



June 27, 2013

Mathieu Fleury, Councillor
Ward 12, Rideau-Vanier
City of Ottawa
110 Laurier Ave West
Ottawa (ON) K1P 1J1

Re: Site Plan Control Lite Application for 458 Nelson Street

Dear Councillor Fleury:

Action Sandy Hill (ASH) recognizes your concerted efforts thus far on the planning and development file, in particular the Site Plan Control Lite process and the interim control by-law. However, despite these efforts, our neighbourhood still faces the unfortunate construction of numerous inappropriate conversions. These conversions have been allowed to continue despite the moratorium because their applications were completed before the interim control by-law was passed.

While we appreciate that these grandfathered applications cannot all simply be rejected, some of them warrant rejection as no reasonable person could possibly conclude that they are actually conversions, even under the City's current vague definition. In particular, your urgent action is needed on 458 Nelson Street as demolition has already begun.

As we stated in our previous correspondence concerning this property, dated April 17, 2013 (copy attached), we contend that this development does not qualify as a conversion; rather it is new construction and should have to qualify under the applicable infill guidelines. It is important to note that, since we originally commented on this development, additional information has come to light that further supports our contention that this is in fact infill. The attached memo outlines in detail the information that led us and legal counsel to this conclusion.

To summarize, the existing structure will be demolished to such an extent that staff from the City's building department have determined that it will no longer be structurally sound and will have to be rebuilt from the foundation up. The City's building department is thus holding off on issuing the permit for conversion until structural work, including rebuilding the foundation, is completed under a separate building permit. The City of Ottawa's zoning by-law states that, "*Conversion means the alteration of, but*

not demolition of a residential use building to increase the number of principal dwelling units or rooming units...". The Ontario Building Code Act states that, "demolish" means to do anything in the removal of a building or any material part thereof and "demolition" has a corresponding meaning". In this case, a significant material part of the building is being removed; therefore, the building is clearly being demolished. As the building is being demolished, and conversion cannot include demolition of a residential use building, this is obviously not a conversion.

In order to ensure that this application is presented before the planning and development committee, we ask that you exercise your prerogative and remove delegated authority from the planning department. We understand that this action may not bring about any substantive change in this particular case, though we are hopeful that it will. Regardless, it will afford the public an opportunity to be heard on the issue of conversions; and, when the planning and development committee is presented with all the facts on this project, we believe that they will be convinced not only that this project is not a conversions but also of the dire need to develop clearer guidelines for what should qualify as a conversion.

Again, thank you for your continued efforts on the planning and development file; we look forward to working together further in the future.

Best regards,



Chad Rollins
Chair, ASH Planning Committee

Cc: Mayor Jim Watson

MEMORANDUM

TO: Board of Action Sandy Hill

FROM: Eugene F. Derényi

DATE: June 24, 2013

SUBJECT: Request that Councillor Fleury withdraw delegated authority for the 458 Nelson St. conversion

Resolution of the ASH Planning Committee

At the June 18, 2013 meeting of the ASH Planning Committee, a motion was unanimously carried to urge the Board of ASH to ask Councillor Fleury to remove staff delegated authority for the site plan control approval application for 458 Nelson St.

The Board of ASH is requested to adopt and act on this recommendation of the ASH Planning Committee thus allowing a public hearing before the City Planning and Development Committee of the issues raised by the 458 Nelson conversion which have implications for Sandy Hill and other Ottawa neighbourhoods affected by conversions.

Summary

An application has been made to the City for the conversion of the dwelling at 458 Nelson St. to a four unit "Converted Dwelling" having a minimum of 15 bedrooms. The proposed conversion is extreme and undesirable for Sandy Hill and ASH has opposed it. Councillor Fleury had previously stated that he would remove staff delegated authority for the site plan control approval application for 458 Nelson St. but has since indicated that he is not prepared to do so.

If delegated authority is removed, this site plan control application will go before the City's Planning and Development Committee, and ASH, planning and building experts and members of the public will have the opportunity to make presentations to the Committee.

When converting a dwelling to a "Converted Dwelling" as defined in the Zoning By-law, demolition and rebuilding of the original dwelling is not permitted. Since very little of the original dwelling will be retained, serious concerns have been raised with the Councillor Fleury and City staff that the original dwelling will effectively be demolished and rebuilt during the course of the conversion.

