



PLANNING STAFF REPORT

SUBJECT: Royal Canadian Legion Chatham Branch #3 – 18 McCurdy St.
Miramichi

MEETING DATE: February 18th, 2025

AGENDA ITEM: 2025-1-2

In accordance with the *New Brunswick Community Planning Act*, variance requests are permitted from the standards prescribed by the City of Miramichi Zoning By-law (By-law 110). The Royal Canadian Legion Chatham Branch #3 has submitted an application to the Greater Miramichi Service Commission – Development Services, the City's land use planning service provider, requesting multiple variances related to building and parking placement. These variances would enable the construction of a new Legion Hall at 18 McCurdy Street (PID 40521601), replacing the existing building.

Under section 55(1)(b) of the *Act*, the newly established City of Miramichi Planning Review and Adjustment Committee (PRAC) has the authority to consider such variance requests. This report provides an overview of the proposed development, planning considerations, public input, departmental and agency comments, and a professional planning recommendation for PRAC's consideration.

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Application Overview & Proposed Use

Table 1: Property Information and Application Overview

PID / PAN	<ul style="list-style-type: none">PID 40521601 – see Attachment 1: Chatham Branch #3 Royal Canadian Legion Subdivision Plan 2014-1PAN 6353045 – SNB Property Assessment Online
Property Area (per Service NB)	2442m ² (0.6 acres/0.25 ha)
Proposed Access	<ul style="list-style-type: none">Driveways to main parking lot off McCurdy Street and Church Street.Additional 90-degree parking at the front of the building, accessed directly from McCurdy Street.Pedestrian access on McCurdy Street.
Servicing	Municipal water, sewer, and storm services available
Zoning Designation	General Commercial (GC) - Interactive Zoning Map
Municipal Plan Designations	<ul style="list-style-type: none">Future Land Use (Schedule A): CommercialCommercial Hierarchy & Designations (Schedule C): Downtown District
Existing Use	Assembly Hall
Proposed Uses	Assembly Hall, Licensed Lounge, Office.
Surrounding Land Uses	Mixed-use area: residential, commercial, institutional, office, and recreational.

A variance application has been submitted to GMSC – Development Services by Paula McKenna and Rene Smith on behalf of Royal Canadian Legion Chatham Branch # 3 regarding the Subject Property located at 18 McCurdy St. Miramichi, identified by PID 40521601. The applicant is proposing to construct a new, single-level Legion Hall, replacing the existing multi-level building.

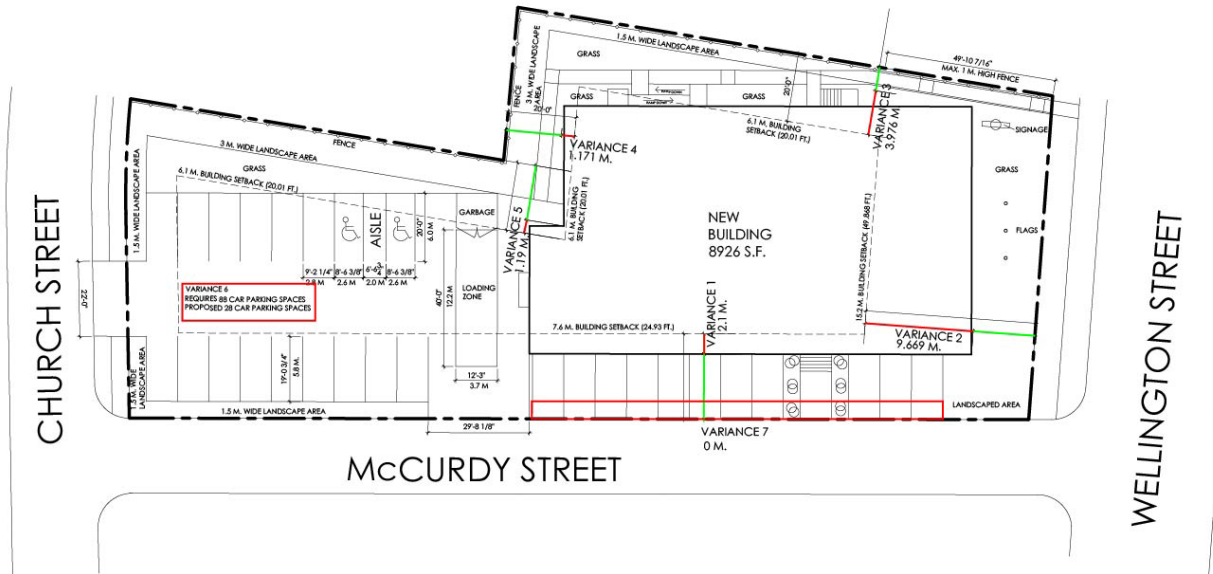
The new building would feature:

