

City of Surrey  
**PLANNING & DEVELOPMENT REPORT**

File: 7908-0058-00

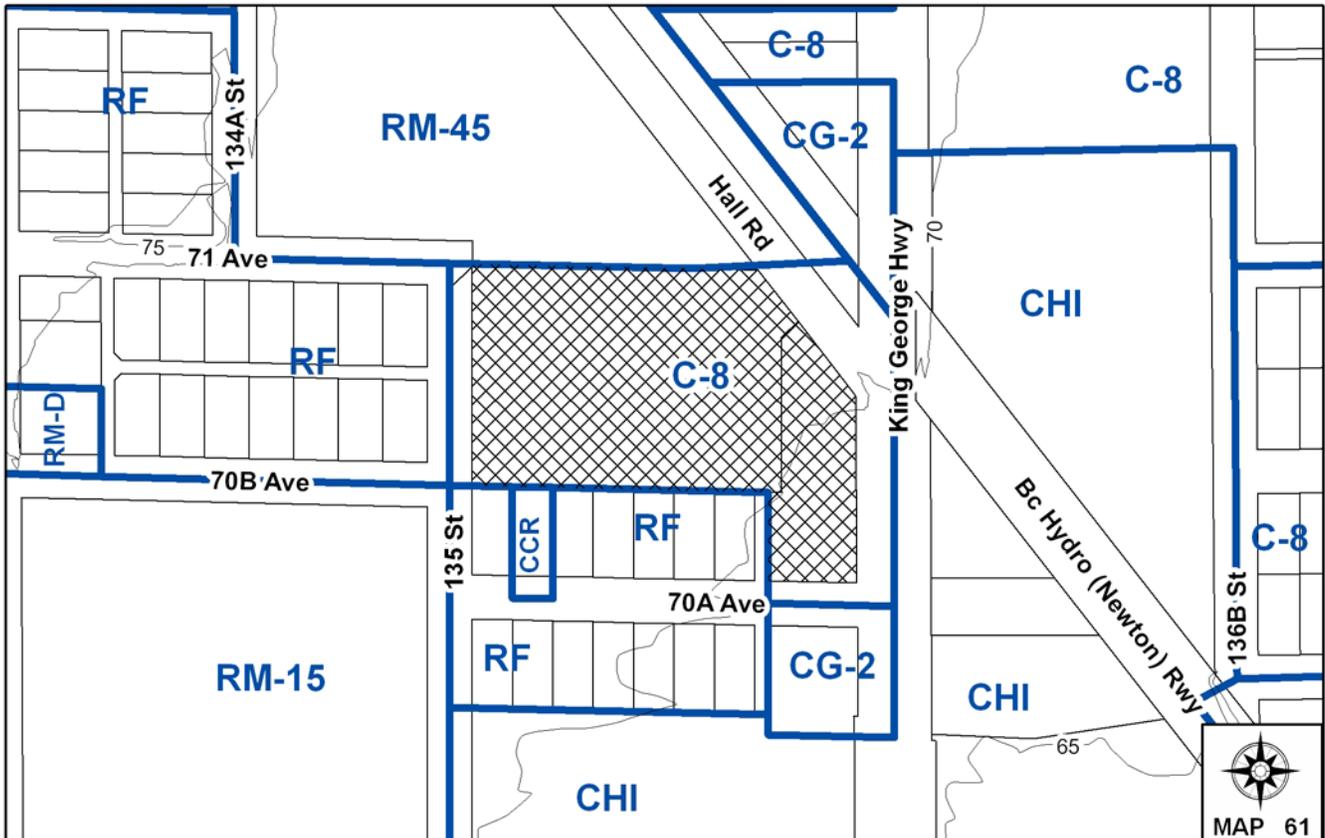
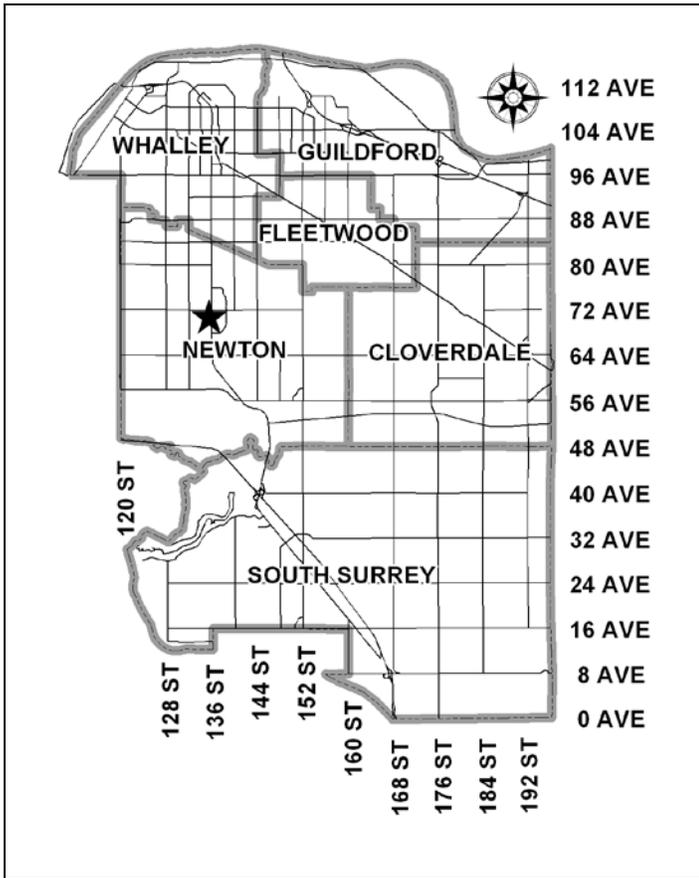
Planning Report Date: April 28, 2008