City staff have responded that they have no clear guidelines for how much of the original dwelling must be retained for it to still qualify as a "Converted Dwelling". The 458 Nelson St. proposal is not the first, nor the only, and no doubt not the last, "conversion" to push the

boundary between demolition and conversion. This question has broad implications for development in Sandy Hill and other Ottawa neighbourhoods and clear guidelines are urgently needed. The City's Planning and Development Committee is the proper forum in which to establish those guidelines because it will bring the expertise of the Committee to bear and will allow for expert and public input in a public forum. By removing staff delegated authority, Councillor Fleury would enable this very important question to be put to the Committee.

This memorandum provides a summary of the history of the conversion proposal for 458 Nelson and the very important planning issues it raises for Sandy Hill and other Ottawa neighbourhoods facing similar intensification pressures.

The 458 Nelson conversion

The current dwelling at 458 Nelson St. on the block between Somerset St. East and Templeton St., is a two storey detached dwelling (see the white house in the attached photo). On April 3, 2013, an application for site plan control approval under the site plan 'lite' regime for Sandy Hill was submitted to the City Planning Department on behalf of the developer Billy Triantafilos (the "Developer"). The site plan control application seeks approval for the conversion of 458 Nelson to a "Converted Dwelling" having 4 units and a minimum of 15 bedrooms. The current dwelling will be greatly expanded with the addition of a third storey and a 3 storey addition at the back. The site plan and architectural drawings for the converted dwelling are attached.

The Developer also owns the properties at 460 and 466 Nelson St. directly to the south. In 2011, the Developer converted the dwelling at 466 Nelson St. into a four unit student "bunkhouse" with 21 bedrooms. The conversion of 458 Nelson St. will also result in a bunkhouse of similar design. In addition, the Developer prepared architectural drawings for the conversion of 460 Nelson St. into a bunkhouse which he submitted to ASH. However, a site plan control application for 460 Nelson St. was not submitted before the enactment of the Interim Control By-law and therefore the conversion of 460 Nelson St. is on hold until the Interim Control By-law is lifted.

In addition, the dwelling at 488 Nelson St., on the same block of Nelson, was converted to a four unit (20+ bedroom) student bunkhouse by another developer about a year ago. All of the bunkhouses, both built and proposed, are of the genre that Councillor Hume has characterized as "extreme conversions", where the footprint, height and massing of the buildings are taken to the maximum without regard to the character of the neighbourhood. Needless to say, if the conversions of 458 and 460 Nelson St. are permitted to proceed, this block of Nelson St. will be saturated with 4 bunkhouses, an unfair burden for any residential block to bear. The dwellings at 460 and 466 Nelson St. did not require site plan control approval because they were developed prior to the implementation of the site plan control "lite" regime for Sandy Hill in May 2012. Consequently, the 458 Nelson St. conversion presents the first opportunity for Councillor Fleury to put a conversion proposal on Nelson St. before the Planning and Development Committee.

ASH and community opposition to the 458 Nelson conversion

At the April 16th ASH Planning Committee meeting, members of the community expressed grave concerns about the conversion of 458 Nelson St. As a result, ASH provided written

comments on the site plan application to Councillor Fleury on April 17, 2013 in which it raised numerous concerns about the proposed building. ASH took the position that this conversion constitutes infill and not a conversion:

On the note of infill, we contend that this proposal constitutes actual infill as opposed to a conversion since the developer will be keeping so little of the original building that he will not be converting a home but rather demolishing it and rebuilding it on its original footprint. As a result, the zoning applicable to new construction should apply. (See attached e-mail from Sophie Beecher to Councillor Fleury).

Among the other concerns raised by ASH were that the proposed building:

- a) is too large for the lot and the immediate broader surroundings;
- b) will tower over the street;
- c) represents messy and awkward construction which the City is attempting to address through infill guidelines;
- d) will involve removal of a massive tree to make way for paving and parking;
- e) will include a rooftop patio which will significantly contribute to noise; and
- f) is so long and large that it will deprive neighbouring properties of most of the sunlight to their garden and back windows.

Councillor Fleury's Office forwarded ASH's comments to the City Planning Department. In addition, many concerned residents wrote letters to Councillor Fleury and the Mayor opposing the conversion calling for an interim control by-law to halt such conversions.