- A licenced lounge, kitchen, meeting room, office, video game room, and multi-purpose room for activities such as bingo and community events.
- An on-site parking lot at the south end of the property, with driveway access off McCurdy Street and Church Street.
- 90-degree parking along the McCurdy Street side of the building, accessed directly from the street.
- Barrier-free accessibility.

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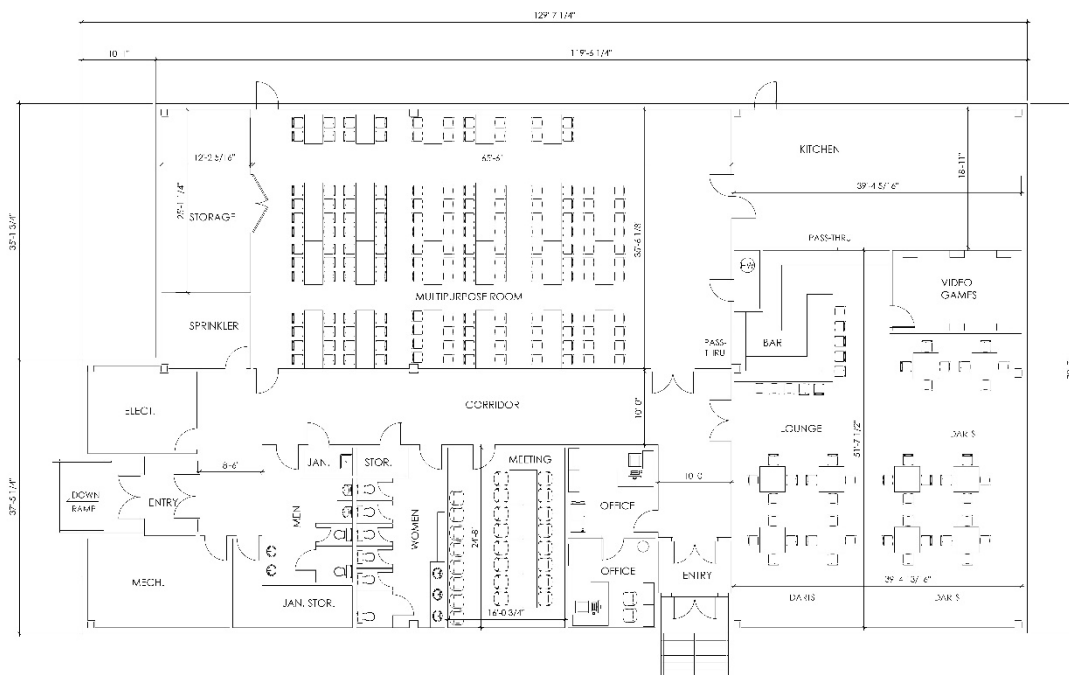
The applicant's site plan and floor plan are provided below (Figures 1 and 2) and in the Attachments section of this report. Note that Figure 1 includes markups from staff showing the subject zoning standards and requested variances. No elevation drawings or renderings were included in the application package.

Figure 1: Applicant's Site Plan, including Staff Markup



Note: The coloured lines highlight the subject zoning standard. The red lines denote the variances.