**PROPOSAL:**

- Rezoning from C-8 to CD (based on C-8)
- Development Permit
- Bingo Gaming Amendment

in order to permit the development of a Community Gaming Centre including Bingo and 150 slot machines and redevelopment of the existing commercial building.

**LOCATION:** 7093 King George Highway  
**OWNER:** Newton Square Properties Ltd.  
**ZONING:** C-8  
**OCP DESIGNATION:** Commercial  
**LAP DESIGNATION:** Commercial



### RECOMMENDATION SUMMARY

- Council refer the application back to staff to proceed to a detailed planning stage and bring forward a Rezoning By-law for Council consideration of a Community Gaming Centre (CGC), with a maximum of 150 slot machines, subject to the conditions discussed in this report.

### DEVIATION FROM PLANS, POLICIES OR REGULATIONS

- The proposed Community Gaming Centre (CGC) includes slot machine gaming, which is not a permitted use in Surrey, except within the Cloverdale Casino.

### RATIONALE OF RECOMMENDATION

- Council direction is requested to proceed to a detailed planning stage for this proposal, given that slot machines are not permitted at this location, and the applicant has indicated that slot machines are a necessary component of the Community Gaming Centre concept.
- ~~Council direction is requested to proceed to a detailed planning stage for this proposal, given that slot machines are not permitted at this location, and the applicant has indicated that~~
- The City Gaming Policy (No. 22) does not specifically address Community Gaming Centres (CGCs).
- The applicant has agreed to redevelop this prominent site at the entrance to the Newton Town Centre as part of CGC development, which will substantially help revitalize this part of Newton.
- There is a certain degree of public support for the redevelopment of the Newton Square to accommodate a new CGC.
- The Newton Bingo site currently provides substantial funding to non-profit organizations and the redevelopment of the Bingo gaming component in the CGC.
- The Surrey RCMP does not have any concerns regarding allowing a CGC at the subject location.
- The Corporation of Delta has no objection to upgrading the existing "Bingo Gaming" facility to a "Community Gaming Centre".