The Interim Control By-law

On April 23rd, City Council enacted an Interim Control by-law prohibiting, inter alia, "Converted Dwellings", in Sandy Hill and a number of other wards¹.

However, the Interim Control By-law "grandfathers" Converted Dwellings for which a "completed" site plan control approval application, building permit application or an application for a minor variance was received by April 23, 2013².

¹ Paragraph 2 of the Interim Control By-law sets out the types of conversions that are prohibited:

- 2. *Enact an Interim Control by-law prohibiting the use Converted Dwelling, as well as prohibiting the conversion of Detached, Linked-detached, Semi-detached and Duplex Dwellings, to a Three-unit Dwelling as these terms are defined within the City of Ottawa Zoning By-law No. 2008-250, within the areas shown on Attachments 1 and 2;*

Building permit application for 458 Nelson St.

After the enactment of the Interim Control By-law, the Developer applied to Building Services for a building permit for the conversion. Building Services takes the position that the conversion is “grandfathered” and that a building permit can be issued because a “completed” application for site plan control approval for the conversion was submitted by April 23rd. The Planning Department likewise considers the site plan control application to be grandfathered and is moving toward approving it.

Upon review of the building permit application, Building Services was “surprised” by the scope of work being proposed. The proposed construction will involve:

- a) demolition of the old foundation;
- b) excavation of a new deeper foundation;
- c) pouring of a new foundation;
- d) gutting of the entire interior;
- e) demolition of a one storey addition at the back of the dwelling;
- f) removal of the roof;
- g) removal of 1 exterior wall on the first floor and 2 exterior walls on the second floor.

All that will be left of the original dwelling will be three walls on the first floor and two walls on the second floor.

Building Services is concerned that the scope of the work proposed is so extensive that the structural integrity of the house would be lost and it would not be possible to retain any of the original walls. As a result, Building Services has not yet issued a converted dwelling permit and is requiring the developer to structurally reinforce the house first. In order to permit the structural work to proceed, Building Services issued an alteration permit on June 10, 2013 to allow the house to be raised, a new foundation poured, structural alterations made to the ground floor assembly (i.e. reinforcing of the ground floor) and then lowering of the house onto the new foundation. The old foundation will be removed and a new foundation will be poured

² Paragraph 3 of the Interim Control By-law sets out the pending conversions to which the By-law does not apply:

3. Approve that the Interim Control by-law not apply so as to prevent the issuance of a building permit for the development of a Converted Dwelling, or a Three-unit Dwelling resulting from the conversion of a Detached, Linked-detached, Semi-detached or Duplex Dwelling within the areas shown on Attachments 1 and 2, for which a completed application for a building permit, Committee of Adjustment approval or site plan control approval has been received by April 23, 2013.

which will be deeper than the original. The converted dwelling permit is being held pending completion of the structural work.

At the June 18th ASH Planning Committee meeting, Mat Genest from Councillor Fleury's office gave an update on the site plan control approval application for 458 Nelson St. He advised that while some changes have been made, such as moving the bike storage to the back of the property and moving the roof top amenity space further back from the rear of the property, the building's footprint, height and massing have not been altered. Most of ASH's concerns therefore have not been addressed.

Withdrawing delegated authority

The site plan control approval application is still pending. Once the Planning Department completes its report on the site plan control application, it will be sent to Councillor Fleury who must either concur or not concur with the recommendations of the Planning Department. If he does not concur (i.e. he withdraws delegated authority), the application goes before the City Planning and Development Committee which would allow for submissions to be made by ASH and the public.

At the April 29th monthly ASH Board meeting, Councillor Fleury unequivocally declared that he would withdraw delegated authority from the site plan applications for conversions in Sandy Hill which were still pending approval. Since then, he has back-peddled on this commitment and has stated that he is not willing to withdraw delegated authority because he believes that the City Planning and Development Committee would merely follow the recommendations of the Planning Department and approve the conversion.

To paraphrase a member of the ASH Planning Committee, we should not presuppose what the City Planning and Development Committee will decide. Furthermore, there are legitimate legal questions as to whether or not this conversion (and others like it) properly qualify as a "Converted Dwelling" under the Zoning By-law and whether the conversion is grandfathered. Since the answer to these questions will have broad implications for conversions generally in Sandy Hill and elsewhere, it would be better for them to be decided by the City Planning and Development Committee with public input rather than by City staff.