Figure 2: Applicant's Floor Plan



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The applicant is requesting seven variances related to setbacks, parking, and landscaping requirements, as summarized in Table 2 below.

Table 2: Summary of Variances

Variance #	Description	Zoning By-law Section	Required Standard	Proposed	Variance	% Variance
1	Setback from front property line abutting a local street (McCurdy)	3.1.4	7.6m	5.8m	1.8m	24%
2	Setback from front property line abutting an Arterial (Wellington)	3.1.4	15.2m	5.529m	9.671m	64%
3	Rear Setback abutting PID 40194961	7.2.2(g)	6.1m	2.119m	3.981m	65%
4	Side Setback abutting PID 40493322	7.2.2(f)	6.1m	4.927m	1.173m	19%
5	Side Setback abutting PID 40493322	7.2.2(f)	6.1m	4.91m	1.19m	20%
6	Minimum Parking stalls	4.21(1)	88 stalls	28 stalls	60 stalls	68%
7	Landscaped area on all sides (excluding Driveways). The variance is to allow for parking next to building on McCurdy Street.	7.2.2(1)(m)	1.5m	0m	1.5m	100%

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The applicant has provided the following rationale for the proposed development and variances:

“The New Building is to be built for veterans and their families. This will require the building to be built on one level with barrier free access to all parts of the building, something which they do not have now. The New Building will be too big to meet the building setbacks. Their existing building is located on three levels with no barrier free access. Barrier free access is very important for its aging members. The existing building is no longer functioning properly for its members and it does not meet Code in many ways.

Finally, the Site will only allow for 30 parking spaces [28 on the most recent Site Plan] but requires 80 parking spaces [88 by staff calculations]. Presently cars park on the street besides the parking lot and it is hoped they can continue to do this.”

Legislative Context and PRAC Review Authority

Pursuant to Section 55(2) of the *Community Planning Act* and 2.8.1 of the City of Miramichi Zoning By-law, a Development Officer may permit a reasonable variance from the City’s Zoning provisions, but due to the number and magnitude of the variances proposed, the Development Officer has exercised the authority granted in section 2.8.2 of the City of Miramichi Zoning By-law (No. 110) to forward a decision on this request to the PRAC.

When a variance application is decided on by the PRAC, pursuant to section 55(1)(b) of the *Act*, the PRAC “may permit a reasonable variance from the requirements of... a zoning by-law if it is of the opinion that the variance is desirable for the development of a parcel of land or a building or structure and is in keeping with the general intent of the by-law and any plan under this Act affecting the development.”

Planning Considerations – Municipal Plan and Zoning By-law

The Municipal Plan (By-law No. 109) sets out Miramichi City Council's long-term policies and proposals to guide future land use and development within the Municipality. The Plan is intended to be used by Council, City staff, GMSC – Development Services, the PRAC, developers, businesses, community organizations, and residents to guide day-to-day decisions affecting development.

The City of Miramichi Zoning By-law (No. 110) regulates the use of land in conformity with the Municipal Plan. The Zoning By-law is used to carry out the policies and proposals of the Municipal Plan.

Future Land Use and Downtown District Context

In the Municipal Plan, the Future Land Use Map designates the Subject Property as “Commercial” and the Commercial Hierarchy and Designations Schedule includes the

property as part of a “Downtown District” Area. The Municipal Plan states that “Downtown District areas have a relatively high-density of development, are pedestrian-oriented and provide parking on the public road as well as in public and private parking lots”. Reusing or revitalizing serviced sites in Downtown Districts is strongly encouraged to promote a vibrant urban core.

