areas* with existing permissions.
- **Rural-based employment:** Jobs scattered throughout *rural lands* and include agriculture and primary industries as well as other uses that might typically be found in existing *employment areas* located outside of *settlement areas* on rural lands. Uses will typically include *agriculture-related uses* such as feed or fertilizer facilities, small-scale manufacturing or construction businesses run from rural and farm properties and some scattered retail or service users.

(Ministry of Municipal Affairs LNA, 2017: 72-73)

35. As per the definitions above retail stores such as Liquidation Nation are *population-related employment*. Industrial type uses such as manufacturing or warehousing are *employment land employment*.
36. The LNA Methodology directs municipalities to plan for and accommodate the majority of *employment land employment* in employment areas, whereas *population-related employment* is to be directed towards *community area lands*, which are defined as:
- “Areas where the vast majority of housing required to accommodate forecasted population will be located, as well as the majority of population-related jobs, most office jobs and some employment land employment jobs.” (LNA, 2018: page 14)
37. It is understood that some *population-related employment* will be accommodated on employment area lands so that they can to support *employment land employment* uses. *Population-related employment* uses that do not support or are not related to *employment land employment* are to be accommodated on community area lands.
38. To provide further clarification regarding the appropriate location of *population-related employment* the LNA Methodology states that “[when] delineating an *employment area* adjacent to a commercial/retail area, any non-associated or non-ancillary retail activity should not be included in the *employment area*” (LNA Methodology, 2018: Pg. 17).
39. Liquidation Nation is a *population-related employment* use that does not support employment land employment. It is unclear what effect the continued operation of a population-related retail store on lands designated for *employment land employment* will have on the City’s ability to accommodate growth in the industrial sector over the long term.
40. The continued operation of a population-related retail store use in an employment area planned to accommodate industrial or *employment land employment* goes against the land-use planning principles of the Growth Plan and contradicts the employment planning practices prescribed by the Province’s LNA Methodology.
41. Planning Staff contend that the City’s LNA, which is currently underway, is the only appropriate tool through which to determine if the *population-related employment* use, being Liquidation Nation, can

continue on the subject lands without having a negative impact on the City's ability to accommodate *employment land employment* over the long term. As the LNA results will be available shortly, there is no need for the proposed Temporary Use By-Law to receive a three year approval as per the *Planning Act*. Rather, the 1.5 years recommended in this report will be sufficient for staff to work with the applicant to implement a permanent solution.

42. In addition to the LNA the Growth Plan also provides policies which speak to the protection of employment areas for the long term. Specifically, Growth Plan policy 2.2.5.6 states:

“...single-tier municipalities...will designate all *employment areas*, including any *prime employment areas*, in official plans and protect them for appropriate employment uses over the long-term.”

The subject lands, as illustrated in Figure 1, are within an area clearly designated for industrial type employment. Although not yet designated as such these lands form part of an employment area. Through the OP the City has established that industrial employment, and ancillary/related retail, are the appropriate uses on lands within this employment area. As per Growth Plan policy 2.2.5.6 above these lands are to be protected for the appropriate employment uses over the long term. Therefore the proposed Temporary Use Zoning By-Law should only be permitted on the subject lands until the LNA is complete and the appropriate employment use on the subject lands is established.

43. There is also the matter of the Provincial government's proposed amendment to the Growth Plan. Among other things the proposed amendment may remove or reduce restrictions regarding *population-related employment* in employment areas as well as removing or reducing land within employment areas. The Province is currently finalizing the proposed Growth Plan amendment. The proposed Temporary Use Zoning By-Law and recommended timeframe is an appropriate mechanism through which to temporarily permit the retail store as it will provide time for Planning Staff to work with the applicant to determine if the use can be formalized through the OP process, if it needs to be relocated, or if it can be addressed through a new process yet to be detailed in the proposed Growth Plan amendment.

City of Barrie Official Plan

44. The OP provides general growth management policies to guide population and employment growth throughout the City.
45. Similar to the PPS and the Growth Plan, the OP is supported by growth management goals which address the City's need to:
- a) “...accommodate projected needs for residential, employment, and other lands...”
(OP policy 3.1.1.a)
 - b) “...strengthen the City's role as the areas' principle employment centre...”, and,
(OP policy 3.1.1.b)
 - c) “...to match the supply of lands...with the needs of residents and employers...in accordance to the City's population, [and] employment, intensification and density targets”.
(OP policy 3.1.1.d).
46. The subject lands are designated General Industrial in *Schedule A-Land Use* to the City's OP. Therefore the Industrial and General Industrial policies of the OP apply. The OP states that “commercial uses such as retail stores not directly tied to the function of industrial areas, or which are more appropriate in designated commercial areas are not permitted” (OP policy 4.4.2.1.c). This

