

Report to Development Permit Panel

To:

Development Permit Panel

Date:

June 21, 2010

From:

Brian J. Jackson, MCIP

File:

DP 10-519994

Re:

Director of Development

Application by Hi-Quality Properties Ltd. for a Development Permit at 7300,

7340, 7360, 7380 and 7420 Blundell Road

Staff Recommendation

That a Development Permit be issued which would:

- 1. Permit the construction of 26 townhouse units at 7300, 7340, 7360, 7380 and 7420 Blundell Road on a site zoned Low Density Townhouses (RTL3); and
- 2. Vary the provisions of Richmond Zoning Bylaw 8500 to:
 - a) reduce the minimum front yard setback from 6.0 m to 4.95 m for Building No. 1;
 - b) reduce the minimum front yard setback from 6.0 m to 5.20 m for Building No. 10; and
 - c) reduce the minimum west side yard setback from 3.0 m to 1.98 m for Building No. 9.

Brian J. Jackson, MCIP Director of Development

EL:blg Att.

Staff Report

Origin

Hi-Quality Properties Ltd. has applied to the City of Richmond for permission to develop 26 townhouse units at 7300, 7340, 7360, 7380 and 7420 Blundell Road. This site is being rezoned from Single Detached (RS1/E) to Low Density Townhouse (RTL3) for this project under Bylaw 8149 (RZ 05-320327, 7300 and 7340 Blundell Road) and Bylaw 8150 (RZ 05-320332, 7360, 7380 and 7420 Blundell Road). The zoning district names have changed as the rezoning applications were submitted under the former Zoning & Development Bylaw No. 5300 to rezone the site from "Single-Family Housing District, Subdivision Area E (R1/E)" to "Townhouse District (R2-0.6)".

Originally, the two (2) sites (7300/7340 Blundell Road and 7360/7380/7420 Blundell Road) were owned by different developers and they were proposing two (2) side-by-side townhouse projects sharing the entry driveway and the amenity space. The two (2) sites have now been purchased by the applicant, and one (1) consolidated townhouse development project is proposed.

The site is currently vacant. There is no City standard Servicing Agreement required in association with this development proposal. Removal of the existing driveways on Blundell Road and re-instating continuity of the sidewalk will be achieved via Works Order at Building Permit stage.

Development Information

Please refer to the attached Development Application Data Sheet (Attachment 1) for a comparison of the proposed development data with the relevant Bylaw requirements.

Background

The subject site is located within the Broadmoor Area – Sunnymede North Sub-Area, Schedule 2.6C of the Official Community Plan (OCP). The Sub-Area Plan promotes a coordinated approach to multi-family housing in the Sunnymede North Sub-Area, controls access onto Blundell Road, and exercises greater control over the form and character of development to ensure a harmonious transition between the medium density residential district to the north in the City Centre and the low density single-family area to the south in Broadmoor. The existing development surrounding the site is described as follows:

To the North: Across Blundell Road, larger apartment buildings typically three-storeys over

parking in height, zoned Medium Density Low Rise Apartments (RAM1);

To the East: A 41-unit townhouse development zoned Town Housing (ZT8);

To the South: On the north side of Sunnymede Crescent, are single-family residential lots zoned

Single-Family Housing District, Subdivision Area E (R1/E); and

To the West: A 14-unit townhouse development zoned Town Housing (ZT9).

Rezoning and Public Hearing Results

During the rezoning process, staff identified the following design issues to be resolved at the Development Permit stage:

- Location of garbage and recycling facilities, site signage, etc.;
- Opportunities for Convertible Units;
- Final tree retention/replacement strategy; and
- Landscaping design in accordance with the Official Community Plan (OCP).

These issues were carefully reviewed during the Development Permit process. Details are discussed in the "Analysis" section of this report.

The Public Hearing for the rezoning applications was held on April 16, 2007. At the Public Hearing, the residents from the adjacent single-family lots to the south expressed their concerns about the potential damages to the hedges along the common property line.

During the Development Permit process, staff worked with the applicant to ensure that the existing hedge along the south property line will be retained and protected. Tree protection barriers will be installed to protect the existing hedgerow along the south property line and any vegetation on the adjacent properties to the south within 2 m from the property line. The developer is required to provide proof of a contract with a Certified Arborist for supervision of on-site works conducted on the subject site close to the hedgerow along the south property line. A landscaping security in the amount of \$14,000 (in addition to the typical landscaping security for a multiple-family project) is also required to ensure survival of the trees and hedgerow being retained on site.

Staff Comments

The proposed scheme attached to this report has satisfactorily addressed the significant urban design issues and other staff comments identified as part of the review of the subject Development Permit application. In addition, it complies with the intent of the applicable sections of the Official Community Plan (OCP) and is generally in compliance with the Low Density Townhouse (RTL3), except for the zoning variances noted below.

Zoning Compliance/Variances (staff comments in bold)

The applicant requests to vary the provisions of Richmond Zoning Bylaw 8500 to:

- 1) Reduce the minimum front yard setback from 6.0 m to 4.95 m for Building No. 1.
 - (Staff supports the proposed variance, as the variance is a result of a dedication of land for public use (a 3 m x 1.05 m bus pad) along the Blundell Road frontage. The setback variance allows for a more consistent streetscape along a major arterial road by maintaining continuity of the sidewalk width and buildings' alignment. Landscaping surrounding the bus pad has been designed with CPTED principles in mind.)
- 2) Reduce the minimum front yard setback from 6.0 m to 5.20 m for Building No. 10.
 - (Staff supports the proposed variance, as the variance is a result of a road dedication along the Blundell Road frontage. The setback variance allows for a more consistent streetscape along a major arterial road.)

3) Reduce the minimum west side yard setback from 3.0 m to 1.98 m for Building No. 9.

(Staff supports the proposed variance, as the reductions to the side yard setback permit a projection to break up a mass of exterior wall and to improve the design of the end unit façade. The variance is not anticipated to result in privacy overlook issues as there is no window proposed at the second floor projection. This variance will not impact tree preservation on site.)

Advisory Design Panel Comments

The original proposal (2 side-by-side townhouse projects) was reviewed by the Advisory Design Panel under previous Development Permit Applications DP 07-374117 (7300 and 7340 Blundell Road) and DP 07-380831 (7360, 7380 and 7420 Blundell Road). The Advisory Design Panel was generally supportive of the proposed developments and decided that the projects should proceed to the Development Permit Panel for consideration.

Since the current proposal follows the design scheme of the original development plans, the current proposal was not presented for a second time to the Advisory Design Panel. A copy of the relevant excerpt from the Advisory Design Panel Minutes from Wednesday, April 9, 2008 is attached for reference (Attachment 2). The design response from the applicant has been included immediately following the specific Design Panel comments and is identified in 'bold italics'.

Analysis

Conditions of Adjacency

- The proposed height, siting and orientation of the buildings respect the massing of the surrounding existing residential developments.
- The small scale duplex units fit well to existing single-family and small-scale townhouse neighbourhood to the south and along Blundell Road, respectively.
- The increased rear yard setback (5.25 m) provides appropriate private outdoor open space for the units at the back of the site and minimizes the impact of the proposed development to existing single-family houses to the south on Sunnymede Crescent.
- Increased rear yard setback will also facilitate retention of existing hedges along the rear property line to provide a natural screen between the proposed development and the existing single-family development to the south. The lower branches of these hedges will be pruned up to 2.13 m (7 ft.) from the ground to accommodate the installation of a 1.8 m high fence along the south property line.
- Additional trees will be planted in the back yards of the duplex units, outside of the statutory right-of- way (ROW) along the rear property line.
- The site grade within the backyards will be raised to approximately 1.24 m geodetic. Perimeter drainage will be required as part of the Building Permit to ensure storm water remains within the property and will not spill over to neighbouring properties.
- No grade change is proposed along the rear property line where an existing hedgerow is to be retained.