Figure 3: Municipal Plan Schedule A: Future Land Use Map

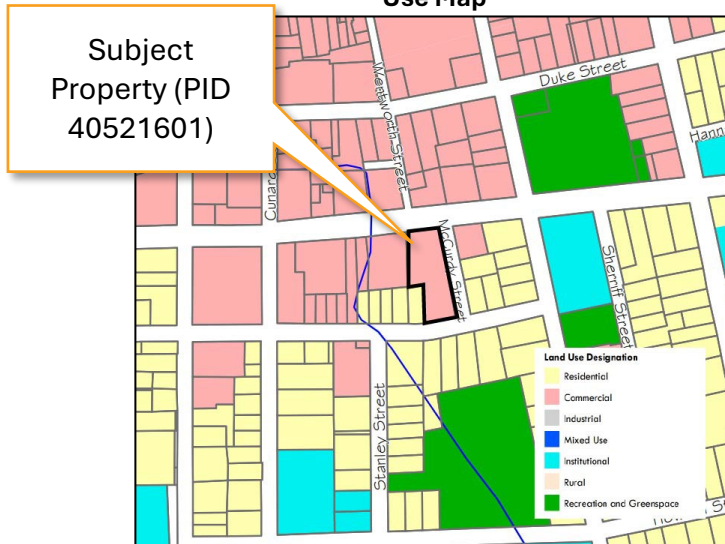
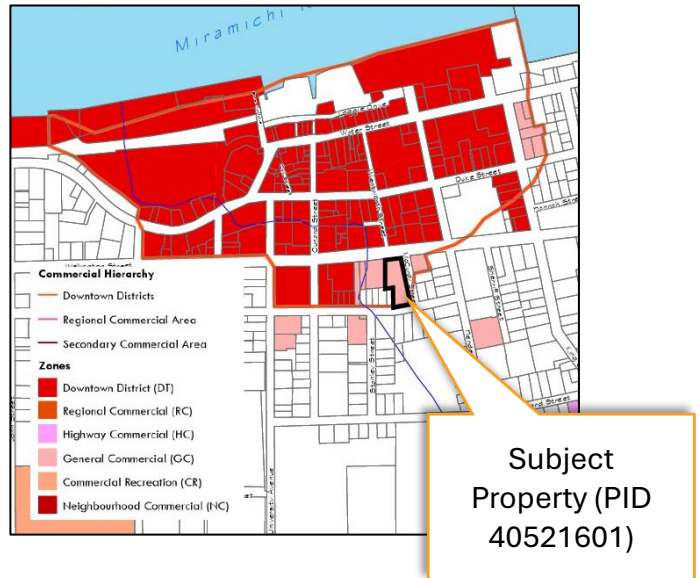


Figure 4: Municipal Plan Schedule C: Commercial Hierarchy and Designations



The following Commercial policies and proposals from the Municipal Plan pertain to the proposed development:

- Section 6(A), Policy 2: Encourages intensification and enhancement of Downtown Districts.
- Section 6(A), Policy 7: Favours reuse and renewal of existing commercial buildings and serviced locations.
- Section 6(C), Policy 2: Recognizes Downtown Districts as focal points for social, cultural, and community facilities – a role closely aligned with Legion Halls.
- Section 6(C), Policy 5: Specifically contemplates no building setback requirements, no mandatory landscaping, and no on-site parking requirement (or cash-in-lieu) within Downtown Districts.

These policies provide broad support for the proposed development. The location intensifies and enhances a site in the Downtown District in accordance with Section 6(A) Policy 2 and renews an existing serviced location in accordance with Section 6(A) Policy 7. Section 6(C) Policy 5 explicitly supports a development that does not meet the requirements for which the applicant is seeking variances, including a removal of setback requirements (b), landscaping requirements (c) and parking requirements (e).

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While these policies clearly support reduced (or zero lot line) setbacks, landscaping, and parking, the Municipal Plan also highlights the need for adequate parking and thoughtful design. Section 6(C), Proposal 1(g) references “adequate parking lots and loading facilities,” which could raise concerns about a significant reduction in on-site parking (88 required → 28 proposed). Further, although Section 6(C), Policy 5 encourages flexibility in landscaping, other elements of the Plan promote community appearance, greenspace, and environmental sustainability.

Pedestrian and Transportation Considerations

Situated in a central location in Miramichi’s east side, the proposed development aligns with the Municipal Plan’s objective of creating compact, pedestrian-friendly areas. Section 6(C), Policy 6 promotes walkability in downtown settings, and Section 7(H), Policy 3(c,e) encourages a mix of transit use and pedestrian priority.