- policy clearly states that dedicated retail uses, such as the use which is to be recognized through the proposed Temporary Use Zoning By-Law, are not permitted on the subject lands.
47. Planning for residential and employment uses must be done in relation to the City's population and employment needs as well as intensification and density targets. It is unclear how the continued occupation of industrial employment lands by a *population-related employment* use will impact the City's ability to achieve the goals of the OP; namely, the City's ability to attract and accommodate *employment land employment*. Permitting the retail store to continue to operate on the subject lands for a period of 1.5 years, providing the applicant with time to either participate in the OP process or relocate to lands that are appropriate for the use, is an appropriate course of action.
 48. The General Industrial policies of the OP state that "the predominant land use [on lands designated general industrial] shall be manufacturing, processing, servicing, storage of goods and raw materials, industrial warehousing and similar such uses" (OP policy 4.4.2.2.a)). Further, retail uses "...may also be permitted as long as they are ancillary to accessory to the primary use..." (OP policy 4.4.2.2.b). The proposed use is a retail store which has no relationship to the industrial operation on the property or the employment area, nor does it offer a service or support to the employment area.
 49. The policies referenced above do not support the establishment of a retail store that is not ancillary or related to industrial uses within an employment area. These policies form a component of the City's land-use planning framework. The continued operation of the retail store without support from a comprehensive analysis like the LNA undermines this policy framework.
 50. Section 6.9 of the OP speaks specifically to temporary uses and provides direction on how to address and accommodate temporary uses.
 51. Policy 6.9.1 of the OP states that a temporary use shall be authorized "where it is considered to be positive in nature and of minimal impact to the surrounding area". The short and long term impacts of the retail store in an industrial employment area are unclear. As such staff cannot confirm that the temporary use is positive in nature. However, the use has been on the subject lands for over eight years and, according to the applicant, has done so with no operational issues.
 52. Section 6.9.2 of the OP indicates that despite any other policies referenced in the OP, including those referenced above, the City may permit uses which would otherwise be prohibited.
 53. Section 6.9.2.c) of the OP outlines criteria which, if applicable, a temporary use application is to fulfil to be approved. These criteria speak to:
 - a) The use being temporary in nature;
 - b) Compatible and not detrimental to surrounding uses and the wider community;
 - c) On lands or in a building of appropriate size;
 - d) That municipal services are available;
 - e) Neighbouring uses are buffered or protected from the proposed use, and;
 - f) That the By-Law establish site specific performance standards such as lot coverage or parking, as applicable.
 54. The site and building being used for the retail store is not ideal, and may not meet all the criteria outlined in section 6.9 of the OP. Nonetheless, any works needed to meet the criteria outlined

above – excluding OBC and fire safety standards discussed earlier – should only be required if the applicable land-use policies are amended to permit population-related retail stores on the subject lands.

Next Steps

55. To ensure the City can plan for employment in a comprehensive manner, as prescribed in the PPS, the Growth Plan, and the LNA, it is recommended that the proposed Temporary Use Zoning By-Law be approved for a time period of one (1) year and six (6) months. This will tie the approval of the Temporary Use Zoning By-Law with the LNA, the results of which will be available this year. The results of the LNA will provide direction regarding the City's need for employment land following a comprehensive supply and demand analysis. Should the LNA results indicate there is sufficient employment land, the applicant will be able to participate in the OP process to amend the applicable policies to permit *population-related employment* on the subject lands. Conversely, should the LNA results indicate there is insufficient employment land, the applicant may be required to relocate the retail operation to lands designated for *population-related employment*. Both scenarios give the applicant over a year to either justify the redesignation of the subject lands through the OP process or find lands designated for dedicated retail uses. This process and timeline will ensure that the use is indeed temporary and tied to a time-bound resolution.
56. The process described above will also ensure that planning for employment in Barrie is comprehensive and ensures that the City does not jeopardize its ability to attract and accommodate future industrial sector employment.

ENVIRONMENTAL MATTERS

57. There are no environmental matters related to the recommendation.

ALTERNATIVES

58. The following alternatives are available for consideration by General Committee:

Alternative #1

General Committee could alter the proposed recommendation by extending the approval of the Temporary Use Zoning By-Law to the full three (3) years, as permitted by the Planning Act.

This alternative is not recommended as Planning Staff cannot confirm what impact the continued occupation of industrial employment land by a retail store will have on the City's ability to attract and retain industrial employment. In addition, the LNA is to be completed within five months, and will provide direction as to the City's employment land need over the long term.

Alternative #2

General Committee could refuse the approval of the proposed Temporary Use Zoning By-Law.

This alternative is not recommended. The use is existing and has existed for many years. Refusing this Temporary Use Zoning By-Law would result in a closure of a business and will abruptly put people out of work, causing financial hardship to employees and the business owner. In addition, the recommended course of action part of a comprehensive, time bound, and reasonable strategy to resolve the zoning compliance matter.