Urban Design and Site Planning

- Seven (7) two-storey duplexes fronting Blundell Road and six (6) duplexes facing the internal driveway are proposed. This form of development fits well into the scale of the immediate urban context.
- Pedestrian frontage character facing Blundell Road, including direct pedestrian entry to the units from the city sidewalk, has been incorporated to enhance the residential streetscape; low metal fence and brick columns are proposed along the front property line.
- The site layout is organized around one (1) driveway providing access to the site from Blundell Road and an east-west drive aisle providing access to the unit garages.
- Every unit has two (2) side-by-side parking spaces. A total of six (6) visitor parking spaces are provided throughout the site, including one (1) accessible parking space.
- The provision of bicycle parking exceeds the bylaw requirement with 52 Class-1 spaces provided within the garages and six (6) Class-2 spaces provided on either sides of the entry driveway.
- The outdoor amenity area is proposed at the entry point for maximum exposure. The size and location of the outdoor amenity space, within the central portion of the site, is appropriate in providing open landscape and amenity convenient to all of the units. Quality of this amenity space is enhanced by incorporating tree retention into the design.
- Mailboxes and short-term bicycle parking spaces are also located at a central location next to the outdoor amenity area.
- The garbage and recycling enclosure is located on the east side of the entry driveway and has been incorporated into the design of the building to minimize its visual impact.

Architectural Form and Character

- The building forms are well articulated.
- The impact of blank garage doors has been mitigated with panel patterned doors, transom windows, overhanging roof skirts, planting islands, and pedestrian entries.
- A pedestrian scale is provided at the ground floor level of the units along the public street and driveway with the inclusion of windows, doors, porches, and landscape features.
- Visual interest and variety has been incorporated with gable roofs, porches, varying material combinations and a range of colour finishes.
- The proposed building materials (cedar shingle siding, hardie panel, hardie-plank siding, wood brackets, split-face granite stone finish, double glazed vinyl framed window with wood side trim and still, and asphalt roof shingles) are generally consistent with the Official Community Plan (OCP) Guidelines.
- The colour palette includes a range of earth tone colours, highlighted with contrasting trims and red or green entry doors.
- Two (2) convertible units have been incorporated into the design. Alternate floor plans demonstrating simple conversion potential to accommodate a person in a wheelchair are provided (see alternative floor plans for units "B1" and "B1a" where an elevator may be installed).

Accessibility features that allow for aging in place have been incorporated into this
development (i.e., blocking in all bathrooms for grab-bars, level handle for all doors, and
lever faucet in all bathrooms and powder rooms).

Tree Preservation

- At rezoning stage, 62 bylaw-sized trees were noted on site, and 57 of them were identified for removal.
- The applicant has applied for a Tree Cutting Permit after the rezoning applications for the development proposal achieved Third Reading. A Tree Cutting Permit (TP 07-394362) was issued for the removal of five (5) trees due to impeding of demolition; ten (10) replacement trees were required.
- Tree retention was revisited as part of the Development Permit review process. The City's Tree Preservation Coordinator has reviewed the updated Arborist Report and confirmed that there are 59 bylaw-sized trees left on the development site.
- 23 trees are proposed for removal due to structural defects from previous topping (significant removal of upper canopy due to either hydro line clearance or poor past pruning) resulting in decay at old pruning cuts.
- 20 trees are proposed for removal due to either natural structural defects or bacterial canker and blight infections.
- Nine (9) trees are proposed for removal due to building conflict. It is noted that tree tag #462 (25cm cal. Douglas Fir) is identified as in "good condition" and tree tag #607 (23cm cal. White Pine) is identified as in "fair condition". The City's Tree Preservation Coordinator recommends that these two (2) native trees be relocated or compensated for at a 2:1 ratio with two (2) of the replacement trees at a larger calliper size (a minimum12-14cm calliper). The applicant has agreed to provide two (2) large replacement trees, which are included in the Landscape Plan.
- Seven (7) trees are to be retained and protected on site.
- Based on the 2:1 tree replacement ratio goal stated in the Official Community Plan (OCP), 104 replacement trees are required.
- The applicant is proposing to remove one (1) bylaw-sized tree located on the south property line due to poor condition. A consent letter from the adjacent property owner (7591 Sunnymede Crescent) is on file. Two (2) replacement trees are required.
- Including the ten (10) replacement trees required as part of the Tree Permit, a total of 116 replacement trees are required for this development. Considering the effort made by the applicant to retain seven (7) bylaw-sized trees on site, staff recommend fourteen (14) replacement trees be exempted. As a condition to Development Permit issuance, the applicant is required to submit a \$14,000 landscaping security (in addition to the typical landscaping security for a multiple-family development) to ensure the successful retention of the seven (7) bylaw-sized tree and the hedgerow along the rear property line.
- The applicant is proposing to plant 80 replacement trees on-site and provide cash-in-lieu in the amount of \$11,000 for off-site planting of the balance of the replacement trees (22 trees) prior to issuance of the Development Permit.
- The applicant has committed to the protection of the hedgerow located along the rear property line and three (3) bylaw-sized trees located on the adjacent property to the east (7600 Blundell Road) within 2 m of the property line. Tree protection fencing on-site around the driplines of all trees to be retained on the neighbouring properties will be

- required prior to any construction activities, including building demolition, occurring on-site.
- A contract with a certified arborist to oversee all site preparation activities, inspect tree protection fencing, and supervise any tree removals, and fence installation during various stage of the development will be secured prior to the issuance of the Development Permit.

Landscape Design and Open Space Design

- The landscape design was developed considering tree retention. A good specimen Oak tree and a Western Red Cedar tree are to be preserved on site in the proposed amenity area. Another two (2) Western Red Cedar tree and three (3) Douglas Fir trees are to be retained in the front yard and along the entry driveway.
- The landscape design includes the planting of trees (including large calliper and ornamental species) and a variety of shrubs and ground covers, which meets the Official Community Plan (OCP) guidelines for tree replacement and landscaping. The proposed lot coverage for landscaping with live plant materials is 31.5%.
- Permeable concrete paver is proposed for the patios to improve permeability and to provide flexibility for future residents to increase their lawn or planting area should they desire.
- Paving treatment includes a variety of materials and contrasting colours to mitigate the length of the drive aisle and to differentiate between drive isle, visitor parking, and pedestrian entrances. Permeable concrete paver is proposed on a portion of the drive isle and common areas (i.e. mailbox kiosk, visitor parking) to improve site permeability and minimize the visual impact of large areas of asphalt. The proposed total lot coverage for permeable surface, including landscape area, is 45%.
- The landscape design also includes an outdoor amenity area in excess of the Official Community Plan (OCP) guidelines at a central location.
- A children's play equipment, benches, and a large lawn area under the existing Oak tree is proposed in the outdoor amenity area.
- Cash-in-lieu for indoor amenity has been provided as a condition of rezoning approvals.