Downtown intensification can help reduce car dependency and support active transportation, which is a key theme in the Plan. The Plan explicitly recognizes that lower or no on-site parking is acceptable in Downtown Districts to foster walkability and focus on active transportation.

While reduced on-site parking can be beneficial in encouraging alternative modes of travel, it could create spillover parking on adjacent local streets or neighbouring properties, particularly during large community events. If poorly managed, this might affect the safety and convenience of pedestrians and local traffic.

Landscaping, Environment, and Visual Appearance

The Municipal Plan stresses the importance of vibrant streetscapes and, in other contexts, the role landscaping can play in environmental stewardship and community design.

Section 6(C), Policy 5(c): Permits elimination or reduction of landscaping within Downtown Districts to encourage a denser, more urban form. Compact downtown development can reduce urban sprawl, which aligns with the Plan’s environmental sustainability goals.

In other sections, the Plan supports green space, tree cover, and buffering to enhance visual appeal, manage stormwater, and contribute to the City’s overall environmental objectives. Eliminating landscaped setbacks entirely (0m instead of 1.5m) may be perceived as inconsistent with these broader design or environmental objectives. A proposed landscaped area with flag features along Wellington Street suggests appearance and functionality will remain compatible with downtown surroundings.

Public Health, Community Facilities, and Social/Cultural Functions

A key part of the Municipal Plan is promoting community wellness and inclusive infrastructure. A new barrier-free Legion Hall offering meeting rooms, a lounge, and various

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social functions aligns with the Plan's emphasis on maintaining strong community services.

Supportive policies include:

- Section 6(C), Policy 2 (Downtown as social/cultural hub): The project directly advances this goal by improving a well-established community institution.
- Section 7(H), Policy 3 (community wellness): Encourages accessible, compact, and walkable environments that the Legion can further support by hosting regular events and gatherings.

Little in this policy area detracts from the project, but the Plan's desire to ensure safe pedestrian movement, robust public services, and attractive streetscapes means the Owner should maintain high standards for operational considerations not regulated by zoning (e.g., deliveries, event traffic).

Zoning By-law (No. 110) Compliance

The property is zoned General Commercial (GC) – see Figure 5 – which permits assembly halls, licensed lounges, and offices. Aside from the requested variances, the proposal meets all other zoning requirements, including height restrictions (proposed building is single story), and general use provisions. As indicated, Section 2.8.2 of the Zoning By-law permits the Development Officer to forward large or complex variance applications to the PRAC, as has been done here.

Figure 5: Zoning By-law (No. 110): Schedule A and B



Staff have noted a discrepancy between the applicant's calculation for the parking requirement (80 stalls) and the staff's own calculation (88 Stalls). Table 3 explains how staff calculated the parking requirements in accordance with section 4.2.1(1) of the Zoning By-law. On the other hand, the Site Plan (attachment 3) shows the client's calculation. The difference between the two calculations is that the applicant's calculation for the lounge use is based on seating, while staff calculated it based on area. Section 4.2.1(1)(h) states that the parking requirement for a licensed establishment is "1 per 7m² of floor area or 1

per 3 seats, whichever is the greater”. The greater calculation is the one based on area, thus the staff calculation based on 88 stalls is the correct one. Either way, the applicant’s proposed number of parking stalls (28), does not meet the requirement and thus it requires a variance.

