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File No. P-2450

TO:	<p>THE COUNCIL OF THE CORPORATION OF THE CITY OF LONDON</p> <p>AS THE APPROVING AUTHORITY UNDER THE <i>EXPROPRIATIONS ACT</i></p> <p>MEETING ON MAY 30, 2017</p>
FROM:	<p>KELLY SCHERR MANAGING DIRECTOR ENVIRONMENTAL & ENGINEERING SERVICES AND CITY ENGINEER</p>
SUBJECT:	<p>EXPROPRIATION OF LANDS WESTERN ROAD WIDENING AND IMPROVEMENTS PROJECT TS1489-1</p>

RECOMMENDATION

That, on the recommendation of the Managing Director, Environmental and Engineering Services and City Engineer, on the advice of the Manager of Realty Services, with the review and concurrence of the Director, Roads and Transportation, with respect to the expropriation of lands for the a project known as the Western Road Widening and Improvements Project between Oxford Street West and Platt’s Lane, and that the following actions be taken in connection therewith:

- a) the Council of The Corporation of the City of London as Approving Authority pursuant to the *Expropriations Act, R.S.O. 1990, c. E.26*, as amended, **HEREBY APPROVES** the proposed expropriation of land, as described in Appendix “A” attached hereto, in the City of London, County of Middlesex, it being noted that the reasons for making this decision are as follows:
 - i) the subject lands are required by The Corporation of the City of London for the Western Road Widening and Improvements Project;
 - ii) the design of the project will address the current and future transportation demands along the corridor;
 - iii) the design is in accordance with the Municipal Class Environmental Assessment Study Recommendations for the Western Road Widening and Improvements Project accepted by Council on October 13, 2015; and
- b) that a certificate of approval **BE ISSUED** by the City Clerk on behalf of the Approving Authority in the prescribed form.
- c) it being noted that request for two Hearing of Necessities in relation to Parts 6 and 13, Plan 33R-19561 were received and hearings were conducted on April 7 & 10, 2017, the findings and opinion of the Inquiry Officer are attached hereto as Appendixes “B” & “C”.

PREVIOUS REPORTS PERTINENT TO THIS MATTER
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- Civic Works Committee – June 19, 2012 – London 2030 Transportation Master Plan
- Civic Works Committee - July 22, 2013 – Reprioritization of Growth Management Implementation Strategy (GMIS) Transportation Projects.
- Civic Works Committee – January 6, 2014 – Appointment of AECOM Canada Limited, Western / Wharncliffe Road North Widening from Platt’s Lane to Oxford Street, Schedule ‘C’ Environmental Assessment.

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- Civic Works Committee – October 22, 2015 – Western/Wharnccliffe Road North Widening Environmental Study Report.
- The Council of The Corporation of the City of London as The Approving Authority under the Expropriation Act – November 22, 2016