Affordable Housing

• A voluntary contribution towards the City's Affordable Housing Reserve Fund was secured through the rezoning applications in the amount of \$0.60 per square foot of maximum floor area ratio. This complies with the interim Affordable Housing Strategy for rezoning applications received prior to July 1, 2007.

Crime Prevention Through Environmental Design

- The site design provides both internal unit privacy and passive surveillance of internal roadways and communal areas to enhance safety for residents;
- Effective lighting of buildings, open spaces, parking areas, and along the drive aisles will be provided; and
- Landscape area is designed to allow visual surveillance between top of low-growing shrubs and tree branches that are approximately 1.8 m above ground level.

Sustainability

- The applicant advises that the project includes the following sustainability features:
 - > 2 x 6 exterior walls with R20 insulation;
 - > roof insulation to R40 standards;
 - low-E glass for all windows;
 - > rigid insulation entirely under concrete slab except in garages;
 - > energy star appliances;
 - > temperature control switch in each room;
 - > water efficient plumbing fixtures;
 - > solar powered lighting system in mailbox area and common bicycle rack area;
 - > drought tolerant and native planting; and
 - > large permeable paving areas.

Conclusions

The applicant has satisfactorily addressed staff's comments regarding conditions of adjacency, site planning and urban design, architectural form and character, and landscape design. The applicant has presented a development that fits into the existing context. Therefore, staff recommend support of this Development Permit application

Edwin Lee Planning Technician – Design (602-276-4121)

EL:blg

The following are to be met prior to forwarding this application to Council for approval:

- Consolidation of 7300, 7340, 7360, 7380, 7420 Blundell Road into one (1) development parcel.
- Payment of cash-in-lieu of on-site indoor amenity space in the amount of \$33,000 as per the Official Community Plan (OCP).
- Receipt of a Letter-of-Credit for landscaping in the amount of \$109,162.54 (typical landscaping security based on total floor area of 47,581.27 ft² plus an additional survival security of \$14,000 for the 7 bylaw sized trees to be retained on site and the existing hedgerow along the south property line).
- City acceptance of the developer's offer to voluntarily contribute \$11,000 to the City's Tree Compensation Fund in-lieu of planting 22 replacement trees on site.
- Provide proof of contract with a Certified Arborist for supervision of on-site works conducted on the subject site close to all trees and the hedgerows to be retained on the subject site and the adjacent properties. This includes overseeing all site preparation activities, inspection of tree protection fencing, and supervision of any tree removals, pruning, and fence installation during various stages of the development. The contract should include provisions for completion of a post-impact assessment report (if applicable) to be reviewed by the City.

Prior to future Building Permit issuance, the developer is required to complete the following:

- The applicant is required to obtain a Building Permit for any construction hoarding associated with the proposed development. If construction hoarding is required to temporarily occupy a street, or any part thereof, or occupy the air space above a street or any part thereof, additional City approvals and associated fees may be required as part of the Building Permit. For further information on the Building Permit, please contact Building Approvals Division at 604-276-4285.
- Submission of a construction traffic and parking management plan to the satisfaction of the City's Transportation Division (http://www.richmond.ca/services/ttp/special.htm).



Development Application Data Sheet

Development Applications Division

DP 10-519994 **Attachment 1**

Address: 7300, 7340, 7360, 7380 and 7420 Blundell Road

Applicant: Hi-Quality Properties Ltd. Owner: Hi-Quality Properties Ltd.

Planning Area(s): Broadmoor Area - Sunnymede North Sub-Area, Schedule 2.6C

Floor Area Gross: 4,420.3 m² Floor Area Net: 3,403.0 m²

	Existing	Proposed
Site Area:	5,743 m ²	5,728 m ²
Land Uses:	Single-Family Residential	Townhouse Residential
OCP Designation:	Low Density Residential	No Change
Zoning:	Single Detached (RS1/E)	Low Density Townhouses (RTL3)
Number of Units:	Formerly 5 single-family dwellings	26 townhouse units

	Bylaw Requirement	Proposed	Variance
Floor Area Ratio:	0.6	0.594	none permitted
Lot Coverage for Buildings:	Max. 40%	40%	none
Lot Coverage for buildings, structures & non-porous surfaces:			none
Lot Coverage for Landscaping with Live Plant Material:	Min. 30%	31.5%	none
Setback Front Yard:	Min. 6.0 m	4.95 m	max. 1.05 m projection for Bldg. #1 and max. 0.8 m projection for Bldg. #10
Setback – Side Yard (East):	Min. 3.0 m	3 m	none
Setback Side Yard (West):	Min, 3.0 m	1.98 m	max. 1.02 m projection for Bldg. # 9
Setback Rear Yard:	Min. 3.0 m	5.25 m	none
Height (m):	Max. 12.0 m	8.8 m	none
Lot Size:	min. 30 m wide x 35 m deep	125 m wide x 45 m deep	none
Off-street Parking Spaces – Resident/Visitor:	2 and 0.2 per unit	2 and 0.23 per unit	none
Off-street Parking Spaces – Accessible:	1	1	none
Total off-street Spaces:	58	58	none

Tandem Parking Spaces	not permitted	none	none
Bicycle Parking Space - Class-1	1.25 spaces per unit = 33 spaces	52	none
Bicycle Parking Space – Class-2	0.2 spaces per unit = 6 spaces	6	none
Amenity Space – Indoor:	Min. 70 m ²	cash-in-lieu	none
Amenity Space – Outdoor:	Min. 6 m ² per unit = 156 m ²	299 m²	none

Excerpt from the Minutes from The Design Panel Meeting

Wednesday, April 9, 2008 – 4:00 p.m. Rm. M.1.003 Richmond City Hall

The design response from the applicant has been included immediately following the specific Design Panel comments and is identified in 'bold italics'.

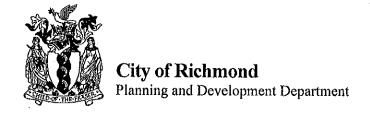
The comments of the Panel were as follows:

- 1. Consider further design development of side elevations visible from drive aisle and end units; More architectural character is added on the side elevations. Granite stone finished fireplace is introduced on street fronting end units. Granite stone finished chimney is introduced on two units at entry driveway area. No vinyl siding is used on the exterior wall through out all buildings.
- 2. Consider using pavers rather than asphalt over the entire length of the drive aisle; Pavers are used entirely in the entry driveway area and asphalt paving area is significantly reduced.
- 3. Consider designating and including provisions to establish Units Bb and Bc as accessible; Unit name (type) is not matching but we have provided two convertible units near accessible parking stall.
- 4. Address CPTED concerns with respect to recessed entrances, address illumination, select appropriately sized landscaping and demonstrate adequate sight lines;

 The recessed entry area will be illuminated by pot lights under lower roof overhang, motion censored lighting fixture will be installed along the entry walkway. Low growing plants are proposed in the entry walkway area to provide good surveillance and visitor parking stall are provided at 4 locations so that the entry walkway in these area are open to common area. All recessed entries are visible from bedroom windows of the units across the internal road and adjacent townhouse unit.
- 5. Consider varying garage doors to add character;

 Two styles are introduced and wood brackets are added beside garage doors to add character.
- 6. Introduce greater variety to the plant list; and Wider range of plants had been added. These added plant were shown on Plant List with * mark.
- 7. Reconsider treatment between buildings, and consider combining walkways between buildings.