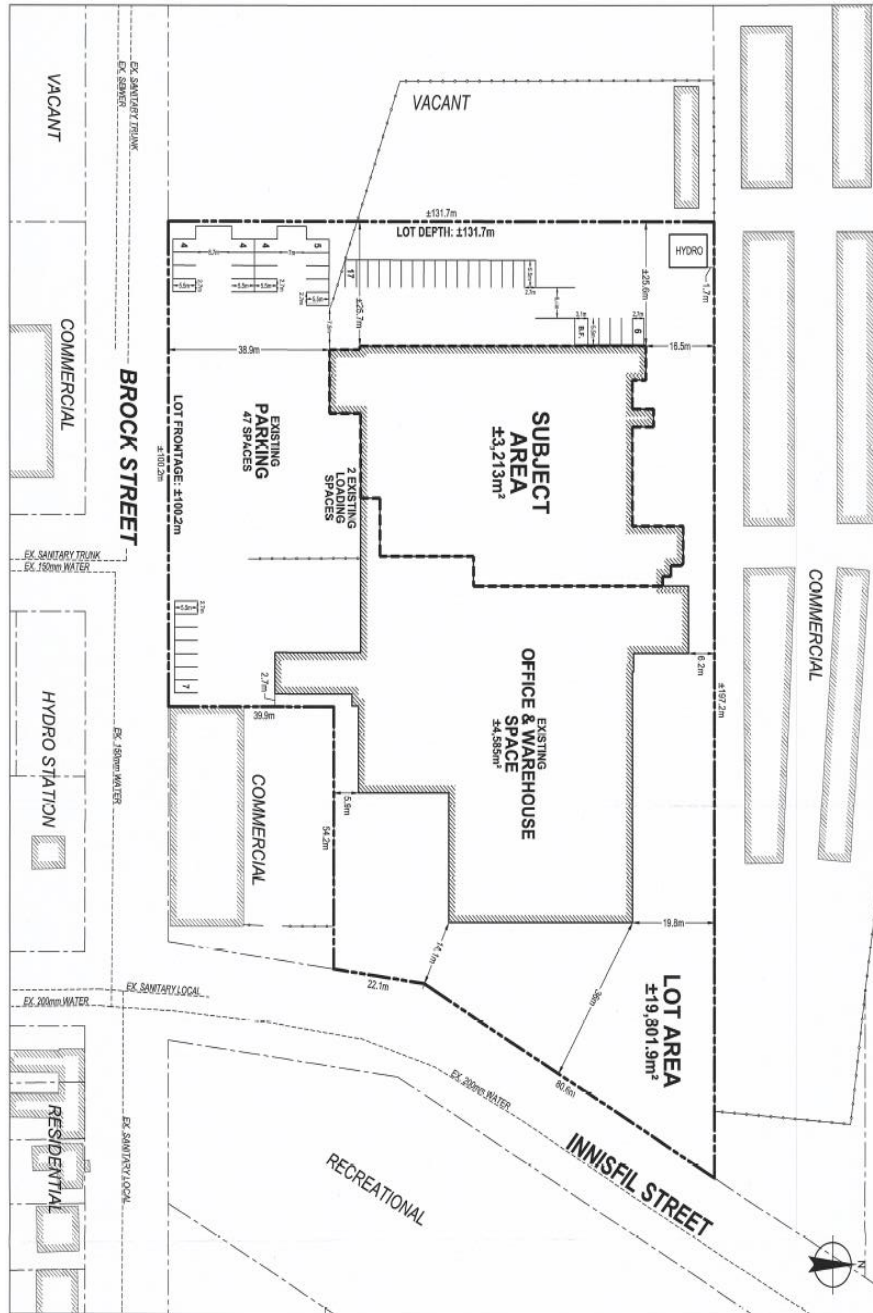
FINANCIAL

59. There are no direct financial implications for the Corporation resulting from the proposed recommendation.
60. The applicant has the right to appeal Council's decision under the *Planning Act*. While an appeal is not anticipated, the City would incur costs to resolve the matter through the *Local Planning Appeal Tribunal* (LPAT).

LINKAGE TO 2018-2022 STRATEGIC PLAN

61. The recommendation(s) included in this Staff Report support the following goals identified in the 2018 - 2022 Strategic Plan:
- ☒ Growing Our Economy:
The Proposed Temporary Use By-Law will allow the continued operation of a retail store until a permanent land use solution is available.

APPENDIX "A"
Existing Site Sketch



EXISTING SITE SKETCH
Liquidation Nation
164 Innisfil Street
City of Barrie
County of Simcoe

LEGEND
--- Subject Area
--- Property Boundary
--- Building
--- Fence

GENERAL INDUSTRIAL (GI) ZONE

PROVISION	REQUIREMENT
Lot Area (min.)	7500m²
Lot Frontage (min.)	150m
Front Yard (min.)	7m
Side Yard (min.)	3m
Rear Yard (min.)	7m
Lot Coverage (max.)	50%
Parking Spaces (1 Space/1000sqm)	2 Spaces
Loading Spaces	2 Spaces

November 6, 2018

Plan of Survey (Building & Site) Surveyed: April 14, 2018

Scale: 0 4 8 12 16 20
Metres

N. 100° 00' 00" E. 100.00m
M. 100° 00' 00" E. 100.00m
P. 100° 00' 00" E. 100.00m

**PLANNING
& LANDSCAPE
ARCHITECTURE**
MHC ARCHITECTURE