RECOMMENDATION

The Planning & Development Department recommends that:

1. Council refer the application back to staff to proceed to a detailed planning stage and bring forward a rezoning By-law for Council consideration of a Community Gaming Centre (CGC) with a maximum of 150 slot machines, subject to the conditions discussed in this report.

REFERRALS

- Engineering:** No preliminary engineering issues/concerns have been identified. Engineering comments will be provided should this project proceed to a detailed planning stage.
- Gaming Committee:** Opposed. The Gaming Committee reviewed the proposal for a Community Gaming Centre (CGC) at this location in 2006 and recommended denial as detailed in this report under the section "Gaming Committee Review".
- Surrey RCMP:** No concerns. However, the RCMP raised the issue of adequate parking and CPTED.
- Corporation of Delta:** Provincial licensing approval for a Bingo Gaming Amendment requires consultation with immediately adjacent local governments and first nations with 5 kilometres of the subject site, whom are required to respond in writing within 30 days of receipt of the notice. Staff sent a notice to the Corporation of Delta on March 10, 2008 and have received a letter with a resolution from the Council of the Corporation of Delta which states that "a letter be sent to the City of Surrey, Planning Department, advising that the Corporation of Delta has no objection to the existing "Bingo Gaming" facility to a "Community Gaming Centre" at 7093 King George Highway.

SITE CHARACTERISTICS

Existing Land Use: Commercial shopping centre with a commercial Bingo Hall, dental offices, restaurants, a thrift store and retail stores.

Adjacent Area:

| <b>Direction</b> | <b>Existing Use</b> | <b>OCP Designation</b> | <b>Existing Zone</b> |
|------------------|---------------------|------------------------|----------------------|
| North:           | Apartment.          | Commercial             | RM-45                |

| Direction                          | Existing Use                               | OCP Designation      | Existing Zone |
|------------------------------------|--|----------------------|---------------|
| East (Across King George Highway): | Vacant land and a commercial building.     | Commercial           | CHI           |
| South:                             | Single family homes and child care centre. | Commercial           | RF and CCR    |
| West (Across 135 Street):          | Single family homes.                       | Multiple Residential | RF            |

## DEVELOPMENT CONSIDERATIONS

### Background

- The subject site, designated Commercial in the OCP and the Newton Town Centre plan, is located at the southwest quarter of the intersection of King George Highway and 72 Avenue. It comprises of two properties under a single address (7093 King George Hwy). The site is zoned C-8, and contains the Newton Country Bingo Gaming Centre, dental offices, restaurants, a thrift store and other retail stores, operating in a single building, which straddles the two lots.
- The applicant proposes to upgrade the existing building, by removing the wing, which houses the Newton Country Bingo Centre, improving the façade of the remaining structure, and developing a new gaming facility building on the site that will accommodate a Community Gaming Centre (CGC). A CGC will include bingo (paper and electronic), slot machines, lottery games (such as 6/49), keno, food service (including a licensed restaurant) and live entertainment. The CGC Concept was developed by the Province to modernize Bingo gaming and diversify the gaming options to the public while maintaining the non-profit funding that Bingo supports.
- In accordance with the BC *Gaming Control Act* and *Gaming Control Regulations*, the inclusion of a CGC with slot machines is deemed a "substantial change" to the existing Bingo Gaming, therefore, Council approval with community input is required.
- Gaming facilities which include slot machine gaming is not a permitted use in any zone under the Surrey Zoning By-law unless it is specifically provided for in a zone.
- Staff is bringing forward this preliminary report for Council consideration to obtain direction on key elements fundamental to the proposed CGC, prior to proceeding to a detailed planning stage and consideration of By-law introduction.

### Community Gaming Centres (CGCs)

- Bingo Gaming, as is currently operated at the subject location, is a "traditional bingo", which includes paper and electronic bingo. The provider also sells accessories such as break-open, 6/49, BC/49 etc. It has operated at the current location since 1990.