We would like to maintain single family home character by providing individual entry walkway. Combining walkways would give apartment like entry and wouldn't reduce the paved area significantly in a small project.



Development Permit

No. DP 10-519994

To the Holder:

HI-QUALITY PROPERTIES LTD.

Property Address:

7300, 7340, 7360, 7380 AND 7420 BLUNDELL ROAD

Address:

C/O YAMAMOTO ARCHITECTURE INC.

2386 OAK STREET

VANCOUVER, B.C. V6H 4J1

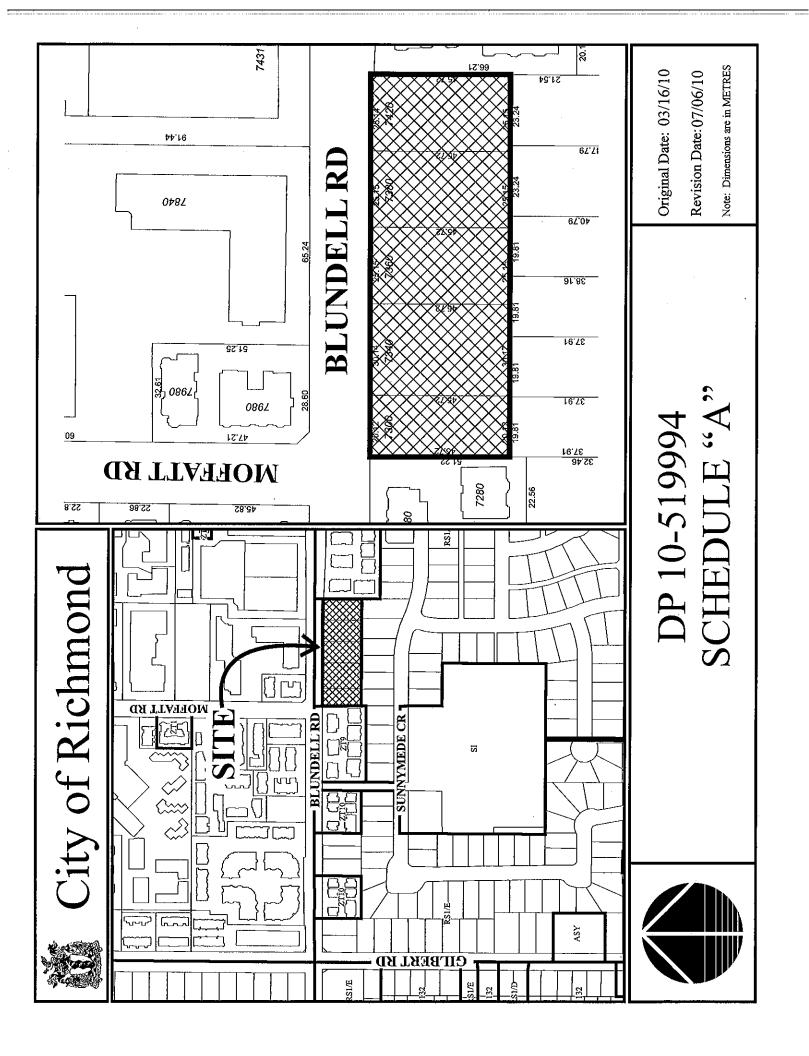
- 1. This Development Permit is issued subject to compliance with all of the Bylaws of the City applicable thereto, except as specifically varied or supplemented by this Permit.
- 2. This Development Permit applies to and only to those lands shown cross-hatched on the attached Schedule "A" and any and all buildings, structures and other development thereon.
- 3. The "Richmond Zoning Bylaw 8500" is hereby varied to:
 - a) reduce the minimum front yard setback from 6.0 m to 4.95 m for Building No. 1;
 - b) reduce the minimum front yard setback from 6.0 m to 5.20 m for Building No. 10; and
 - c) reduce the minimum west side yard setback from 3.0 m to 1.98 m for Building No. 9.
- 4. Subject to Section 692 of the Local Government Act, R.S.B.C.: buildings and structures; off-street parking and loading facilities; roads and parking areas; and landscaping and screening shall be constructed generally in accordance with Plans #1 to #4 attached hereto.
- 5. Sanitary sewers, water, drainage, highways, street lighting, underground wiring, and sidewalks, shall be provided as required.
- 6. As a condition of the issuance of this Permit, the City is holding the security in the amount of \$109,162.54 to ensure that development is carried out in accordance with the terms and conditions of this Permit. Should any interest be earned upon the security, it shall accrue to the Holder if the security is returned. The condition of the posting of the security is that should the Holder fail to carry out the development hereby authorized, according to the terms and conditions of this Permit within the time provided, the City may use the security to carry out the work by its servants, agents or contractors, and any surplus shall be paid over to the Holder. Should the Holder carry out the development permitted by this permit within the time set out herein, the security shall be returned to the Holder. The City may retain the security for up to one year after inspection of the completed landscaping in order to ensure that plant material has survived.
- 7. If the Holder does not commence the construction permitted by this Permit within 24 months of the date of this Permit, this Permit shall lapse and the security shall be returned in full.