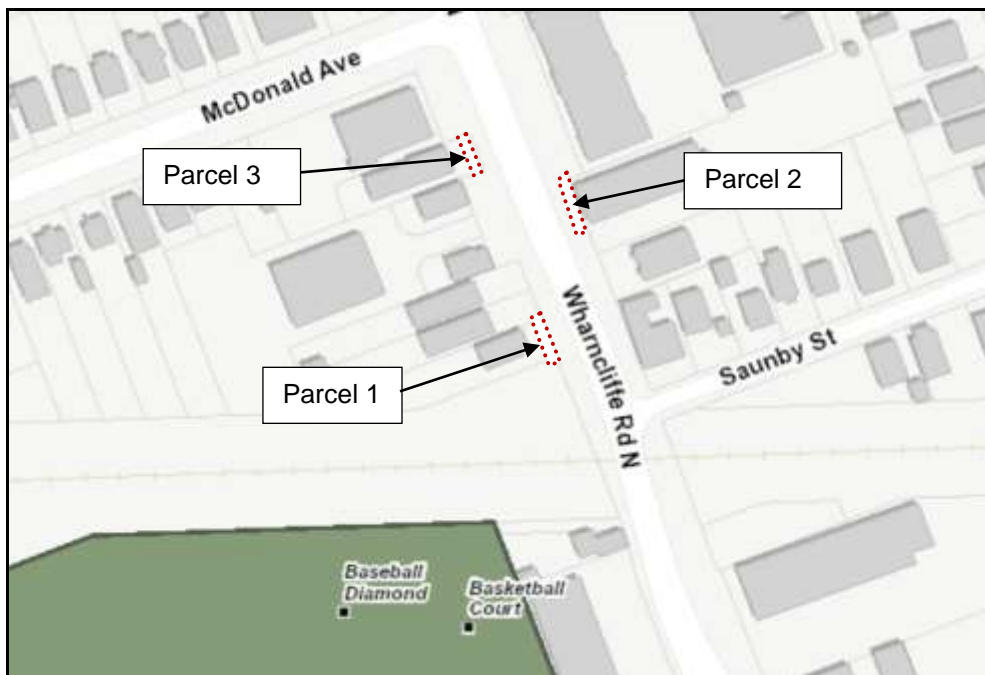
BACKGROUND

Council approved and accepted the Schedule “C” Municipal Class Environmental Assessment and Western Road Improvements Environmental Study Report. The Environmental Study Report was subsequently placed on public record for a thirty (30) day review period during which no Part 2 Orders were received. The project environmental assessment is thereby complete. The report study area included properties fronting onto the road allowance throughout the length of the corridor from Oxford Street West to Platt’s Lane. The entire project is to follow a phased approach. The first phase of the project in 2017 involves the construction of a rail diversion. The second phase involves land acquisitions within the corridor along with easements associated for the relocation of utilities.

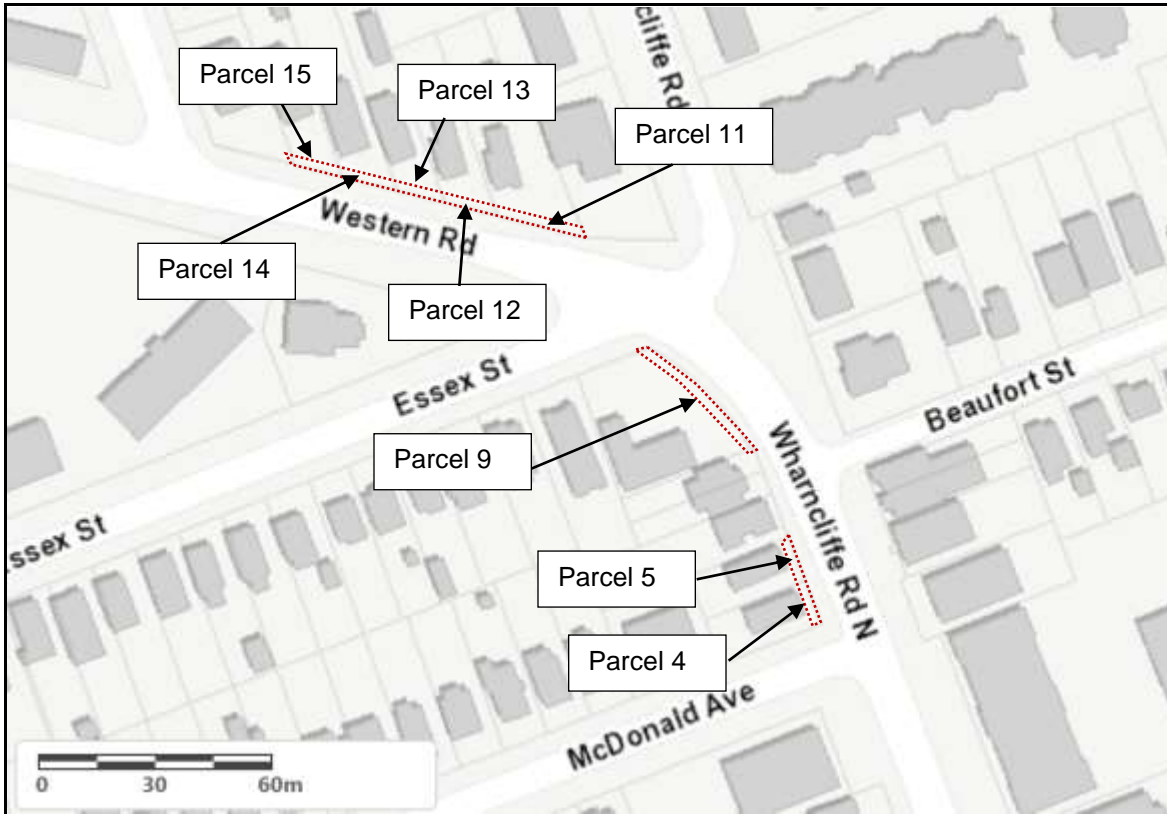
The subject properties are required in support of the Western Road EA. More specifically, the properties are required for the road widening portion of the project in 2018, as shown in the Environmental Study Report. These properties will accommodate the proposed works and improvements along this section of the project.