The proposed conversion does not fall under the definition of "Converted Dwelling"

The proposed development will not result in a "Converted Dwelling" within the definition because it involves de facto demolition and replacement of the original dwelling. The definition of "Converted Dwelling" in the Zoning By-law is as follows:

Converted Dwelling means a residential use building that has been altered, but not demolished and replaced, to increase the number of principal dwelling units to four or more. (une habitation/maison convertie) (By-law 2013-54) [emphasis added]

The Zoning By-law does not define "demolished". Undefined terms are to be given their normal and ordinary meaning. The work proposed will result in a demolition and replacement of the original building for at least the following reasons:

- a) Retaining only 5 of the original 8 structural walls while demolishing everything else ought to constitute a demolition of the building in the ordinary sense of the word.
- b) The *Building Code Act*, provides a definition of "demolish". While the Zoning By-law does not specifically refer to the *Building Code Act*, that definition is nevertheless instructive because under the Construction By-law, work involving a demolition as defined in the *Building Code Act* requires a demolition permit.

Under the *Building Code Act*, "demolish" means to do anything in the removal of a building or any material part thereof and demolition has a corresponding meaning"[emphasis added]. Under the *Building Code Act* definition, retaining only 5 of the original 8 structural walls while removing everything else should be considered to be removal of a "material part" of the building and therefore a demolition.

- c) Even if it is accepted that a building is only demolished when no part of the original is retained, retaining only 5 original walls with no structural integrity effectively results in a total demolition of the building. Although Building Services has not required that a demolition permit be issued, it is sanctioning the simultaneous demolition and replacement of the dwelling under the guise of the alteration permit. As noted above, in order for a conversion of a building to be classified as a "Converted Dwelling", it cannot involve demolition and replacement of the dwelling.

The proposed conversion should not be grandfathered because the site plan application was not "completed" before the Interim Control By-law was enacted

As discussed above, the site plan control approval application for 458 Nelson St. was for the conversion of the existing dwelling to a "Converted Dwelling". However, Building Services has determined that the existing dwelling, in its current state, is not suitable for the proposed conversion and must be rebuilt. Only then can a conversion permit be issued. This means that the starting point for the conversion will be the rebuilt dwelling and not the original dwelling.

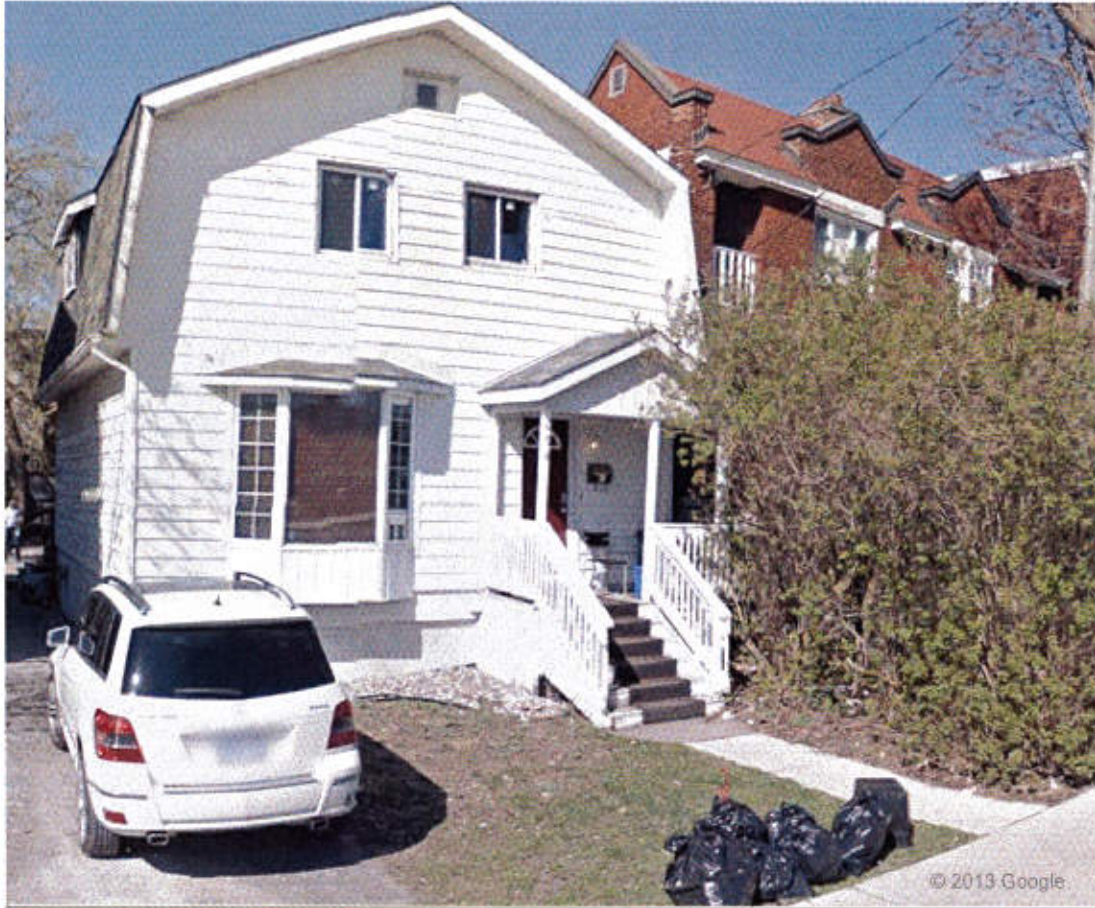
The plans submitted for the site plan control application, however, were based on the original dwelling and not the rebuilt dwelling. Therefore, the site plan control approval application ought not to be considered as having been "completed" when it was applied for and should no longer be grandfathered. This is not the case where the building had already been rebuilt when the application to convert it was made.