- In 2002, the BC Lottery Corporation took over the operational responsibilities of Bingo Gaming and introduced the Community Gaming Centre (CGC) concept, a new approach to bingo, which maintains the traditional paper format bingo and electronic bingo as the marquee gaming component, and added a variety of gaming options including off-track horse race betting, keno, electronic slot machines, etc. A maximum of 150 slot machines are permitted under the CGC concept. The CGC could also include show rooms for live entertainment and dining areas. The CGC concept was developed to modernize bingo and enable bingo gaming to compete with other gaming facilities in the Province, thus supporting non-profit societies and charities.
- Currently there are 16 CGCs, with slot machines, approved province-wide. The number of slot machines ranges from 50 to 150. Three of those are in the Lower Mainland (City of Abbotsford with 125 slot machines, District of Mission with 75 slot machines and increased to 125 slot machines, and the Township of Langley, with 150 slot machines approved, but the facility is not yet open).

### "Substantial Change" to Gaming & Statutory Requirement of the City

#### *Consultation with Adjacent Local Governments and First Nations*

- The proposed inclusion of slot machines to Newton Square Bingo Country meets the definition in the Regulations of the BC *Gaming Control Act* and *Gaming Control Regulation* of a "substantial change" to the type or extent of lottery schemes being offered. As such, an approval process, which includes a consultation with neighbouring Local Governments or first Nations, and the seeking of community input, is required of the City.
- The City is required to send consultation notices in writing to immediately adjacent municipalities, regional districts and first nations informing them of the proposed substantial change to the gaming facility. Immediately adjacent is defined as within a five-kilometre radius of the subject property.
- The consultation process is completed only when all responses received are considered by the City prior to approval of the proposal. A copy of all consultation letters must be forwarded to British Columbia Lottery Corporation (BCLC).

#### *Community Input*

- Prior to giving approval to the proposal, the City must also show that it sought and considered public input by:
  - Giving adequate public notice which includes the particulars of the type (and extent if applicable) of gaming that is proposed to be introduced; and
  - Providing an opportunity for residents and representatives to provide comments, information and representations concerning the proposal either by one or more public hearings or public meetings, or by a referendum of the residents.

### *Formal Approval*

- The formal approval of the substantial change by the City is required to be in the form of a resolution or a letter on the official letterhead and delivered to both BCLC and the Gaming Policy and Enforcement Branch (GPEB) indicating support of the amendment.

### The City's Gaming Policy

- On January 25, 2001, Council established a Committee on gaming. One of the mandates of the committee was to develop a Gaming Policy to Council and a policy framework to govern the regulation, operation and expansion of any form of gaming in the City of Surrey. In July 2001, Council approved the Gaming Policy R-22, under resolution No. RES.R01-1742 (Appendix III).
- Under the Gaming Policy, any gaming facility that contains gaming tables and slot machines is deemed a casino. Each application for a casino will involve, as a minimum, a rezoning application for either a Comprehensive Development Zone or Special Casino Zone and a Development Permit application.
- The City Gaming Policy was developed prior to the development of the CGC concept by the Province, and does not address CGCs. Therefore the Gaming Policy does not provide specific guidance for the evaluation of a CGC. A detailed review of the Gaming Policy, as it relates to CGCs, may be necessary in light of this proposal. Overall, the subject proposal for a CGC can be considered on its merits.
- The applicant has indicated that Slot Machine Gaming is a vital component of the proposal to introduce a CGC and modernizing the bingo gaming component at the subject location. Without it, the British Columbia Lottery Corporation will not proceed with the development of a CGC at the subject location and the redevelopment of the Newton Square Shopping Centre will not occur.