Negotiations commenced in the summer of 2016 with written offers provided and accepted by several owners. Of the original list of 22 properties to be expropriated Realty Services through amicable agreements has been successful in reducing that outstanding number of properties to be expropriated to 11. Furthermore, the City has signed offers on 4 properties (Parcels 2, 3, 4 and 5) which are due to close in mid-June. However, the balance of 4 owners which own the remaining 7 properties have rejected the offers presented. Realty Services will continue negotiations with these property owners in an effort to amicably acquire the balance of properties by a settlement agreement.

Hearing of Necessity inquiries were requested from two owners. The properties were located at 934 Western Road (Parcel 15) and 332 Wharnccliffe Road N. (Parcel 9). The Hearing of Necessity inquiries were held on April 7th & 10th, 2017, with Mr. Geoff Belch acting as counsel for the City and Mr. Ted Koza presenting evidence on behalf of the City. After hearing all pertinent evidence Mr. Colbourne, the Inquiry Officer concluded that both owners were not unduly prejudiced by the proposed expropriations, and that the proposed takings are regarded as fair, sound and reasonably necessary in the achievement of the objectives of the Expropriation Authority.



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Appendixes “B” & “C” - see attached for the findings and opinions of the inquiry officer.

Therefore, it is necessary to continue with the expropriation procedures for these properties in order for the project to proceed.

Anticipated Construction Timeline

Property requirements to be secured for 2018 construction.

SUBMITTED BY:	REVIEWED AND CONCURRED BY:
BILL WARNER MANAGER OF REALTY SERVICES	EDWARD SOLDO DIRECTOR ROADS AND TRANSPORTATION
RECOMMENDED BY:	
KELLY SCHERR, P.Eng., MBA, FEC MANAGING DIRECTOR, ENVIRONMENTAL AND ENGINEERING SERVICES AND CITY ENGINEER	

May 9, 2017
Attach.

Doc. P-2450

cc: Gary Irwin, Division Manager & Chief Surveyor
Doug MacRae, Division Manager
David G. Munteer, Solicitor II

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APPENDIX "A"

DESCRIPTION OF LANDS TO BE EXPROPRIATED FOR WESTERN ROAD WIDENING AND IMPROVEMENTS PROJECT - BETWEEN OXFORD STREET WEST AND PLATTS LANE

The following lands are required in fee simple:

- Parcel 1. Part of Lot 21, Registrar's Compiled Plan No. 450(W), in the City of London, County of Middlesex designated as Part 6 on Reference Plan 33R-19520 being part of PIN 08248-0077(LT).
- Parcel 2. Part of Lots 4 & 5, East of Wharncliffe Road, Registered Plan No. 5(W), Part of Wharncliffe Road North (Closed by By-Law S-470-26, Registered as Inst. No. LC91666) in the City of London, County of Middlesex designated as Part 15 on Reference Plan 33R-19520 being part of PIN 08247-0038(LT).
- Parcel 3. Part of Lot 17, Registrar's Compiled Plan 450(W), in the City of London, County of Middlesex designated as Part 1 on Reference Plan 33R-19520 being part of PIN 08248-0073(LT).
- Parcel 4. Part of Lot 1, Registrar's Compiled Plan 434(W), in the City of London, County of Middlesex designated as Part 1 on Reference Plan 33R-19516 being part of PIN 08248-0172(LT).
- Parcel 5. Part of Lot 2, Registrar's Compiled Plan 434(W), in the City of London, County of Middlesex designated as Part 2 on Reference Plan 33R-19516 being part of PIN 08248-0174(LT).
- Parcel 9. Part of Lots 5, 6 & 7, Registrar's Compiled Plan 434(W), in the City of London, County of Middlesex designated as Part 6 on Reference Plan 33R-19516 being part of PIN 08248-0053(LT).
- Parcel 11. Part of Park Lot 1, North of Wharncliffe Highway (Geographic Township of London), in the City of London, County of Middlesex designated as Part 9 on Reference Plan 33R-19516 being part of PIN 08078-0067(LT).
- Parcel 12. Part of Park Lot 1, North of Wharncliffe Highway (Geographic Township of London), in the City of London, County of Middlesex designated as Part 10 on Reference Plan 33R-19516 being part of PIN 08078-0066(LT).
- Parcel 13. Part of Park Lot 1, North of Wharncliffe Highway (Geographic Township of London), in the City of London, County of Middlesex designated as Part 11 on Reference Plan 33R-19516 being part of PIN 08078-0082(LT).
- Parcel 14. Part of Park Lot 1, North of Wharncliffe Highway (Geographic Township of London), in the City of London, County of Middlesex designated as Part 12 on Reference Plan 33R-19516 being part of PIN 08078-0063(LT).
- Parcel 15. Part of Park Lot 1, North of Wharncliffe Highway (Geographic Township of London), in the City of London, County of Middlesex designated as Part 13 on Reference Plan 33R-19516 being part of PIN 08078-0106(LT).

* Reached amicable agreements on Parcels 6, 7, 8, 10 & 16 to 22

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APPENDIX "B"

IN THE MATTER OF THE EXPROPRIATIONS ACT

IN THE MATTER OF an application by The City of London for approval to expropriate Parcel 15: Part of Park Lot 1, North of Wharncliffe Highway (Geographic Township of London), County of Middlesex designated as Part 13 on Reference Plan 33R-19516 being part of PIN 08078-0106 (LT).

Date of Hearing April 10th 2017

Appearances:

G. Belch	for	City of London
A Patton	for	Sarhan Abu-Kwiek

REPORT

This hearing was held pursuant to Section 7 of the Expropriations Act, R.S.O. 1990, C.E. 26 (as amended), to determine whether the taking by the City of London of Part of Park Lot 1 North of Wharncliffe Highway (Geographic Township of London), County of Middlesex designated as Part 13 on Reference Plan 33R-19516, being part of PIN 08078-0106 (LT) is fair, sound and reasonably necessary in the achievement of the objectives of the expropriating authority.

The Objective:

The stated Objective of the Authority is to expropriate lands for the expansion of Western Road/Wharncliffe Road North from a two land arterial roadway to a four land arterial roadway from Oxford Street West to Platts Lane.

The Project:

The improvement of Western Road and Wharncliffe Road between Oxford Street and Platt's Lane involves the construction of two additional (lanes with turning lanes at intersections), improvements to intersections, sidewalks, bicycle lanes, bus laybys and other necessary works such as utility relocation, improvement of storm water management and drainage and upgrading of water and waste water mains.

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The Project is divided into two with Phase One, being between Oxford Road up to and including the CP rail subway subway/bridge diversion underpass and Saunby Street. That has final design and those works are to be undertaken this year. Phase 2 is from the Railway subway to Platt's Lane and it involves the subject property, 332 Wharncliffe Road North, is located at the confluence of Wharncliffe Road, Western Road and Essex Street. The fee simple taking is an even depth and is in total 00.59 acres of the frontage. The property is presently a student rental property.