Given the above, it is strongly recommended that the Board of ASH request that Councillor Fleury withdraw delegated authority for the 458 Nelson St. site plan approval application to enable public debate on the issues raised by such extreme conversions.



Address **Nelson Street**

Address is approximate



COMMITTEE RECOMMENDATIONS

That Council:

1. Request the Planning and Growth Management Department undertake a study in respect of the land use planning policies associated with the conversion of low-density residential uses to increase the number of dwelling units to three or more for the purposes of assessing the land use planning impact of such developments and establishing further zoning standards to help ensure their compatibility;
2. Enact an Interim Control by-law prohibiting the use Converted Dwelling, as well as prohibiting the conversion of Detached, Linked-detached, Semi-detached and Duplex Dwellings, to a Three-unit Dwelling as these terms are defined within the City of Ottawa Zoning By-law No. 2008-250, within the areas shown on Attachments 1 and 2; and
3. Approve that the Interim Control by-law not apply so as to prevent the issuance of a building permit for the development of a Converted Dwelling, or a Three-unit Dwelling resulting from the conversion of a Detached, Linked-detached, Semi-detached or Duplex Dwelling within the areas shown on Attachments 1 and 2, for which a completed application for a building permit, Committee of Adjustment approval or site plan control approval has been received by April 23, 2013.

CARRIED

From: Beecher, Sophie

Sent: April-17-13 1:29 PM

To: Fleury, Mathieu (Mathieu.Fleury@ottawa.ca); Genest, Mat (Mat.Genest@ottawa.ca)

Cc: 'Jim.Watson@ottawa.ca'; Jane Gurr <jane.gurr@sympatico.ca> (jane.gurr@sympatico.ca); Sam Almsaddi (samalmsaddi@gmail.com); Christopher Collmorgen (christopher_collmorgen@hotmail.com)

Subject: ASH comments on the 458 Nelson proposal

Hello Councillor Fleury,

The following are Action Sandy Hill's comments relating to the proposal for 458 Nelson street, which we ask that you to take into account when proposing changes to City staff on the proposal as part of the Site Plan Lite process. We would be happy to discuss our proposed changes with you and how they can be implemented as a condition of your approval on this file.