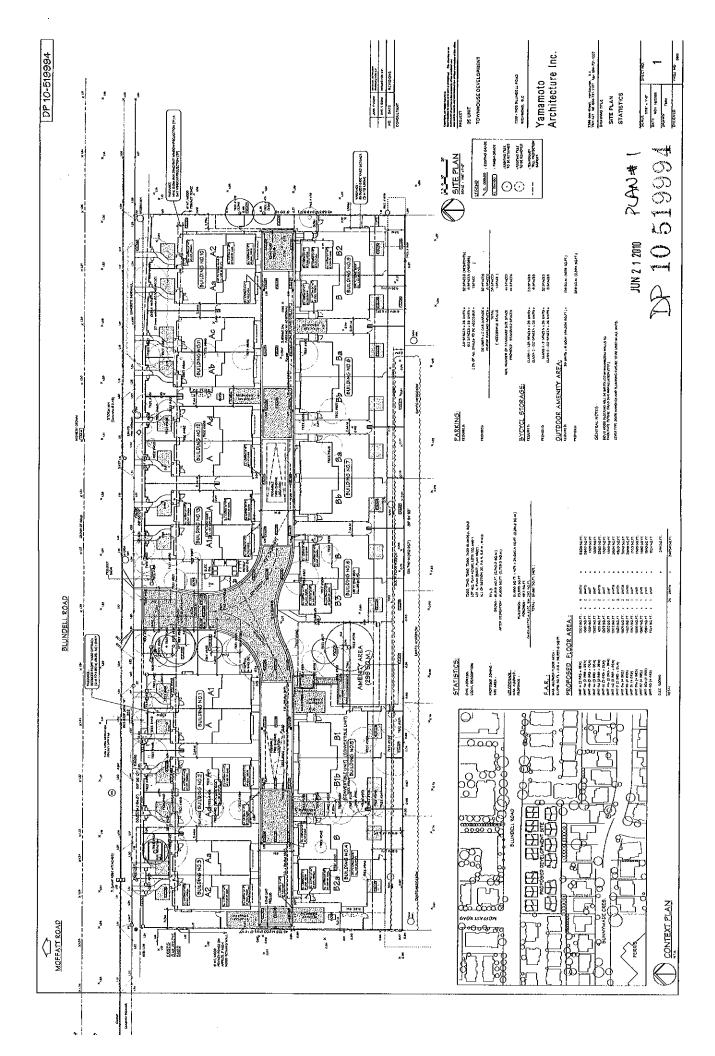
Development Permit

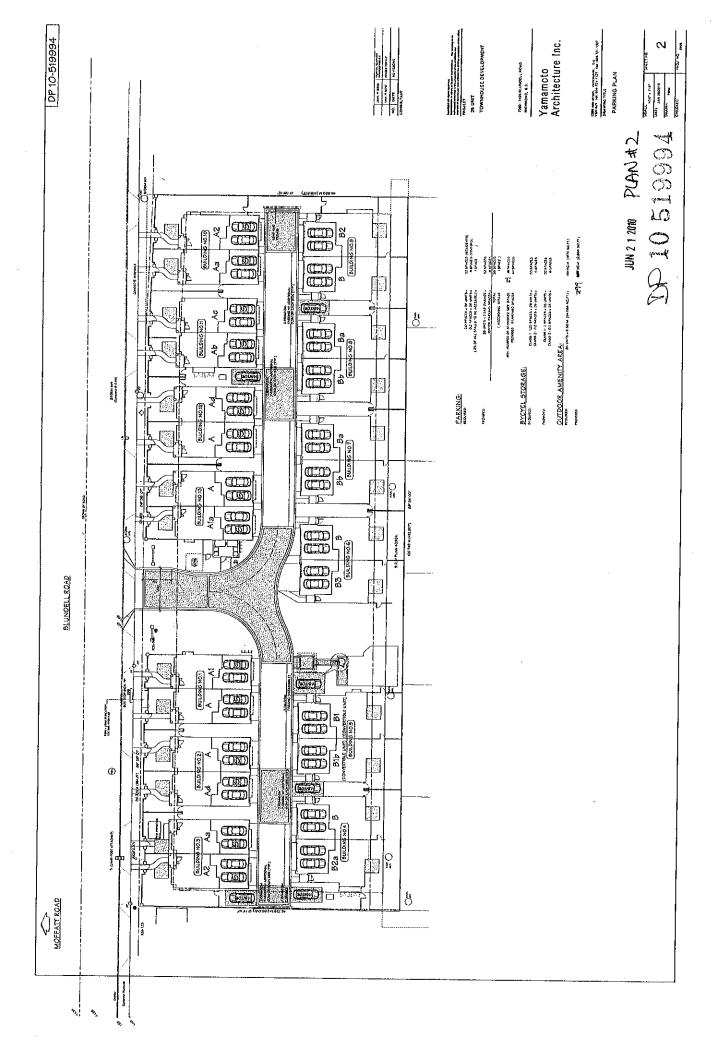
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To the Holder:	HI-QUALITY PROPERTIES LTD.
Property Address:	7300, 7340, 7360, 7380 AND 7420 BLUNDELL ROAD
Address:	C/O YAMAMOTO ARCHITECTURE INC. 2386 OAK STREET VANCOUVER, B.C. V6H 4J1
conditions and provisions	shall be developed generally in accordance with the terms and of this Permit and any plans and specifications attached to this
Permit which shall form a	part hereof.
This Permit is not a Build	ing Permit.
AUTHORIZING RESOLUTI DAY OF ,	ON NO. ISSUED BY THE COUNCIL THE
DELIVERED THIS D	AY OF , .

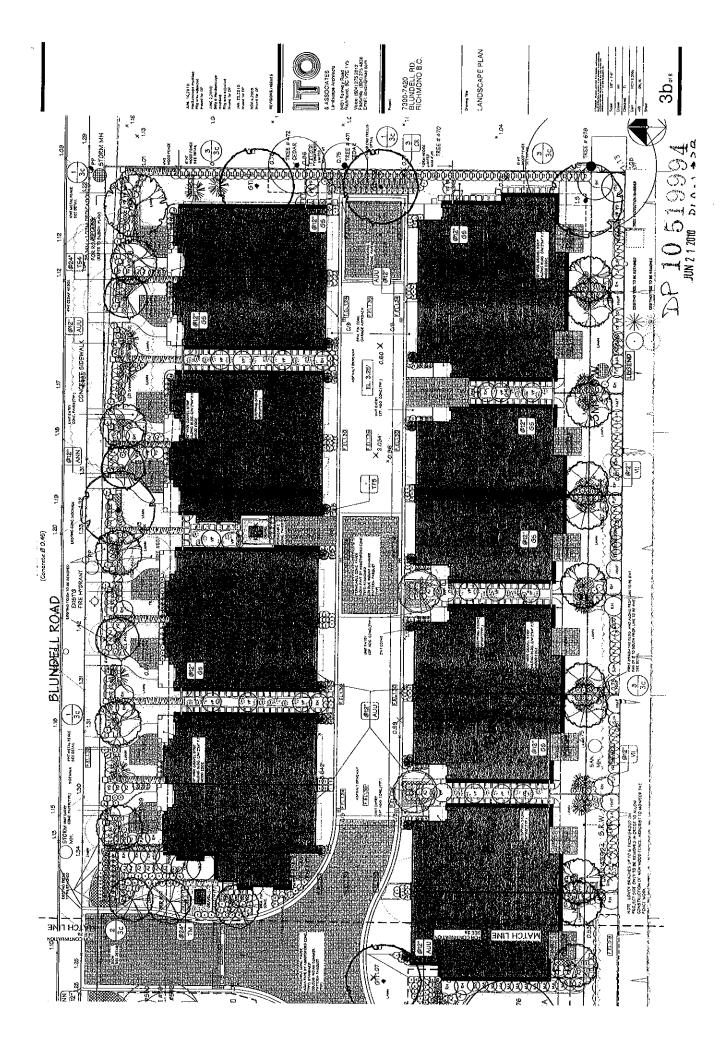
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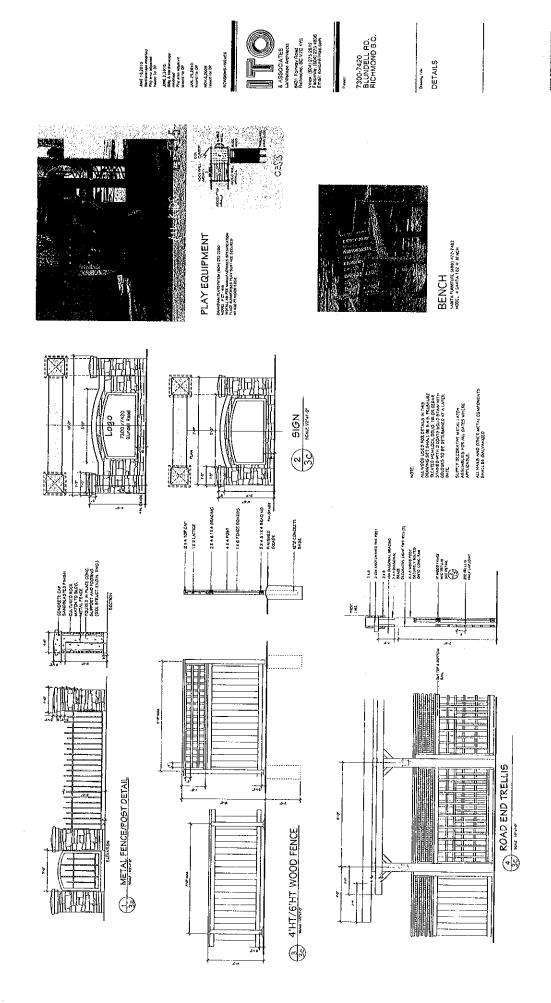




