



**Region of Queens Municipality
Planning Advisory Committee
September 4, 2025 6:00 p.m.**

Agenda

- 1. Call to Order**
- 2. Approval of Agenda**
- 3. Approval of Minutes - August 7, 2025**
- 4. Multiple Unit Residential Uses on Ground Floor in CD Zone**
- 5. Other**
- 6. Next Meeting – October 6, 2025**
- 7. Adjournment**

**Region of Queens Municipality
Planning Advisory Committee Meeting
Thursday, August 7, 2025
6:00 p.m.**

Minutes

Present: Deputy Mayor Maddie Charlton, Chair
Councillor Stewart Jenkins
Councillor Wanda Carver
Stephanie Miller Vincent
Jonathan Bowers
Mary White
Willa Thorpe, CAO
Mike MacLeod, Director of Land Use
Angela Green, Municipal Clerk

Regrets: Deanna Armstrong
Pamela Brennan

1.0 Call to Order

Deputy Mayor Charlton called the meeting to order at 6:01 p.m.

2.0 Approval of Agenda

It was moved by Councillor Jenkins and seconded by Mary White that the agenda be approved as presented.

MOTION CARRIED unanimously.

3.0 Approval of Minutes

It was moved by Councillor Carver and seconded by Mary White that the Minutes of July 7, 2025, be approved as circulated.

MOTION CARRIED unanimously.

4.0 Amendments to the Land Use Bylaw – Site Plan Criteria for Dwellings in Commercial Buildings

Director MacLeod was called to give background on his staff report and key items relating to the new application at 127 Main Street.

The applicants wish to renovate the existing vacant commercial space to create 2 commercial units, with the remainder of the building utilized for 14 residential units, indoor parking and storage units for the tenants.

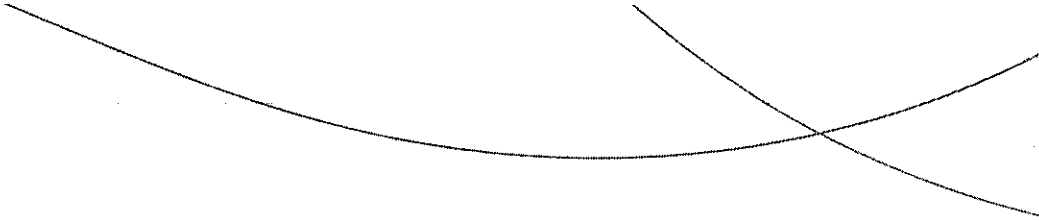
The site plan approval criteria limits the amount of residential space to a maximum of 50 percent of the ground floor area of the commercial building. While the applicant recognizes that there is community concern respecting the loss of viable commercial space, particularly along Main Street, given the significant size of the building on PID 70026364, this creates some challenges for the property owner. They have expressed concern about the ability to rent significant commercial space in the building, as required by current regulations. The property owner proposes maintaining commercial frontage on Main Street, but would like to utilize the remainder of the building for residential purposes.

To consider a proposal for residential development in a commercial building that exceeds 50 percent of the ground floor area, amendments to the Land Use Bylaw will be required. It should be noted that any approved amendments to the Bylaw would apply, not only to the applicant's property, but also to all other properties where dwellings can be considered in commercial buildings through site plan approval.

Murray Tate and Eric Fry gave a presentation on their revised development proposal. They outlined that the full investment in the property would be \$6,500,000. They feel that the revised proposal will meet the needs of both parties, Region of Queens Municipality and themselves.

Mr. Fry explained that including any amount of commercial space in their plans creates challenges for their financing, as the banks see it as too high a risk with the current commercial vacancy rates in Liverpool's Downtown. Also mentioned was that the exterior design could not be finalized until they know what is happening inside.

The committee members expressed that the new application is essentially the same as the previously rejected one, just with large windows in the front of the building, and that the main concerns of the PAC and Council were



not addressed. There was concern about the precedent this would set for the future of the Downtown Core area, and that this application did not address the concerns of the committee.

It was agreed that there is need for a review of the 50% commercial space requirement in the Land Use Bylaw, specifically in these large locations. The desire for a thoughtful discussion is there, but developers should not drive change to policy or bylaws.