- We are opposed to the bulk and overall size of the proposed building. Even though the zoning currently allows for bulky developments on that property, and the number of units allowed under the zoning is respected, the interaction between the allowed dimensions and number of permitted units (without a limit on bedrooms) yields an increase in density that is not intended by the zoning and not proportional with the immediate and broader surroundings, nor with the size of the lot, and cannot be sustained by the lot. Evidence of the fact that the building is too big for the lot is that the entire building needs to be cantilevered to allow access to the back, parking spots have to be placed at the back (thereby removing the backyard), and the public amenity space needs to be placed on the roof, and not at grade, as would be appropriate. This results in messy and awkward construction that is oversized for the available space. In addition, just as the development at 466 Nelson did, this development will have a negative impact on the street scape facing the community park by towering over the street and imposing its poor architecture on every visitor to the park and community centre. As a result, we would suggest scaling back the extension proposed at the back of the existing structure, increasing the setbacks on the sides to allow for car and bicycle circulation to the back of the property, and limiting the height of the structure to the actual building (and not allowing additional height through the addition of utilities and mechanical devices on the roof). This is precisely the type of development that the City has identified as problematic in the infill category and is attempting to address through its infill study.

- On the note of infill, we contend that this proposal constitutes actual infill (as opposed to a conversion) since the developer will be keeping so little of the original building that he will not be converting a home, but rather demolishing it and rebuilding on its original footprint. As a result, the zoning applicable to new constructions should apply.

- We note that the massive tree at the back of the property, which significantly contributes to the canopy (and in some cases constitutes the entire canopy) for the surrounding properties, will be cut down, reducing the presence of trees on the block, and removing all privacy between properties. We would like to see the proposal modified so that the tree can be maintained and not be affected by construction.

- We decry the paving over of the backyard, which is proposed for 458 and 460, and which was also done at 466, since it contributes to the lack of drainage already prevalent on the block,

where basement flooding and water pooling at the bottom of slopes is already problematic. We contend that such massive paving-over also dries out the clay soil, which, as it dries out, contributes to the subsiding of foundations on neighbouring properties. Waiving the requirement for two parking spots is equally unreasonable, since the building will hold approximately 16 occupants, at least two of which are bound to own cars. As a result, we argue that the footprint of the building should be reduced, so that appropriate parking can be provided without having to pave over the only green space available.

- We note that the residents of 466 Nelson need to use the shared driveway between 458 and 460 to get to the back of their own property, since their vehicles do not fit in the narrow driveway of 466 (which is also the result of an oversized building for the lot). We wonder how access to 466 will occur once the properties are massively developed at 460 and 458. Is it allowed to create a parking lot with access through one single driveway that spans the back of three properties?

- We contend that the building of a tall privacy screen on the roof of the building increases its height in an impermissible fashion. The height of the overall construction, including the patio, should be limited to the allowed height under the zoning.

- We also wonder whether the rooftop patio serves as the public amenity space that is required for the building - and if so - whether the patio truly constitutes public space (since the access is limited to one unit), and whether a minor variance is required to (1) have a roof top patio and (2) having the public amenity space elsewhere than at grade. If a minor variance is required, we would argue that that constitutes further evidence that the size of the building is too big for the lot, since the developer is forced to go outside the zoning to fit all of the necessary components to the building and that the building does not respect the density intent of the zoning. Finally, a rooftop patio will significantly contribute to the noise problem we already have in Sandy Hill and will diminish the privacy enjoyed by surrounding residents. We request that the rooftop patio be removed completely. If the patio is kept, we request that the city ensure that the developer obtain any variance required before the patio is built.

- We question whether the stairs to the basement on the side of the house can be placed that close to the property line under the zoning. The width of the stairs is such that the side of the stairs juts beyond the footprint of the original house, and the proposed stairs are so close to the property line that it will be virtually impossible to dig the stairwell without affecting the neighbouring property. We are of the view that the stairs should be placed at the back of the building, under the stairs to the other units.

- The north facing wall of the addition to the original house will be so tall and so long and so close to the neighbouring property that it will deprive the residents of the neighbouring property of most of the sun light to their garden and to their back windows. In addition, the towering wall (which will have some windows) will deprive them completely of their privacy both in their backyard and in the backrooms of their house. Again, we request that the size of the addition be scaled down and that the rear setback be significantly increased to make the proposed development proportionate and appropriate in relation to the surrounding properties, particularly the immediate neighbour to the north.

- We note that bike parking is provided in the front. However, the bike parking should be moved to the rear of the property to keep as much green space as possible in front, avoid a sore sight to the eyes in the front (a jumble of bikes), and prevent trespassing on the neighbouring property by cyclists on their way to the bike rack or in order to tie their bike (as the bike parking would need to be right next to the property line in the front).