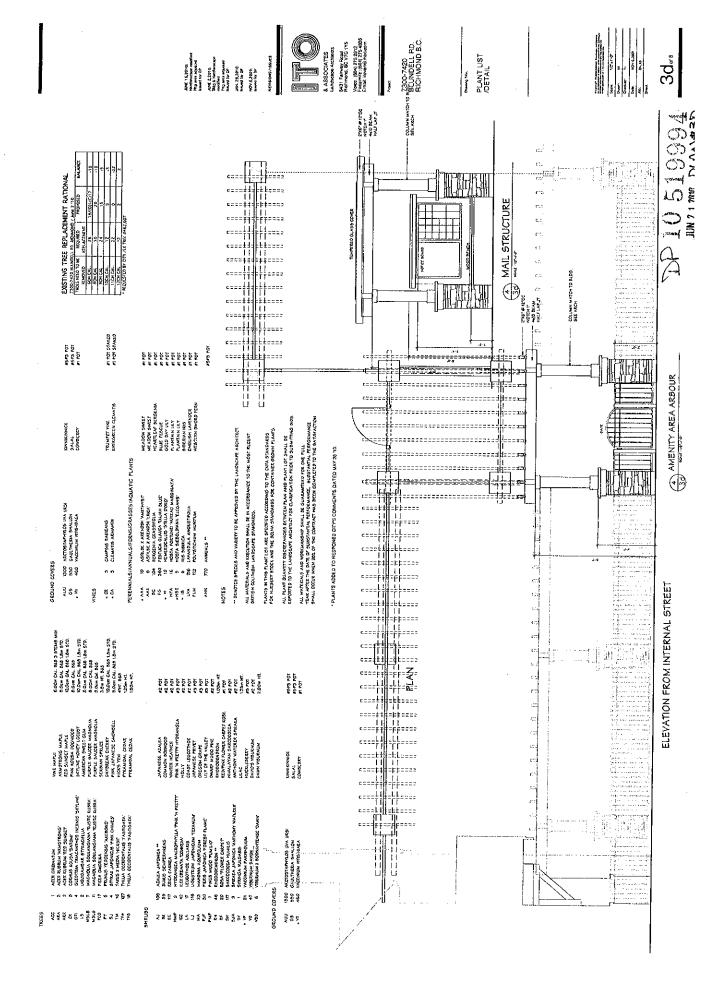


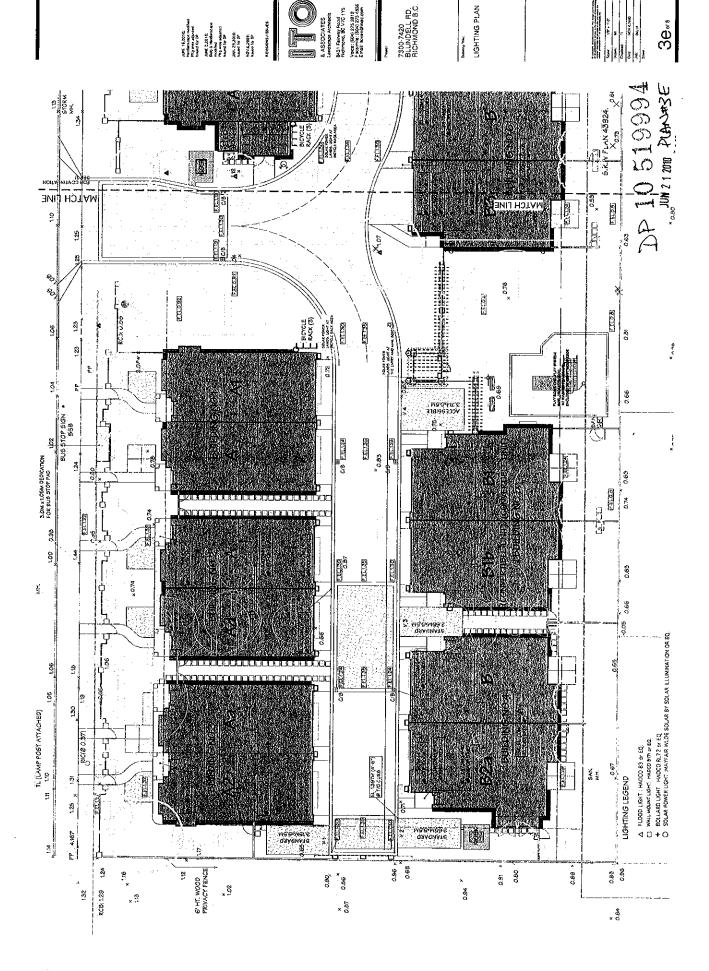
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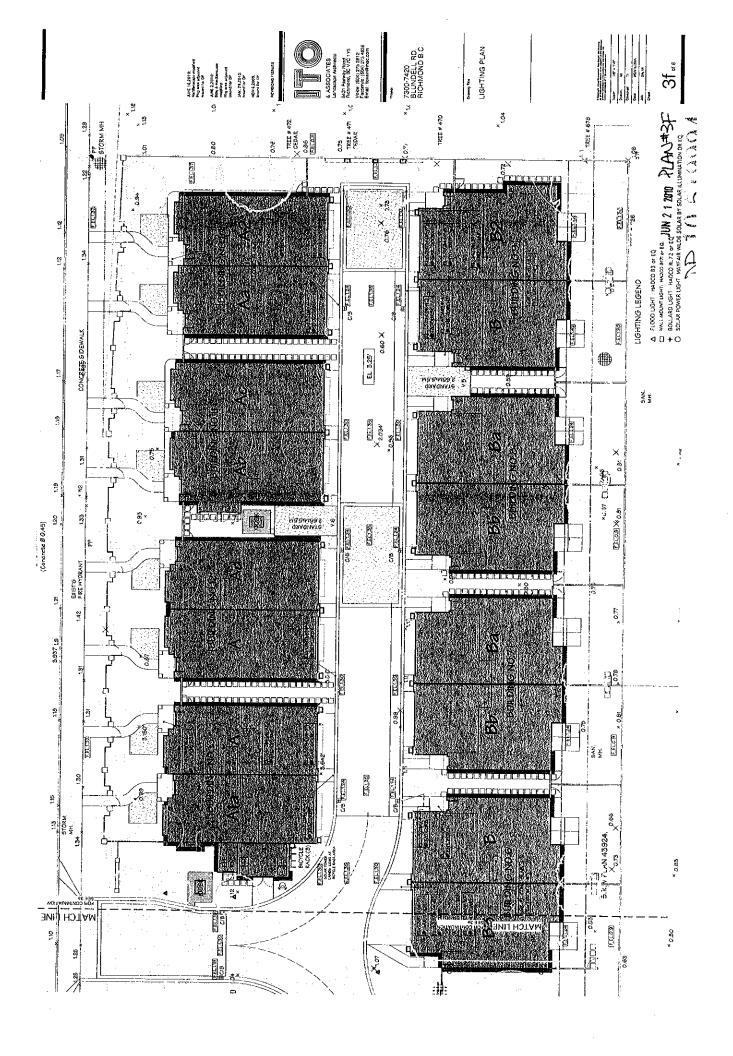