It was moved by Mary White and seconded by Councillor Jenkins that the PAC recommend the following to Council:

THAT Council rejects the proposed amendment to the Land Use Bylaw at 194 Main Street and directs staff to return to the Planning Advisory Committee to explore additional options for adjustments to the residential requirements within the commercial zone in the Land Use Bylaw.

MOTION CARRIED with 5 for and 1 against.

5.0 Other

There was no other business to discuss.

6.0 Next Meeting

September 8, 2025, is the next meeting scheduled.

7.0 Adjournment

The meeting was adjourned at 8:37 p.m.

Residential Uses in Downtown Commercial Zones – Comparison with Other Municipal Units – Summary

Town of Bridgewater –

- Multiple-unit residential on the ground floor, with maximum 185 m² gross floor area, permitted as-of-right.
 - Commercial frontage is required.
 - 50% gross floor area of ground floor for commercial purposes.
- Multiple-unit residential, with gross floor area between 186 m² and 465 m², permitted through site plan approval on the ground floor.
 - Commercial frontage is required.
 - 50% gross floor area of ground floor for commercial purposes.
- Multiple-unit residential on the ground floor, with gross floor area exceeding 465 m², permitted through development agreement.
 - Commercial frontage is required.
 - 50% gross floor area of ground floor for commercial purposes.

Town of Yarmouth –

- Multiple unit residential with up to 8 units are permitted as of right on the ground floor, but only in specific areas of the downtown.
- Multiple unit residential with more than 8 units are permitted on the ground floor through a development agreement process, but only in specific areas of the downtown.

Town of Kentville –

- Multiple unit residential on the ground floor is only permitted in specific areas of the downtown.
- Where multiple unit residential units on the ground floor are permitted, commercial frontage is required.

Town of Amherst –

- Residential units on floors above the ground floor are permitted as of right.
- Multiple unit residential on the ground floor can be considered in the Downtown Zone.
- On specific streets, ground floor frontage shall be used for commercial purposes.
- On specific streets, the minimum depth of commercial frontage is 12.2 meters (40 feet).

Town of Mahone Bay –

- Multiple unit residential on the ground floor of commercial buildings is considered through site plan approval.
 - Minimum of 50% building frontage retained for commercial uses.
 - Minimum of 50% of ground floor area retained for commercial uses.
 - Minimum depth of commercial frontage is 6 meters (19.68 feet).

- Standalone multi-unit dwellings (no commercial use) considered through development agreement process.

Town of Shelburne –

- Multiple unit residential, with up to 6 units, permitted as of right.
- No commercial frontage requirements.

Town of Truro –

- New multiple unit residential; with up to 4 units; on the ground permitted as of right, but must be located behind commercial uses.
 - Minimum depth of commercial frontage is 7.5 meters (24.6 feet).
- Conversion of existing buildings to a multiple unit residential use; up to 12 units; permitted as of right, but must be located behind commercial uses.
 - Minimum depth of commercial frontage is 7.5 meters (24.6 feet).
- New multiple unit residential, with 5 – 12 units, considered through site plan approval and must be located behind commercial uses.
 - Minimum depth of commercial frontage is 7.5 meters (24.6 feet).
- New multiple unit residential, with more than 13 units, considered through a development agreement process and must be located behind commercial uses.
 - Minimum depth of commercial frontage is 7.5 meters (24.6 feet).

Residential Uses in Downtown Commercial Zones – Comparison with Other Municipal Units - Detail

Region of Queens Municipality:

- Zoning - Downtown Commercial (CD) Zone
- MPS Policy reference:
Policy 5-21: The Downtown Commercial Zone shall permit a range of commercial and community uses of a scale and type appropriate to a downtown context. Automobile-related uses shall be prohibited, with the exception of parking lots designed to minimize their impact on the pedestrian experience. **Residential uses shall be permitted, but shall only be located in buildings with commercial uses and shall be secondary to the commercial storefront.**
- LUB Provisions:
Dwellings in Commercial Buildings – permitted through site plan approval process.
 - Site Plan Criteria (Section 17.2)
17.2 Dwellings in Commercial Buildings
17.2.1 Where a zone permits dwellings in commercial buildings by site plan approval, the Development Officer shall approve a site plan agreement where the requirements of this Land Use Bylaw and the following matters have been addressed:
 - (a) Use Allocation
 - (i) Dwellings located on the ground floor shall not exceed a total of 50 percent of the ground floor area.
 - (ii) Dwellings located on the ground floor shall be located to the rear of the commercial use(s).
 - (iii) On corner lots, ground floor commercial use(s) shall wrap around the corner from the front lot line along the flankage lot line to a minimum distance of 5 metres or 50 percent of the building depth, whichever is less.
 - (iv) In buildings constructed after May 24, 2022, ground-floor residential uses shall have a floor-to-floor height of no less than 4 metres.
 - (b) Access
 - (i) Entrance(s) to residential uses shall be separate from the entrances for other uses.
 - (ii) Residential entrances shall not exceed a width of 2 metres on the front façade.