In short, we are of the view that this proposal is not appropriate for the context of the immediate block, community park and broader neighbourhood, nor does it respect the intent of the zoning bylaw in terms of density for the property. The proposal should be scaled back and improved according to the comments above.

Sincerely,

Sophie Beecher
Planning Co-chair
Action Sandy Hill

DRAFT

[illegible]

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458 NELSON
RENOVATION

NAME: _____

CITY: _____

BASEMENT PLAN -
PROPOSED

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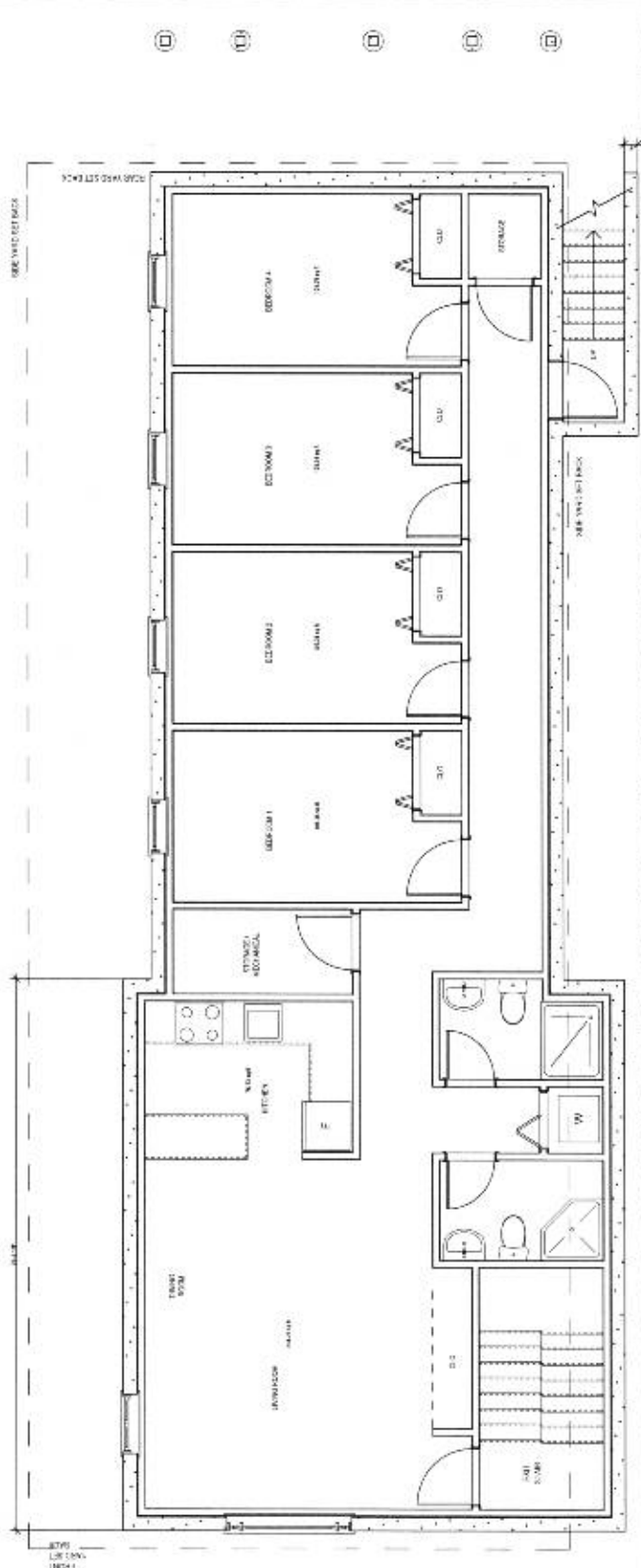
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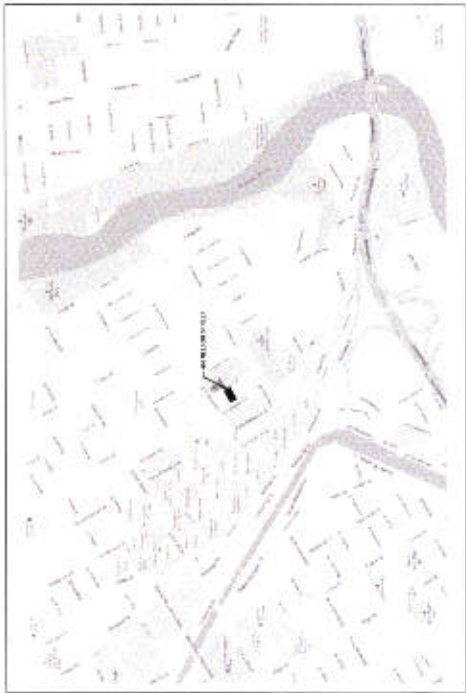
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1 BASEMENT PLAN - PROPOSED