The City's Evidence:

The evidence was given by Ted Koza, the City's Environmental engineer. He outlined that the City retained AECOM to undertake a Class EA to identify an implementation strategy for the necessary transportation infrastructure requirements along Western /Wharncliffe Road. This included all public and agency consultation, an evaluation of solutions, assessment of potential Impacts, and the identification of measures to mitigate any adverse impacts. The EA was predicated on three key policies as outlined under the heading, Problems and Opportunities, starting at Page 1 at Section 1.1 of the ESR: the City of London's Official Plan, London Plan (and the City's new Official Plan, (not yet approved), The London 2030 Transportation Master Plan (2013) (TMP), the Shift Rapid Transit Class EA (underway), the 2007 Bicycle Master Plan, and the 2015 draft of the Beaufort/Gunn/Saunby/Essex Street Neighbourhood Secondary Plan. He briefly outlined the contribution each played in the study. The study of the areas of natural sciences, archaeology and geotechnical and engineering fields were covered by AECOM sub contractors. Two PIC's were held to outline the overall preliminary engineering design and design alternatives for various components of the undertaking.

The EA considered all reasonable alternatives to the undertaking to ensure that there is adequate justification to proceed with the improvements and that the need for the project is clearly demonstrated. The alternative planning solutions included: construction staging; widening alternatives; CPR subway; intersection designs; access control; noise attenuation; stormwater management and drainage; natural environment; utilities; and services improvement to existing infrastructure.

In addition to area drainage deficiencies, the need is described in the Study is as follows: "Traffic volumes along Western Road currently exceed the planned capacity of this two lane arterial road. The continued growth of the City of London as provided through existing Official Plan policy, zoning and planned and approved developments, will result in growth to the existing travel demands along this corridor and the City's transportation systems as a whole. This growth cannot be accommodated by the existing system".

. Of the various designs considered for the area the preferred has the least overall impact on the existing land owners, is the minimum necessary for the project, and can be implemented in a manner consistent with engineering constraints and at a reasonable cost. The subject lands were selected through the Class EA and a comparison of operational concerns, safety considerations and impacts on adjacent properties.

The project recommended under the ESR received clearance on November 25, 2015.

Mr. Patton's queries about the depth of the taking and access were responded to as follows by Mr. Koza:

The taking of frontage on the property to the north west (corner of Cedar Avenue), which is about double the taking on the subject, was obtained by **dedication** in the redevelopment of that property.

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The Official Plan planned width for the ultimate arterial in this location is more than the present taking, but the proposed taking represents all of the property necessary for this project, and it is uniform for all properties in the area. The improvements contemplated have been in the TMP for some time. Any access damage to the property would be repaired/replaced by the authority. There would not be any median in the road to prevent turning movements either north or south from the subject property.

Findings and Opinion:

Mr. Patton argued that in his opinion as a frequent traveller in the area, the widening was not needed except for the railway underpass improvements. He also argued that the taking should await redevelopments of his client's property.

As to the suggestion that the widening await redevelopment of the subject property, no rationale was provided. It is perhaps obvious that an additional taking would take place at any stage of redevelopment of the subject property, as it was on the adjacent property to the north. The evidence supports that this is the minimal taking needed for the project proposed

The evidence of Mr. Koza outlined the basis on which the project was studied in the EA and his evidence is contrary to Mr. Patton's view of the need. Mr. Koza states and I am satisfied that there is a need based on current traffic, and this will be exacerbated by future development and redevelopment as contemplated in the Official Plan.

Conclusion:

There is essentially no opposition to the need, except perhaps an issue of timing, which was not supported. I am satisfied that the taking is fair, sound and reasonably necessary in the achievement of the objectives of the expropriating authority.