Town of Bridgewater:

- Zoning - Historic Downtown Commercial (C1) Zone
- MPS Policy Reference:
 - Policy C-14: It shall be a policy of Council to permit the following developments as-of-right in the Historic Downtown Commercial (C1) Zone, up to a maximum of 185m² (1,991ft²) in gross floor area:

- c) Multi-unit residential development where the ground floor building frontage is occupied by a commercial use and more than 50% of the ground floor area is used for commercial purposes;
- Policy C-16: It shall be a policy of Council to permit the following developments by site plan approval in the Historic Downtown Commercial (C1) Zone, between 186m² (2,002ft²) and 465m² (5,005ft²) in gross floor area:
 - c) Multi-unit residential development where the ground floor building frontage is occupied by a commercial use and more than 50% of the ground floor area is used for commercial purposes, in accordance with the criteria outlined in the Land Use By-law;
- Policy C-17: It shall be a policy of Council to consider the following developments by development agreement in the Historic Downtown Commercial (C1) Zone:
 - c) Multi-unit residential development where the ground floor building frontage is occupied by a commercial use and more than 50% of the ground floor area is used for commercial purposes, in accordance with the criteria outlined in the Land Use By-law, in accordance with Policy CDA-8;
- Policy CDA-8: It shall be a policy of Council to ensure that the following criteria are met when Council is considering proposals for multi-unit residential development in the Historic Downtown Commercial (C1), Urban Commercial (C3) and Group Commercial (C4) Zones:
 - a) New developments shall front onto an arterial or collector street;
 - b) In the Historic Downtown Commercial (C1) and Urban Commercial (C3) zones, new developments shall be no less than two storeys in height;
 - c) In the Historic Downtown Commercial (C1) Zone, all development shall give strong consideration to the urban design requirements outlined in the Land Use By-law;
 - d) In the Urban Commercial (C3) Zone and the Group Commercial (C4) Zone, buildings greater than two storeys shall have an architecturally distinct base of one-to-two storeys and a distinct top;
 - e) In the Urban Commercial (C3) Zone and the Group Commercial (C4) Zone, buildings on corner lots should incorporate articulation and forms that emphasize the importance of the corner;
 - f) New developments shall adhere to the minimum amenity space requirements outlined in the Land Use By-law; and
 - g) The development is in accordance with Policy IM-6.
- LUB Provisions:
 - Permitted Developments:
 - Multi-Unit Residential Development, where the ground floor building frontage is occupied by a commercial use and more than 50% of the ground floor area is used for commercial purposes, up to a maximum of 185m² (1,991ft²) in gross floor area, shall be permitted as-of-right.
 - 5.2.3 Developments by Site Plan The following developments, between 186m² (2,002ft²) and 465m² (5,005ft²) in gross floor area, shall be permitted by site plan approval in the Historic Downtown Commercial (C1) Zone subject to the requirements of this By-law, including the site plan criteria outlined in Section 5.1.4:
 - a. New developments listed in Section 5.2.1, except for two and three unit dwellings on all streets excluding King Street.

- 5.2.4 Developments by Development Agreement The following developments shall be permitted by Development Agreement in the Historic Downtown Commercial (C1) Zone subject to the requirements of this By-law, in addition to the development agreement policies outlined in the Municipal Planning Strategy:
 - b. New multi-unit residential development exceeding 465m² (5,005ft²) in gross floor area, where the ground floor building frontage is occupied by a commercial use and more than 50% of the ground floor area is used for commercial purposes, in accordance with MPS Policy CDA-8;