Table 3: Calculations for Parking Requirements

Multipurpose room (Subsection f. Assembly Hall)		Area of use (provided by applicant)	218.98m ²
		Area per parking spot	/ 3.7m ²
		Parking required for area of use	60 stalls
Bar/Lounge (Subsection h. Restaurant)	Calculated for seats	Fixed Seats	50 seats
		Fixed Seat per parking stall	/ 3 seats
		Parking required for fixed seats	17 stalls
	Calculated for area	Area (provided by applicant)	179.1319m ²
		Area per parking spot	/ 7m ²
		Requirement for area of use	26 stalls
	Parking requirement	Parking Requirement (the greater of the two calculations)	26 stalls
Office (Subsection. q. Office)		Area (provided by applicant)	26.998m ²
		Area per parking spot	/ 25m ²
		Parking Required for area of use	2 stalls
Total Requirement		60 + 26 + 2 = 88 stalls	

Note: These calculations are made in accordance with Zoning By-law (No. 110) sec. 4.2.1(1). The parking requirement is calculated as the sum of requirements for each of the uses. Where two calculations for one use are provided (i.e., the lounge), the greater requirement is used.

Development Services Staff Assessment

Overall, the proposed redevelopment is strongly supported by multiple Municipal Plan policies that seek to revitalize the Downtown Districts, promote barrier-free facilities, and concentrate social institutions in central locations. The proposed design and variances largely fulfill the Plan’s growth strategy for downtown intensification and flexibility on setbacks, parking, and landscaping. However, ensuring that reduced on-site parking and landscaping do not negatively affect neighbourhood safety, pedestrian amenities, or traffic patterns are too, important considerations.

While the magnitude of some variances (especially for parking and landscaping) is notable, the Municipal Plan *explicitly* contemplates a flexible approach in Downtown Districts to encourage denser, pedestrian-oriented development. If parking demand is operationally managed appropriately, staff believe the application conforms to the Plan's overall direction for downtown revitalization and community facility enhancements.

Neighbourhood Character & Impact

The Subject Property is located in central Chatham on a corner/through lot abutting McCurdy Street (local), Church Street (local) and Wellington Street (arterial). The surrounding land uses feature a diverse mix of residential, office, commercial and institutional uses, contributing to a dynamic urban environment.

The area's traditional streetscape, characterized by a blend of historic and modern buildings reflects Chatham's evolution as a civic and cultural hub. The existing Legion Hall has been a long-standing presence in this neighbourhood and supports the area's identity as a social gathering space and an anchor community activities.

Figure 6: Aerial View



Heritage Considerations

The existing Legion building, also known as St. Luke's Hall, is a municipally designated Local Historic Place under section 68 of the Heritage Conservation Act. It's noted for its architectural value, being a good example of the "Queen Anne Revival" Architectural style. This building, which was built in 1913 and designed by Reverend Robert Fulton and Neil F.

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Brodie, was previously used as a parish centre for the Methodist Church ([New Brunswick Register of Historic Places, 2006](#)).

Despite the designation as a Local Historic Place, it should be noted that pursuant to section 68(2) of the Heritage Conservation Act, this designation does not “impose any restrictions or obligation on the owner of the property”. Accordingly, the building’s designation does not play a role in the decision-making process for this approval (i.e., there are no heritage protections in place).

While the Municipal Plan encourages the adaptive reuse of historic buildings, it also supports redevelopment that modernized community spaces to meet accessibility and operational needs. The proposed replacement of the Legion Hall represents an opportunity to maintain the site's historic role as a civic gathering place while modernizing its facilities to enhance accessibility and community engagement.

Traffic, Parking, and Pedestrian Considerations

The applicant provided the following statements regarding the parking need:

- The capacity of the proposed building is similar to the existing building.
- The existing parking lot provides approximately 50 parking spaces (there may be fewer, by staff estimates).
- During large events with a continuous flow of people, parking has not been an issue.
- Parking demand has never caused a conflict with neighbours.

With 28 proposed parking stalls in the site plan, the site will be losing approximately (net, post-development) 22 on-site parking stalls. Staff are satisfied that the proposed building will have a similar need for parking as the existing building, and that the existing parking arrangement satisfied the need existing need. With a similar parking need, but lesser supply of parking, the Legion may see a greater need for street parking: it should be reiterated that street parking is both anticipated and supported by the Municipal Plan for the Downtown District area. For this reason, staff are satisfied that the combination of on-site and street parking is adequate for the needs of the proposed Legion.