### Gaming Committee Review

- On October 3, 2006, the Gaming Committee considered an inquiry from the Newton Bingo Centre operator to redevelop the Bingo Hall into a CGC, a primary focus of offering of bingo and lottery related games, 25 to 100 slot machines along with theme nights and food services. Specifically, the Newton CGC would have 50 slot machines.
- The following comments were provided in that meeting:
  - The original philosophy of the Gaming Policy was not to have many small casinos in the City, but rather limit casinos to a maximum of three larger locations;
  - An entertainment theatre would be part of the redevelopment of the Newton Bingo Centre (Newton Square);
  - The municipality receives 10% of the "net revenues" from the slot machines; estimated revenues are between \$100K and \$500K per year based on other CGCs in the province. The remaining revenues are split between: a facility development fund used by the operator to maintain and improve the facility; the operator; and general revenue to the

BCLC, transferred to the Province, from which grants to charitable organizations are made;

- The request is for 50 "penny" or "nickel" slot machines;
  - Both manual bingo and electronic bingo are currently offered at the Newton Bingo Centre;
  - The concept of CGCs was created for small communities that do not have the population to support a full casino;
  - This site is three blocks away from the site that Council said "no" to slot machines. To the north of this site is a high crime area. Suggest that this is not the best location for slot machines and also that installation of slot machines is contrary to the Gaming Policy; and
  - Bingo is a social activity and introducing slot machines may change the aspect of the game.
- The Committee resolved, following the discussion, that it would support the redevelopment of the Newton Bingo Centre with CGC amenities but without slot machines or other casino-type games of chance.

#### Slot Machines & Redevelopment of the Existing Newton Square Shopping Centre

##### *Slot Machines*

- The applicant indicated that CGC provides the developer with the economic justification to redevelop Bingo Country Hall and revitalize the existing commercial centre. The slot machine gaming up to a maximum of 150 slot machines in the CGC, is the economic driver to justify for the site's revitalization. Without the slot machines the redevelopment proposal cannot proceed.
- The current proposal indicates the CGC may contain 75-125 slot machines. This number is generally determined by market research on potential demand, and is limited by BCLC, to a maximum of 150.
- Staff raised the example of the District of Mission's approval of 75 machines (starting point) as a model to follow, and to limit the number of slot machines to 100.

- The applicant argued that the Mission numbers were based on a population of 34,500 and an investment of \$5 million on the facility, therefore, Surrey's population of approximately 500,000 and the investment that the owner is making in Newton, justifies the 150 slot machines. However, the applicant did suggest that the site should be rezoned to allow slot machines with a restrictive covenant limiting the number of slot machines to 100, to start with.
- To further understand the case of the number of slot machines, the applicant produced the following statistics on slot machine distribution in Canada:

| <u>Community</u> | <u>Slot Machines per 100 Adults</u> |
|------------------|-------------------------------------|
| Canada           | 3.8                                 |
| BC               | 2.3                                 |
| Surrey           | 1.75                                |

- Addition of between 100 to 150 slot machines to the new Community Gaming Centre in Newton, still keeps the number more than 50% below the Canadian average and 30% below the B.C. average.

### *Redevelopment*

- The level of the redevelopment of the existing Newton Square Shopping Centre, was also discuss by staff and the applicant. As mentioned earlier in this report, BCLC is responsible for operating Bingo Gaming. They do so through the services of an operator "Service Provider". The operator of the Newton Bingo Centre (Boardwalk Gaming & Entertainment Inc.), who owns the Newton Square Shopping Centre, under the subsidiary name Newton Square Properties Ltd.(the applicant), will be responsible for the redevelopment of the Newton Square Shopping Centre. Its agent has provided the following information.
  - With the proposed CGC, they have committed approximately \$25 million of new construction, and improvements to the site;
  - They indicated that, the redevelopment is best accomplished through demolition of the existing Bingo Centre, rehabilitation of part of the existing commercial structure, and adding a new building for the Bingo Centre. This approach reduces the environmental impact of unnecessary demolition and construction, and least disrupts the viable family-run businesses that operate at the centre and have supported the community for years;
  - As shown in Appendix II, the site has been laid out to accommodate the new uses planned for the site, including the new Bingo Centre is cited at the north edge of the shopping centre, closer to King George Highway. The parking area is broken up by trees in planting pockets throughout the site.
  - The new Bingo Centre is one storey building and approximately 2000 square metres (21,00 sq.ft.) in size. The building incorporates a West Coast design theme. The principal cladding materials are granite, exposed wood and glass on the public sides of the building and tilt-up concrete on the less public north side. The use of colour and reveals will tie into the rest of the complex. An integrated trellis system provides weather protection over the public walkway along the public sides of the building. The main entrance is treated with landscape features, which include a water feature, elegant

signage, trellis structure and public seating at the entrance. The same materials and treatment of the façade is used to upgrade the remaining building.