Town of Yarmouth

- Zoning - Downtown Commercial (C1) Zone
- MPS Policy Reference:
 - Policy 5.7 (A) It shall be the intention of Council to allow up to a maximum of eight (8) residential dwelling units per lot in the Downtown Commercial (C-1) Zone provided the residential use does not locate at street level. Notwithstanding, residential dwelling units may be developed at street level on lots south of Forest Street and north of Grand/South Street.
 - Policy 5.7 (B) It shall be the intention of Council to allow up to a maximum of eight (8) residential dwelling units per lot in the Downtown Commercial (C-1) Zone provided the residential use does not locate at street level. Notwithstanding, residential dwelling units may be developed at street level on lots that directly abut the soft line boundary of the Residential designation.
 - Policy 5.7 (C) It shall be the intention of Council to not permit new residential buildings on Water Street in the C-1 Zone.
 - Policy 5.11 It shall be the intention of Council to enable the development of more than eight (8) residential units per lot in the Downtown Commercial (C-1) Zone by Development Agreement pursuant to Section 225 of the Municipal Government Act and subject to the following:
 - (1) That the residential units are not located at street level; or otherwise located directly abutting the soft line boundary of the Residential Designation in which case residential units may be permitted at street level; or otherwise located south of Forest Street or north of Grand/South Street in which case residential units may be permitted at street level;
 - (2) That the minimum on-site parking requirements can be met or cash-in-lieu of parking has been paid; and,
 - (3) That the proposal conforms to criteria contained in Implementation Policy 10.8.
- LUB Provisions:
 - 17.2 Residential Units at Street Level
Notwithstanding Section 17.1, residential dwellings units up to a maximum of eight (8) units per lot may establish residential dwelling units at street level south of Forest Street or north of Grand/South Street.”

- 17.3 Residential Units at Street Level
Notwithstanding Section 17.1(1), residential dwellings units up to a maximum of eight (8) units per lot may establish residential dwelling units at street level by Site Plan Approval provided they meet the following requirements:
 - (1) The dwelling unit does not front on Main Street;
 - (2) The entrance to the dwelling unit is removed or set back from the public space (sidewalk & street) through the use of a change in grade, steps, planters, etc.; and,
 - (3) Windows that view into living quarters are not located at street level or are screened in some manner to prevent the general public from viewing the interior of the home (tinted glass, window decals, etc.).

- 17.5 Uses Permitted by Development Agreement
In the Downtown Commercial (C-1) Zone, Municipal Planning Strategy Commercial Policies 5.11, 5.12, and 5.21 provide that the following uses may be considered for development only by Development Agreement:
 - (1) New residential developments containing more than eight (8) units provided they are not located at street level; or otherwise located directly abutting the soft line boundary of the Residential Designation in which case residential units may be permitted at street level; or otherwise located south of Forest Street or north of Grand/South Street in which case residential units may be permitted at street level.

Town of Kentville

- Zoning - General Commercial (C1) Zone

- MPS Policy Reference:
 - Policy C-7 7.2.2.2 It shall be the policy of Council to prohibit the conversion of any commercial property to residential on the street level in the General Commercial (C1) Zone for properties having frontage on Main Street between Aberdeen and Leverette; Cornwallis Ave from the intersection at Main and the Cornwallis Bridge; Webster Court, Webster Street, River Street, Station Lane and Justice Way, include ground floor Residential Dwelling Units, as shown on Appendix B of the Land Use By-law.

- LUB Provisions:
 - Permitted Uses –
Multi-Unit Residential Development, where the ground floor building frontage is occupied by a commercial use, subject to Section 6.2.4 of this Bylaw

 - 6.2.4 Special Provisions for Residential Uses
An existing building, or parcel of land, at the time of the adoption of this Bylaw, in the General Commercial (C1) Zone may be converted to permit Multi-Unit Residential and may, except for properties having frontage on portions of Main Street, Aberdeen Ave, Cornwallis Street, Webster Court, Webster Street, River Street, Station Lane and Justice Way and more specifically shown on Appendix "B", include ground floor Residential Dwelling Units.

Town of Amherst

- Zoning – Downtown
 - MPS Policy Reference:
 - CP-15 It shall be the intention of Council to consider applications for ground floor residential uses in the Downtown Zone by Development Agreement excluding that portion of a building that abuts Church, Victoria and Havelock Streets. Outside said streets, applications for new residential buildings or ground floor conversion of existing commercial and institutional buildings will not be considered for residential uses unless it can be shown that such a conversion will not detract from the commercial character of the surrounding streetscape.
- In negotiating such a development agreement, Council shall take into account:

(h) that the ground floor frontage of any building fronting on Church, Havelock or Victoria Streets shall be used for commercial purposes.