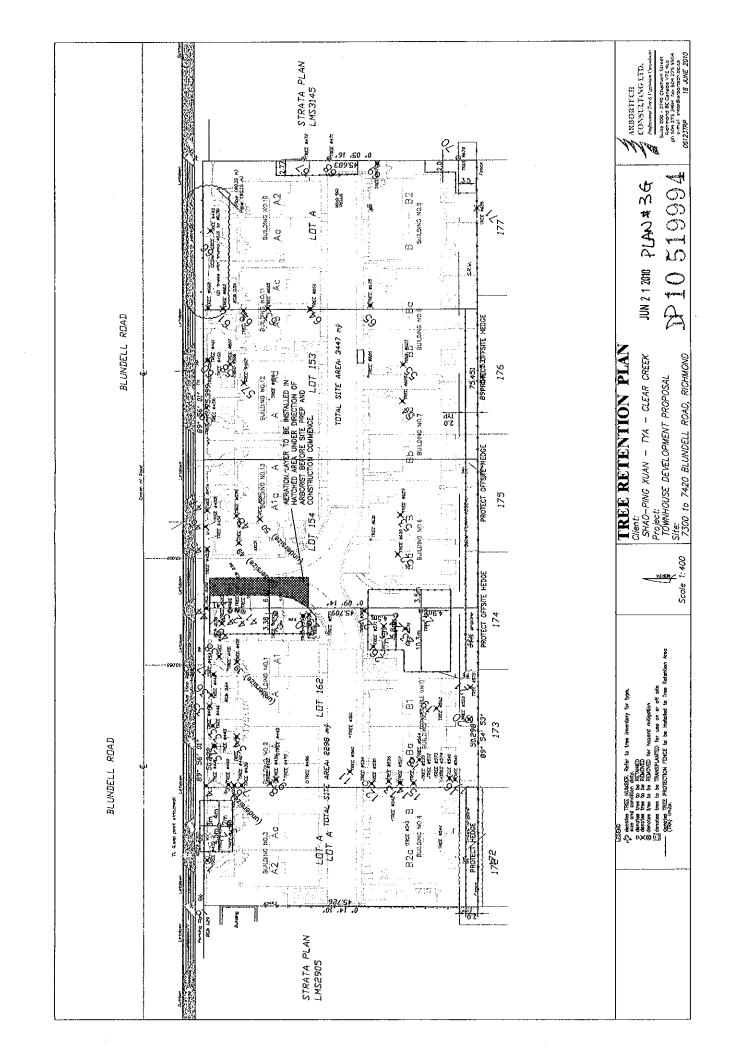


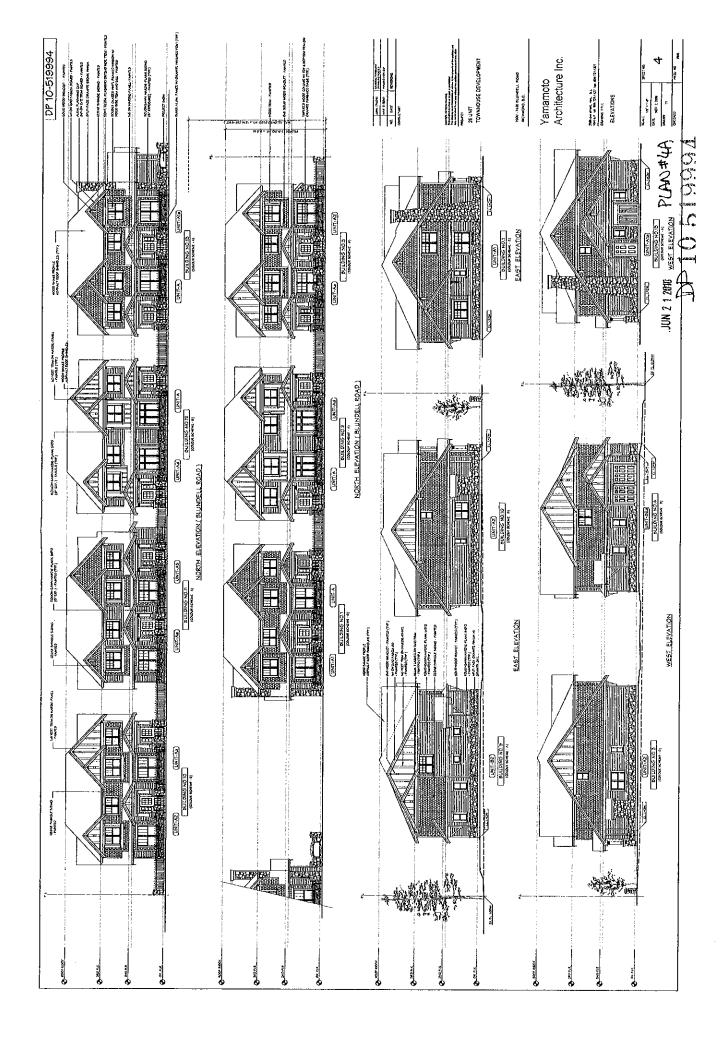
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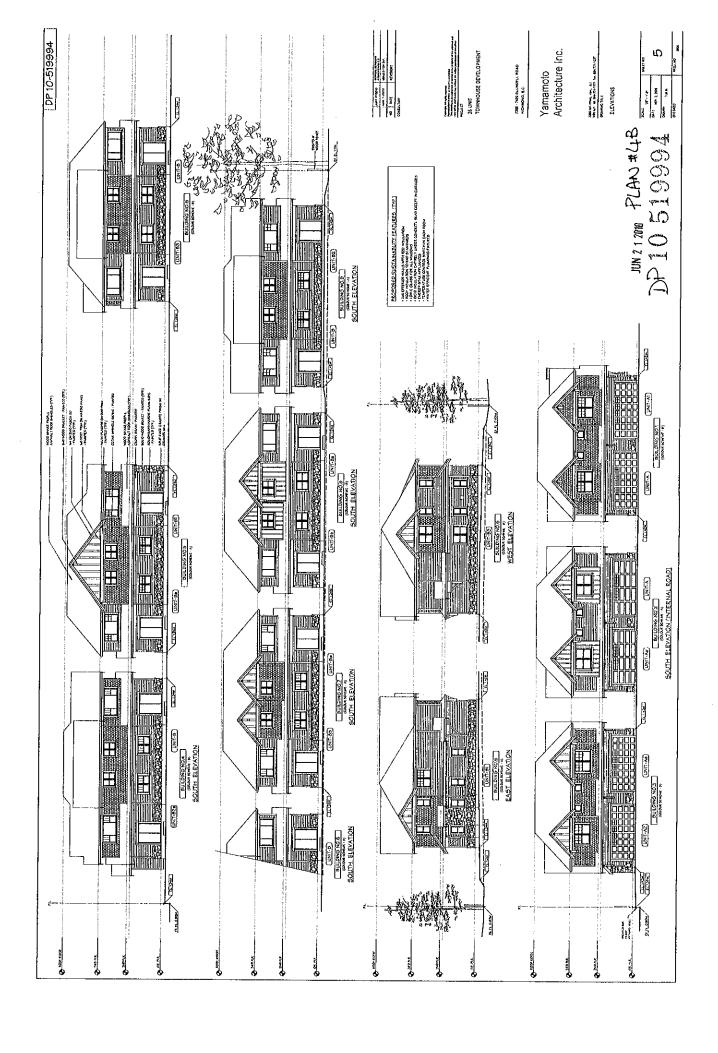