- The new Bingo facility and rehabilitated commercial centre will have a cohesive urban design, and will address access, design, parking and CPTED concerns of the existing centre, and finally help attract new clientele and tenants. These improvements will positively benefit the economic development of the Newton neighbourhood; and
  - The owner has agreed to voluntarily provide a community office space in the new Bingo Centre, as an amenity contribution.
- The design scheme discussed above has not been reviewed by staff or the Advisory Design Panel (ADP).

### Public Consultation

#### *Public Meeting*

- Public input is required, where there is a proposal for a "substantial change" to a Bingo Gaming Centre. The subject proposal is considered "substantial".
- A Public Information Meeting for the project was held on January 17, 2008, prior to the application being made to the City. The consultant for the project (Brook Development Planning Inc.) sent out 7,780 flyers to residents and businesses within 1 kilometre (0.6 mile) radius of the subject site. Newspaper ads were also included on the January 8, 11, and 15, 2008 editions of the Surrey Now news paper, and placed posters and flyers at the Newton Square Shopping Centre and the existing Bingo Hall. Letters were sent to City staff and other stakeholders, inviting them to attend the meeting.
- The meeting was conducted in an Open House format, including display boards outlining the proposed site redevelopment and CGC.
- 208 attendees signed the sign-in sheet. 150 of them were from Surrey. Representatives of Boardwalk (the gaming service provider), the BC Lottery Corporation, a City staff member and a Councillor also attended the meeting.
- The comments from the community were categorized into six (6) categories, namely: Proposed Plans and revitalization of the site(104 comments), form and character of the development proposal(17 comments), safety and security(17 comments), parking and traffic(16 comments), slot machine and gaming(20 comments), and support for funding from bingo(18 comments).
- The report on the public information meeting, summarizes the comments as show below:

| <b>Number of responses</b> | <b>Comment</b>                         | <b>% of respondents</b> |
|----------------------------|--|-------------------------|
| 104                        | Support the general idea               | 78%                     |
| 15                         | Support but with comments and concerns | 11.4%                   |
| 6                          | No clear position                      | 4.5%                    |
| 7                          | Opposed                                | 5.3%                    |

### *Applicant's Community Survey*

- The consultant of the project also conducted a public survey, involving telephone interviews conducted by the market research firm, Mustel Group, with 300 residents living in the community of Newton between March 24, 2008 and March 31, 2008. The survey reached residents who are largely represented by those aged 25 to 54 years of age, with a mix of household types, mostly comprising young or old singles and new or established families.
- The majority of residents have lived in the area for at least eight or more years and are employed outside the home.
- The research concluded that, 37% of those polled had played slots in the last year, while only 13% played bingo.
- Of those polled, 82% were in support of the redevelopment of the Newton Square Mall.
- Initially, the proposed redevelopment and revitalization of Bingo Country and Newton Square Mall was received positively by half of all residents surveyed.
- Once they were given additional details of what development of a "Community Gaming Centre" meant, support for the proposal increased to almost two-thirds of all residents (64% in favour, 29% not in favour, 8% don't know).
- The residents responded most positively to the promise of enhanced safety and security and the financial benefit it will bring to local charities and community organizations.
- Of a lesser impact, though still important to residents, are the improved physical features the development will bring, economic contributions to the City and an overall welcoming of redeveloping the Newton Square Mall.
- In summary, residents expressed a desire to see the site revitalized, acknowledging the potential financial benefit to the community and voicing a need for another entertainment option for the area.