- LUB Provisions:
 - Permitted uses –
Residential uses subject to section 8.1.1, 8.3.2, and 8.4
 - 8.1.1 Residential Uses in Commercial Zones
In any Commercial Zone, any development permit for a residential use shall: (i) satisfy all applicable Residential standards in this Bylaw.)
 - 8.3.2 Permitted uses by Development Agreement
In the Downtown Zone, a development permit application for the following uses shall be considered by development agreement in accordance with the applicable Municipal Planning Strategy (MPS) Policies:
 - (d) Ground floor residential uses subject to MPS Policy CP-15.
 - 8.4.5 Residential Uses
In the Core Area District, residential requirements shall be subject to the relevant sections of this Bylaw, and the following requirements:
 - a) upper floor conversions of non-residential uses to a residential use shall be permitted;
 - b) detached single and double dwellings are not permitted;
 - c) ground floor residential uses may be permitted for developments containing twenty (20) or more dwelling units on principal streets, subject to MPS Policy CP-15;
 - d) on any principal street, the first 12.2 m (40 feet) of building ground floor area, measured at 90 degrees from the property line abutting any principal street, or the front of the building facing the street in cases where the front of the building is not located directly on the front property line, shall be restricted to non-residential uses otherwise permitted in the zone;
 - e) new residential buildings shall be no less than 2 stories;
 - f) buildings shall align with the front and flanking yard setbacks established by existing buildings on the same block.
 - g) primary entries to multi-unit buildings shall front on a street;

- h) the primary entry shall be a highly visible architectural feature incorporating elements such as awnings, roof overhangs, lighting, double doors, glazing and/or distinct architectural materials;
- i) buildings with multiple stories shall have an architecturally distinct base, middle, and top;
- j) mechanical or communication appurtenances larger than 0.50 square meters shall not be visible from the street;
- k) all patios shall be recessed into the building at least 1.5 meters, with no patio extending more than 2.0 meters beyond the outer building wall; and,
- l) buildings with frontage greater than 12 meters shall be broken down into horizontal compartments with a distinct change in vertical architectural articulation using at least one of the following: different materials, projections, bays, roof changes, or colours.

Town of Mahone Bay –

- Zoning – Commercial Core (CC)
- MPS Policy Reference:
 - Policy 5-20: Council shall, through the Land Use Bylaw, permit single- and two-unit dwellings, and triplex dwellings in the Commercial Core Zone, within commercial buildings, intended to support mixed used development in the downtown core.
 - Policy 5-21: Council shall, through the Land Use Bylaw, permit the following uses by site plan approval in the Commercial Core Zone:
 - (c) multi-unit dwellings in commercial buildings and in the rear yard;
 - Policy 5-22: Council shall consider, by development agreement, proposals for the following uses in the Commercial Core Zone, and subject to the policies in Section 6.6:
 - (d) stand-alone multi-unit dwellings;
 - Policy 5-23: Council shall, through the Land Use Bylaw, require a minimum of 50 percent of street level frontage and street level floor area in the Commercial Core Zone to be dedicated to a commercial use permitted in the zone to reinforce and support the evolution and expansion of the commercial downtown in Mahone Bay.
- LUB Provisions:
 - Permitted Uses –
 - Multi-unit Dwelling*
 - » In rear yard of a commercial building Site Plan
 - » With no commercial use on the lot Development Agreement
 - » Within a commercial building Site Plan

➤ Ground Floor Commercial Uses Required

9.1.6. In the Commercial Core (CC) Zone and Commercial General (CG) Zone, the following portions of any main building shall be retained for non-residential uses permitted in the zone:

- (a) at least 50% of the facade width on the building level closest in elevation to the street from which the building gains its principal access, and extending horizontally back from the street a minimum of 6 meters measured perpendicularly from the outside wall of that facade; and
- (b) at least 50% of the floor area of the level closest in elevation to the street from which the building gains its principal access.

Town of Shelburne –

- Zoning – Commercial General (C1)

- MPS Policy Reference:

➤ Policy 23- It shall be the intention of Council to establish the C-1 General Commercial Zone within the area designated Commercial on Hap 1, the Generalized Future Land Use Hap.

(2) In addition to subsection (1) above, any use permitted in the R-1 Zone shall also be considered a permitted use in the C-1 Zone.