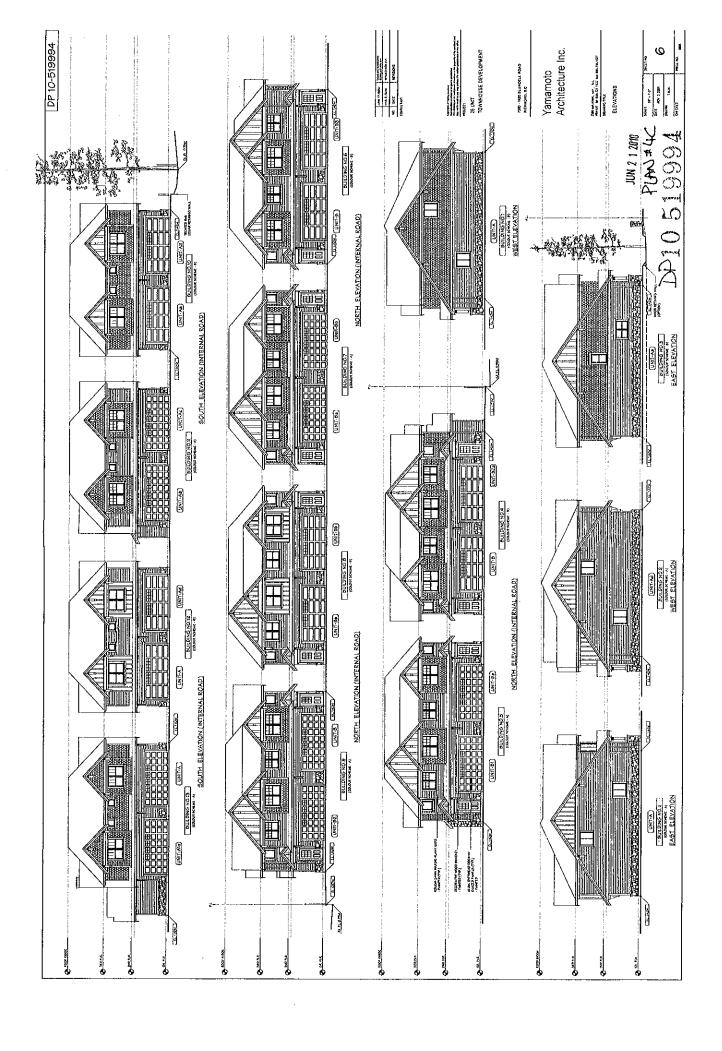


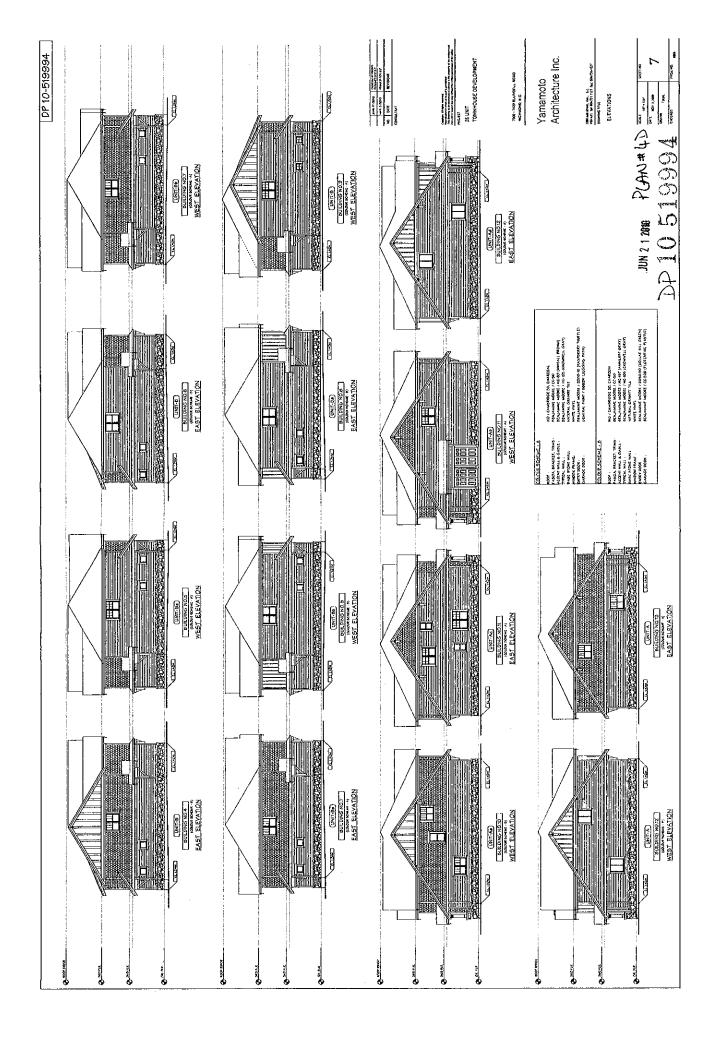


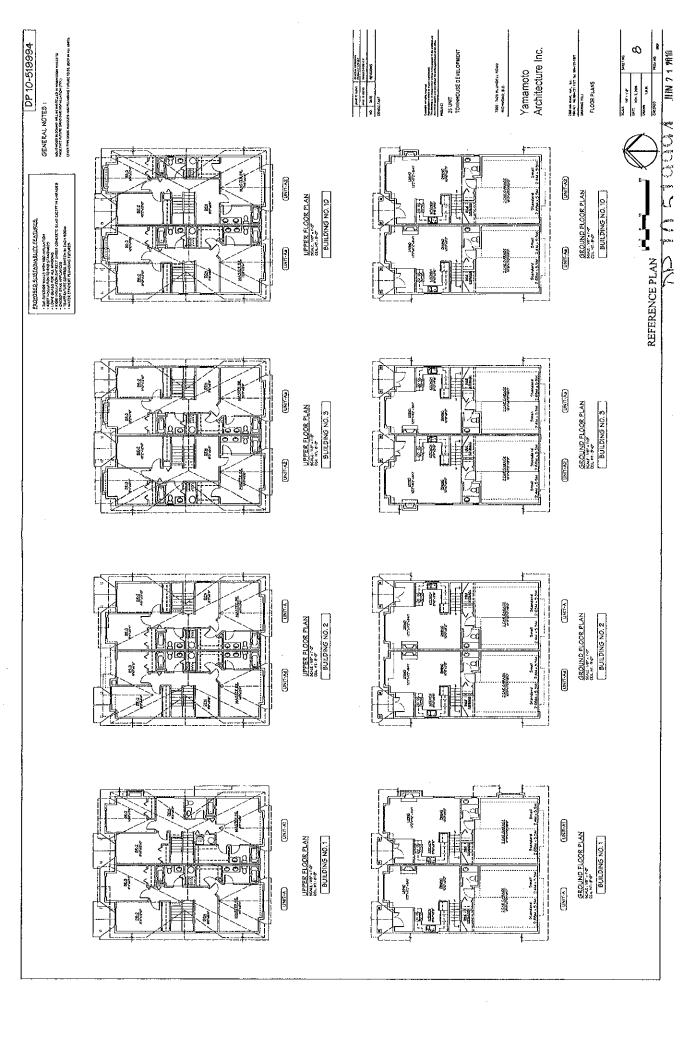












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