April 25, 2017

D.S.Colbourne
Inquiry Officer

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Appendix A

WITNESS:

T. Koza P.Eng. (A) - Environmental Services Engineer – City of London

EXHIBITS:

- P-1 Affidavit of Title
- P-2 Request for Hearing of Necessity
- P-3 Property Drawings
- P-4 C.V. T. Koza
- P-5A Koza'a notes
- P-5B Acknowledgement of Experts duty
- P-6 Notice of Grounds
- P-7 Area Map
- P-8 Subject Property
- P-9 EA Flash Drive
- P-10 Notice of Study
- P-11 Council Minutes undertaking the works
- P-12 Pavement Markings
- P-13 OP excerpts
- P-14 Z1 by-law excerpts

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APPENDIX "C"

IN THE MATTER OF THE EXPROPRIATIONS ACT

IN THE MATTER OF an application by The City of London for approval to expropriate Parcel 9, Part of Lots 5,6&7, registrar’s Compiled Plan 434(W) in the City of London, County of Middlesex designated as Part 6 on Reference Plan33R-19516 being part of PIN 08248-0053 (LT).

Date of Hearing: April 7th,2017

Appearances:

G. Belch	for	City of London
J. Doherty	for	Thomas Bujouves

REPORT

The hearing was held pursuant to Section 7 of the Expropriations Act, R.S.O. 1990, C.E. 26 (as amended) to determine whether the taking by the City of London of Parcel 9: Part of Lots 5,6& 7, Registrar’s Compiled Plan 434W, in the City of London, County of Middlesex designated as Part 6 on Reference Plan 33R-19516 being part of PIN 08248-0053 (LT), is fair, sound and reasonably necessary in the achievement of the Objectives of the expropriating authority.

The Objective:

The stated Objective of the Authority is to expropriate lands for the expansion of Western Road/Wharncliffe Road North from a two land arterial roadway to a four land arterial roadway from Oxford Street West to Platts Lane.

The Project:

The improvement of Western Road and Wharncliffe Road between Oxford Street and Platt’s Lane involves the construction of two additional lanes, with turning lanes at intersections, improvements to intersections, sidewalks, bicycle lanes, bus laybys and other necessary works such as utility relocation, improvement of storm water management and drainage and upgrading of water and waste water mains.

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The Project is divided into two with Phase One, being between Oxford Road up to and including the CP rail subway subway/bridge diversion underpass and Saunby Street. That has final design and those works are to be undertaken this year. Phase 2 is from the Railway subway to Platt's Lane and it involves the subject property, 934 Western Road located just north west of the confluence of Wharncliffe Road, Western Road and Essex Street. The fee simple taking is an even depth and is in total 00.59 acres of the frontage. The property is presently a student rental property.

THE CITY'S EVIDENCE

The evidence was that given by Ted Koza, the City's Environmental engineer. He outlined that the City retained AECOM to undertake a Class EA to identify an implementation strategy for the necessary transportation infrastructure requirements along Western /Wharncliffe Roads. This included all public and agency consultation, an evaluation of solutions, assessment of potential Impacts, and the identification of measures to mitigate any adverse impacts. The EA was predicated on three key policies as outlined under the heading, Problems and Opportunities, starting at Page 1 at Section 1.1 of the ESR: the City of London's Official Plan, London Plan (and the City's new Official Plan, (not yet approved), The London 2030 Transportation Master Plan (2013) (TMP), the Shift Rapid Transit Class EA (underway), the 2007 Bicycle Master Plan, and the 2015 draft of the Beaufort/Gunn/Saunby/Essex Street Neighbourhood Secondary Plan. He briefly outlined the contribution each played in the study. The study of the areas of natural sciences, archaeology and geotechnical and engineering fields were covered by AECOM sub contractors. Two PIC's were held to outline the overall preliminary engineering design and design alternatives for various components of the undertaking.

The EA considered all reasonable alternatives to the undertaking to ensure that there is adequate justification to proceed with the improvements and that the need for the project is clearly demonstrated. The alternative planning solutions included: construction staging; widening alternatives; CPR subway; intersection designs; access control; noise attenuation; stormwater management and drainage; natural environment; utilities; and services improvement to existing infrastructure.