- LUB Provisions:

➤ Permitted Uses –

Any use permitted in the R-1 Zone

(R-1 Uses Permitted

38. No development permit shall be issued in a Residential General (R-1) Zone except for one or more of the following uses:

- *Single detached dwellings*
- *Duplex and semi-detached dwellings*
- *Row house dwellings (subject to the requirements of Section 43, not exceeding 6 units)*
- *Apartment buildings (not exceeding 6 units)*

Town of Truro –

- Zoning – Downtown Core (DC)

- MPS Policy Reference:

➤ Policy DC-70 It shall be a policy of Council to, within the Downtown Core (DC) Zone, permit the as-of-right development of a new multiple unit residential development or new mixed use development with up to four dwelling units provided the proposal does not include any dwelling units adjacent to the street.

- Policy DC-71 It shall be a policy of Council to permit the as-of-right conversion of an existing structure within the Downtown Core (DC) Zone to a multiple unit residential use or mixed use development with up to twelve dwelling units provided the conversion does not include any dwelling units adjacent to the street.
 - Policy DC-73 It shall be a policy of Council to, within the Downtown Core Policy Area or Downtown Core (DC) Zone, consider a new multiple unit residential development or a new mixed use development with more than four and up to twelve dwelling units only by site plan approval. In considering such proposals council shall have regard for the site plan approval criteria set out in the Downtown Core (DC) Zone.
 - Policy DC-74 It shall be a policy of Council to, within the Downtown Core Policy Area or Downtown Core (DC) Zone, consider a new multiple unit residential development or a new mixed use development with more than twelve dwelling units only by development agreement. In considering such proposals council shall have regard for the evaluative criteria for development agreements contained in Chapter 14: Implementation.
- LUB Provisions:
 - 4.2 AS-OF-RIGHT DEVELOPMENT
 - 4.2.1 Downtown Core (DC) Zone Requirements As-of-right uses in the Downtown Core (DC) Zone shall be permitted subject to the requirements set out in Table 4.2 in addition to all other applicable requirements of this By-law:
 - 4.4.10 Residential Use (up to 4 dwelling units) A new mixed use development with up to 4 dwelling units may be permitted in the Downtown Core (DC) Zone provided the structure does not include any ground floor residential space within 7.5 m (24.6 ft) of a public right-of-way.
 - 4.4.11 Residential Conversion (up to 12 dwelling units) An existing building in the Downtown Core (DC) Zone may be converted to a residential or mixed use development with up to 12 dwelling units on a single property provided the structure does not include any ground floor residential space within 7.5 m (24.6 ft) of a public right-of-way.
 - 4.5 USES BY SITE PLAN APPROVAL
 - 4.5.1 Uses Permitted by Site Plan Approval DC The following uses may be permitted by site plan approval in the Downtown Core (DC) Zone subject to the site plan criteria outlined in subsection "4.5.2 Site Plan Criteria" and all other applicable requirements of this By-law:
 - d) Residential (5 to 12 dwelling units in a new structure or new addition) provided the structure does not include any ground floor residential space within 7.5 m (24.6 ft) of a public right-of-way.
 - 4.6 USES BY DEVELOPMENT AGREEMENT
 - 4.6.1 DC Zone Uses Permitted by Development Agreement

The following uses shall be considered only by development agreement in the Downtown Core (DC) Zone:

- a) Residential Multiple Unit Use with 13 or more dwelling units.
- b) Residential Multiple Unit Use with ground floor residential space within 7.5 m (24.6 ft) of a public right-of-way

Multiple-Unit Residential Uses on Ground Floor in Downtown (CD) Zone –

Discussion Primer



Amend current regulations? Yes / No

If no, end of process.

If yes, potential considerations –

Which planning process?

As-of-right, site plan, development agreement or combination of all

Maintain commercial frontage? If yes,

Which streets apply?

All streets in CD Zone

Specific street (s)

What would constitute viable commercial space?