### Evaluation

The following issues and considerations support the proposal for a CGC at this location:

#### *Pros*

- Community Gaming Centres (CGCs), are not directly addressed in the City's Gaming Policy, and provide a means to modernize gaming centres.
- The applicant has agreed to redevelop the Newton square shopping centre, including major improvement of the entire site including significant upgrade of the portion of the existing building that will remain, thus revitalizing the site and the Newton area. The improvements made to the site will address existing CPTED issues on the site.

- There is generally public support for the improvement of the Newton square bingo into a new CGC, which is demonstrated by letters of support and positive comments at the Public Information Meeting.
- The Newton Bingo Gaming provides direct and stable financial support, to non-profit organizations, which number approximately 293, and include social organizations, school clubs, community seniors organizations, meals-on-wheels etc.
- The Surrey RCMP does not have any concerns regarding allowing a CGC at the subject location.

#### *Cons*

On the other hand, the following issues and concerns have been identified with this proposal:

- Gaming Committee recommended denial of slots in this site in 2006.
- Some public concerns have been raised about the social impact of these facilities on the quality of life of the residents and the over-saturation of such uses in the Newton area.
- Slot machine gaming may alter the social nature of the existing gaming.

#### PRE-NOTIFICATION

- The pre-notification letters were sent out on March 10, 2008, and staff did not receive any calls or letters against the proposed development and inclusion of slot machines into the existing Bingo Gaming. However, staff received twelve (12) letters of support for the proposed development, mainly from community organizations that benefit from charitable dollars from the existing Bingo Gaming.

#### CONCLUSION

On this basis, staff can support the application proceeding to a detailed planning stage, subject to the conditions noted above and therefore, recommend that the application be referred back to staff to bring forward a rezoning By-law for consideration of a Community Gaming Centre, that includes up to a maximum of ~~rehabilitating~~ 150 slot machines as a permitted use on the subject site, subject to the applicant redeveloping the entire site, and to proceed to Public Hearing on this basis.

#### INFORMATION ATTACHED TO THIS REPORT

The following information is attached to this Report:

- |               |   |
|---------------|---|
| Appendix I.   | Lot Owners, Action Summary and Project Data Sheets and Survey Plan      |
| Appendix II.  | Proposed Site Plan, Building Elevations Landscape Plans and Perspective |
| Appendix III. | Gaming Policy   |

INFORMATION AVAILABLE ON FILE

- Complete Set of Architectural and Landscape Plans prepared by Chris Dikeakos Architects Inc. and Durante Kreuk Ltd., respectively, dated February 28, 2008.

Jean Lamontagne  
General Manager  
Planning and Development

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Information for City Clerk

Legal Description and Owners of all lots that form part of the application:

1. (a) Agent:      Name:                      Gary Pooni, Brook & Associates Inc.  
                         Address:                      410 - 535 Thurlow Street  
    Vancouver, BC  
    V6E 3L2  
                         Tel:                              604-731-9053

2.      Properties involved in the Application

- (a)      Civic Address:              7093 King George Highway
- (b)      Civic Address:              7093 King George Highway  
            Owner:                          Newton Square Properties Ltd., Inc. No. 653099  
            PID:                              001-540-289  
            Lot 56 Section 17 Township 2 New Westminster District Plan 58570
- (b)      Civic Address:              7093 King George Highway  
            Owner:                          Newton Square Properties Ltd., Inc. No. 653099  
            PID:                              001-540-246  
            Lot 52 Section 17 Township 2 New Westminster District Plan 55458