Staff recognize that there is the potential for both traffic and pedestrian conflicts resulting from the proposed on-site parking on the McCurdy side of the proposed Legion Hall. As outlined in a later section of this report, this is to be determined by the City of Miramichi Engineering and Public Works Departments. Any approval to allow parking in that location should be conditional upon approval from Engineering and Public Works. Staff recommend that any approval include flexibility to accommodate a potential reduction in on-site parking without requiring additional variances.

Views of the Public

Notification letters, including details on the variance application and the PRAC meeting, were mailed to 18 unique property owners. A radius of 30m from the Subject Property’s

boundaries was used, in accordance with the PRAC By-law and Operating Procedures. Notification signage was posted on the Church St. side of the Subject Property, also in accordance with the PRAC By-law and Operating Procedures.

At the time of drafting this report, no written feedback has been received regarding this proposal. Staff received one phone call from a member of the public with questions about the proposed development and they voiced overall support.

Given the low volume of public feedback and the lack of noted opposition, there is no indication of public concern regarding the requested variances.

Department and Agency Comments

The variance application was circulated to a number of external departments and agencies in order to give them the opportunity to provide comment or identify any concerns regarding the proposal, relevant to their mandates. These departments include:

- City of Miramichi Public Works
- City of Miramichi Engineering
- City of Miramichi Fire Department
- Miramichi Police Force
- NB Department of Environment and local government

The City's Director of Engineering provided the following comments:

- "Developer to show net-zero calculations based off changes from existing property/building
- Servicing will likely have to come off McCurdy Street.
- Parking off the side of the building from McCurdy, the three spots closer to Wellington would likely be an issue backing into traffic right beside an intersection. Would need a review completed by a Traffic Engineer for this area of parking. This issue could also extend further into their direct parking of McCurdy based on the engineers' recommendations."

Implications for approval:

- The applicant may need to reconfigure the site's parking layout based on the Traffic Engineer's findings.
- If modifications reduce the number of on-site spaces, the applicant could consider additional mitigation strategies (e.g., off-site parking agreements).
- Approval of the variance should include conditions requiring compliance with the Traffic Engineer's recommendations to ensure pedestrian and vehicular safety.

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Net-zero drainage means that the proposed development should not increase the total volume or rate of stormwater runoff from the site compared to pre-development conditions. This is typically achieved through on-site stormwater management techniques that allow for infiltration, storage, and controlled release of water. Given the urban, downtown setting of the Legion Hall site, space constraints will limit traditional retention ponds or large-scale infiltration areas. Given this, the applicant will need to determine how water volume and flow will be controlled to prevent any increase in runoff impact.

The City of Miramichi Fire Department confirmed that “per the Fire Prevention Act of NB, this project would also require a submission to the Office of the Fire Marshal Plan Review section.”

NB Department of Environment noted that the property is located within Zone C of a “preliminary protected wellfield”, which is not yet officially designated under provincial regulation. The Regional Water Planning Officer stated that the relevant regulation does not apply currently but likely will in the future. In particular, the proposed development will need to observe requirements from the regulation respecting petroleum storage, geothermal heating systems, and municipal servicing.

This means that:

- While no current regulatory constraints apply, future regulations may introduce new requirements.
- The applicant should be aware of potential future restrictions, particularly concerning fuel storage and geothermal energy systems (if under consideration).
- If the wellfield is formally designated, the development may require additional environmental compliance measures in the future.

No other comments were received.

Staff Recommendation

Pursuant to Section 55(1)(b) of the *NB Community Planning Act*, and Section 2.8.2 of the City of Miramichi Zoning By-law, the City of Miramichi Planning Review and Adjustment Committee (PRAC) approves the following variances, subject to the conditions outlined below, to facilitate the development of the proposed Legion Building at 18 McCurdy Street, Miramichi (PID 40521601):

1. A reduced setback from the front property line abutting McCurdy street from 7.6m to 5.5m.
2. A reduced setback from the front property line abutting Wellington street from 15.2m to 5.529m.
3. A reduced setback from the rear property line abutting PID 40194961 from 6.1m to 2.119m.