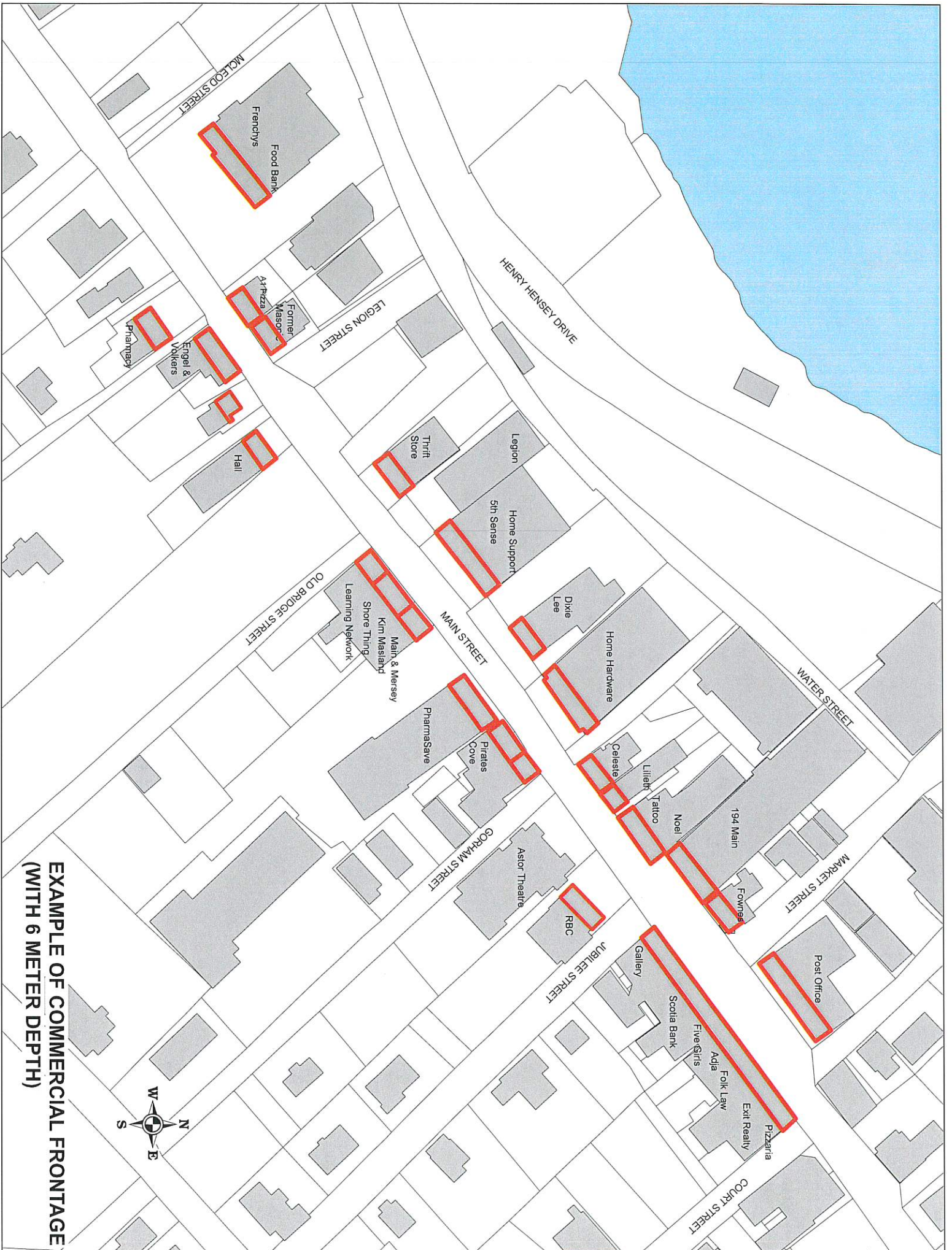
Minimum size of commercial space?

Minimum depth of commercial space?



Attached map provides an example of what maintaining commercial frontage could look like along Main Street, at a depth of 6 meters. For some context, below are several examples of buildings in the CD Zone with approximation of ground floor size and approximation of size of commercial frontage at the example of 6 meter depth.

<u>Building</u>	<u>~Ground Floor Area of Building</u>	<u>~Size of Commercial Frontage</u>	<u>%</u>
Frenchys / Food Bank	1,100 sqm	200 sqm	18%
5 th Sense / Home Support	1,000 sqm	170 sqm	17%
Dixie Lee	515 sqm	70 sqm	14%
Lilieth Boutique	240 sqm	45 sqm	19%
194 Main Street	1,500 sqm	130 sqm	9%
Post Office	740 sqm	205 sqm	28%



**EXAMPLE OF COMMERCIAL FRONTAGE
(WITH 6 METER DEPTH)**