In addition to area drainage deficiencies, the need is described in the Study as follows: " Traffic volumes along Western Road currently exceed the planned capacity of this two lane arterial road. The continued growth of the City of London as provided through existing Official Plan policy, zoning and planned and approved developments, will result in growth to the existing travel demands along this corridor and the City's transportation systems as a whole. This growth cannot be accommodated by the existing system".

Of the various designs considered for the area the preferred has the least overall impact on the existing land owners, is the minimum necessary for the project, and can be implemented in a manner consistent with engineering constraints and at a reasonable cost. The subject lands were selected through the Class EA and a comparison of operational concerns, safety considerations and impacts on adjacent properties.

The City's evidence was unchallenged with respect to the need for the improvements. The issue deliberated was the extent of the taking of the subject property. The owner wishes the entire property taken, since what remains after the proposed taking in his view renders the property functionally and economically unviable. To support this Mr. Doherty called two witnesses, a planner Carol Weibe, and an engineer Carrie Curtis.

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The property is located at south west corner of Essex Street and Wharncliffe Road. It is on a curve as Wharncliffe Road transitions into Western Road. It is occupied by a take out restaurant and convenience commercial contained within a 1storey building. In terms of zoning the property meets the zoning requirements for 17 parking spaces, although as it functions there are fewer marked out on the property. Currently there is access from Wharncliffe on the south and off Exxex Street on the north. This allows for reasonable traffic movement on the property and also accommodates the garbage bins along the south lot line and access to them.

The taking follows the curve with its south depth of 3.503m and on the north it is 6.371m. In total it is 0.01651 hectares. In the improvements the signalized pedestrian crossing located with the traffic signal at the corner of Essex and Wharncliffe, will be moved south to Beaufort Street.

On site the taking eliminates the planning provision of 9 spaces, which would complicate on site traffic flow and the positioning of garbage bins. The proposed middle turning lanes at Beaufort and Essex would appear to potentially create some conflict.

Ms. Weibe presents her conclusion on Pg. 25 of her report Exhibit 20. In order to limit the findings to true planning conclusions I have extracted in part from her conclusions, hopefully, but not perfectly to eliminate what appear to be matters more related to compensation.

“ Her Summation:

It is my opinion that the scheme and the reconfiguration of Wharncliffe Road North will generate significant impacts on the accessibility and functionality of the commercial plaza relative to pre-taking conditions. It is also my opinion that these likely impacts will be significant in nature, and will compromise the overall viability of the property to fulfill its planned function as a convenience commercial use”.

“In order to fully assess the impacts of the taking, and absent a complete redevelopment of the subject lands, significant modifications would be required to the building form and site layout to accommodate the parking deficiency resulting from the taking

It is anticipated that only a single (stand-alone) commercial unit with a very small footprint could be established on the site: supported by adequate parking to accommodate customers and employees.

The resultant loss of commercial space would not be in keeping with the planned function of this site to provide a variety of commercial services to support the daily needs of local resident and the travelling public.

She discusses “Modifications to the building would also necessitate an application to the City for Site Plan approval. The City would therefore have the authority to request a full road widening dedication consistent with the permissions of the Zoning by-law, with further restrictive development possibilities. She discusses redevelopment and concludes “it is my opinion the subject lands cannot be redeveloped without assembly with adjacent lands.”

Carrie Curtis discusses the pre and post conditions related to on site parking, traffic movements, and garbage bin location. On the issue of access, she addresses what appears to be closure of the south

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entrance, the reduction of the Essex Street access to a width below a two-way requirement, and the impact of sidewalk installation in front of the subject site. She advises that the site with its uses requires two access points. She discusses proposed street turning conditions and the impact of relocating the pedestrian access, and stop bar locations.

Findings and Opinion:

The two witnesses, Wiebe and Curtis took no issue with the proposed improvements agreeing that traffic volumes are a matter of safety issues. Similarly, Mr. Doherty in argument took no issue with the necessity of the improvements. He argues, however, that based on the evidence of Wiebe and Curtis as to the resultant of lack of functionality and use after the proposed taking, not significantly challenged, the taking should be the entire property.