3.      Summary of Actions for City Clerk's Office

## DEVELOPMENT DATA SHEET

**Proposed Zoning: CD**

| Required Development Data                          | Minimum Required /<br>Maximum Allowed | Proposed              |
|--|---------------------------------------|-----------------------|
| <b>LOT AREA*</b> (in square metres)                |                                       |                       |
| Gross Total  |                                       |                       |
| Road Widening area                                 |                                       |                       |
| Undevelopable area                                 |                                       | 17,863 m <sup>2</sup> |
| Net Total  |                                       |                       |
|  |                                       |                       |
| <b>LOT COVERAGE</b> (in % of net lot area)         |                                       |                       |
| Buildings & Structures                             | 50%                                   | 32%                   |
| Paved & Hard Surfaced Areas                        | n/a                                   | 63%                   |
| Total Site Coverage                                | n/a                                   | 95%                   |
|  |                                       |                       |
| <b>SETBACKS</b> ( in metres to proposed structure) |                                       |                       |
| Front  | 7.5 m                                 | 10.1 m                |
| Rear   | 7.5 m                                 | 54.4 m                |
| Side #1 (North)                                    | 7.5 m                                 | 6.4 m                 |
| Side #2 (South)                                    | 7.5 m                                 | 63.7 m                |
|  |                                       |                       |
| <b>BUILDING HEIGHT</b> (in metres/storeys)         |                                       |                       |
| Principal  | 12 m                                  | 10.36 m               |
| Accessory  | 4.5 m                                 | n/a                   |
|  |                                       |                       |
| <b>NUMBER OF RESIDENTIAL UNITS</b>                 |                                       |                       |
| Bachelor   |                                       |                       |
| One Bed  |                                       |                       |
| Two Bedroom  |                                       |                       |
| Three Bedroom +                                    |                                       |                       |
| Total  |                                       |                       |
|  |                                       |                       |
| <b>FLOOR AREA: Residential</b>                     |                                       |                       |
|  |                                       |                       |
| <b>FLOOR AREA: Commercial</b>                      |                                       |                       |
| Retail   | n/a                                   |                       |
| Office   | n/a                                   |                       |
| Total  | 14,920.4 m <sup>2</sup>               | 4,956 m <sup>2</sup>  |
|  |                                       |                       |
| <b>FLOOR AREA: Industrial</b>                      |                                       |                       |
|  |                                       |                       |
| <b>FLOOR AREA: Institutional</b>                   |                                       |                       |
|  |                                       |                       |
| <b>TOTAL BUILDING FLOOR AREA</b>                   | 14,920.4 m <sup>2</sup>               | 4,956 m <sup>2</sup>  |

*\* If the development site consists of more than one lot, lot dimensions pertain to the entire site.*

## Development Data Sheet cont'd

| Required Development Data                                     | Minimum Required /<br>Maximum Allowed | Proposed |
|---|---------------------------------------|----------|
| DENSITY   |                                       |          |
| # of units/ha /# units/acre (gross)                           |                                       |          |
| # of units/ha /# units/acre (net)                             |                                       |          |
| FAR (gross)   |                                       |          |
| FAR (net)   | 0.8                                   | 0.28     |
|   |                                       |          |
| AMENITY SPACE (area in square metres)                         |                                       |          |
| Indoor  |                                       |          |
| Outdoor   |                                       |          |
|   |                                       |          |
| PARKING (number of stalls)                                    |                                       |          |
| Commercial  |                                       |          |
| Industrial  |                                       |          |
|   |                                       |          |
| Residential Bachelor + 1 Bedroom                              |                                       |          |
| 2-Bed   |                                       |          |
| 3-Bed   |                                       |          |
| Residential Visitors  |                                       |          |
|   |                                       |          |
| Institutional   |                                       |          |
|   |                                       |          |
| Total Number of Parking Spaces                                | 210                                   | 251      |
|   |                                       |          |
| Number of disabled stalls                                     |                                       |          |
| Number of small cars  |                                       |          |
| Tandem Parking Spaces: Number / % of<br>Total Number of Units |                                       |          |
| Size of Tandem Parking Spaces<br>width/length                 |                                       |          |

|               |    |                                 |     |
|---------------|----|---------------------------------|-----|
| Heritage Site | NO | Tree Survey/Assessment Provided | YES |
|---------------|----|---------------------------------|-----|