KEY MAP
1:500' SCALE

NOTES:
1. THE PROPOSED DEVELOPMENT IS LOCATED WITHIN THE 15632 ZONING DISTRICT, WHICH IS A RESIDENTIAL ZONING DISTRICT. THE PROPOSED DEVELOPMENT IS A SINGLE-FAMILY RESIDENTIAL DEVELOPMENT.
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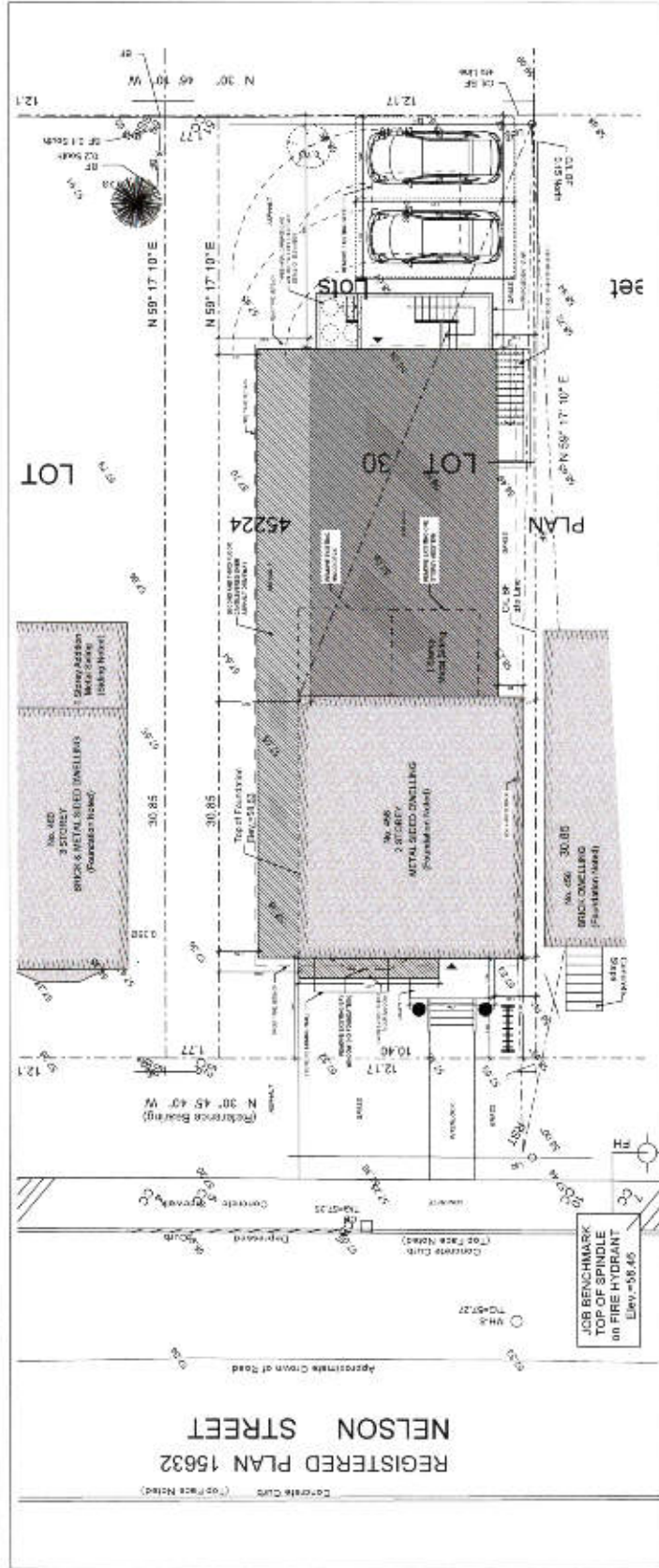
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REGISTERED SITE PLAN 15632

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REGISTERED SITE PLAN 15632