Mr. Doherty argues that I have the authority to recommend the taking of the whole based on a report by a former colleague Goldkind, in re York (Regional Municipality) v. Gill, and another report in which he adopted his Gill rationale Verdiroc v. Toronto City, to support a greater taking than proposed.

In the latter report the Officer agreed with the owner's position, holding that: "In order to develop their property, the owners will be forced to enter into an agreement with the authority on terms which may be less favourable to the owners and arise as a result of the limited taking by the authority and for which the owners may not be compensated, and recommended that the authority should acquire all of the owner's property".

Mr. Belch argues that in terms of meeting the construction schedule having now to negotiate with the owners would unnecessarily delay the works. I am not sure why that would be the result at this stage since one way or the other compensation has to be determined.

My responsibility in this matter is to determine whether or not the taking proposed is fair, sound and reasonably necessary in the achievement of the objectives of the authority. The evidence of Mr. Koza supports the need for the taking proposed as the minimum necessary in this location to achieve the objective. That goal, the minimum necessary, is generally the aim in most of these matters, and is generally supportable, so that owners face the least impact possible.

There was no contrary evidence produced on the issue of need. In fact, there was agreement of the other witnesses, and it was Mr. Doherty's submission, that need had been established, but the taking was not enough. The evidence tendered by the owner's witnesses talked about the impact physically and in planning terms of the taking, and as a result of that impact the utility of the balance of the property makes it dysfunctional, so take the whole.

In this matter I accept the evidence of the planner and engineer for the owner as to a significant impact as a result of the proposed taking, and that was not significantly challenged. I disagree with my former colleague Goldkind on the issue of my jurisdiction and my ability to order the taking of the whole. I am of the opinion that the evidence of impact is a matter of compensation, which may in fact equate in value to a result of the taking of the whole.

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Conclusion:

The need has not been challenged, and the proposed taking is the minimum necessary to accomplish the objective. After considering all of the evidence and arguments, I conclude that the proposal meets the test in The Expropriations Act and the summation of as set out by the courts. The test in subsection 7 (5) of the Act is whether the proposed taking is "fair, sound and reasonably necessary in the achievement of the objectives of the expropriating authority and I so conclude. Court decisions such as in Re Parkins and the Queen (1997), 13 L.C.R. 327 (O.C.A.) conclude that the test that the inquiry officer must apply can be expressed as whether the proposal is "reasonably defensible in the achievement of the authority's objective.

For all of the reasons given above, I find that the proposed taking by the City of London of the property described is reasonably defensible in the achievement of the City's objectives.

April 27, 2017

Douglas Colbourne
Inquiry Officer

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Appendix A

WITNESSES

ted Koza (A)	Environmental Services Engineer - City of London
Carol M. Weibe (A)	Planner – MHBC Planning
Carrie Curtis (A)	P. Eng.

EXHIBITS

1. Affidavit of Service of Notice
2. Ministry Request
3. Reference Plan 33R-19516
4. Notice of Grounds
5. CV Ted Koza
- 6A Koza' notes
- 6B Acknowledgment of Expert's Duty
- 7 Plan of Phasing
8. Tunnel Plan
9. Transportation Master Plan – excerpts
10. Flash drive - EA
- 11.
12. Notice of Completion -EA
13. Notice of Completion
14. Curve Detail
15. Chapter 18 – Official Official Plan
16. Z1- City Zoning excerpts
- 17 A B C – Photos of Parking area – subject property
18. C V – Carol Wiebe
- 19 Acknowledgment of Expert's Duty

20. Air Photo

21. Wiebe Report
22. Access Management Guidelines
23. Photo - Parking Triangle
24. Curtis – C.V.
- 25 Acknowledgement of Expert's Duty
26. Curtis Report
- 27 A B C Witness Statements – John Bujouves, Jeong Su Lee, Hashen Abdie