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4. A reduced setback from the side property line abutting PID 40493322 from 6.1m to 4.927m.
5. A reduced setback from the side property line abutting PID 40493322 from 6.1m to 4.91m.
6. Any on-site parking provided along the lot line abutting McCurdy Street be subject to approval by City of Engineering or Public Works Departments.
 - a. The applicant must submit a Traffic Engineering Report, to the satisfaction of these departments, evaluating the safety and feasibility of parking spaces along McCurdy Street, particularly the three spaces closest to Wellington Street.
7. Further to condition 6, that a variance to the required landscaped open space between the building and McCurdy Street be permitted to allow for no landscaped open space, should parking be permitted in this area by the Departments of Engineering or Public Works.
8. A reduced parking requirement from 88 stalls to a minimum of 17 stalls.

Additional Condition:

9. The applicant must submit a stormwater management plan, demonstrating compliance with net-zero drainage requirements, to the satisfaction of the City's Engineering Department. If in the opinion of the Development Officer substantive site modifications are required to achieve net-zero drainage standards, the applicant must resubmit an application to the City PRAC for reconsideration.

Alternative Options for PRAC Consideration

If the PRAC decides that the proposal does not sufficiently align with the intent of the Municipal Plan or Zoning By-law, or if additional technical assessments are needed to demonstrate the project can meet infrastructure and safety standards, the following alternative actions may be considered:

Alternative Option 1: Table the Application Pending Additional Information

PRAC may defer its decision to request further technical assessments before making a final decision. This approach could allow for a more informed decision while ensuring that potential infrastructure and safety considerations are addressed. Possible items of additional information are outlined in Table 4 below.

Table 4: Technical Assessments for PRAC Consideration

Architectural Renderings & Site Visualization	<ul style="list-style-type: none">• PRAC could request 3D renderings, massing diagrams, or streetscape perspectives to visualize the development's impact on the surrounding neighbourhood.• Require elevation drawings to assess streetscape compatibility and ensure that reduced setbacks do not negatively impact pedestrian flow or sightlines.
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Traffic Study (Engineering Department Review)	<ul style="list-style-type: none">• Require a Traffic Impact Study evaluating safety of McCurdy Street parking spaces, particularly those closest to Wellington Street.• Intersection impacts and potential mitigation strategies.• The availability of alternative parking solutions or shared parking agreements.
Stormwater Management Plan & Net-Zero Drainage Compliance	<ul style="list-style-type: none">• Require the applicant to submit a stormwater management plan demonstrating how the site will achieve net-zero drainage.• Confirmation from the City Engineering Department that the proposed stormwater strategy is viable and compliant with municipal infrastructure capacity.

Alternative Option 2: Deny the Application

PRAC may deny the application if it finds that the proposal:

- Is not desirable for the development of the property.
- Does not align with the general intent of the Municipal Plan or the Zoning By-law.
- Introduces impacts that cannot be reasonably mitigated.

If denied, the applicant would need to redesign the proposal and submit a new variance request with modifications to address concerns. Additional traffic, parking, or stormwater solutions may need to be integrated before reconsideration.

If PRAC decides to deny the variance requests, they must include the reasons for doing so in their motion.

Right to Appeal

The new Assessment and Planning Appeal Tribunal (APAT) is an independent body that hears appeals related to land use planning decisions in New Brunswick. Affected parties who disagree with a planning decision may appeal the subject application. To initiate an appeal, the appellant must file a Notice of Appeal with the Tribunal within:

- 60 days of the decision, or
- 10 days of the posting of a permit.

Once the APAT Chair receives the necessary documentation, a hearing date, time, and location will be set, with at least 14 days' notice provided to all parties. If an appeal is dismissed, the appellant has 7 days to request a reconsideration and reschedule the hearing. Following the hearing, the Tribunal deliberates privately and issues a written decision to all parties. If dissatisfied with the ruling, a party may appeal to the Court of King's Bench for judicial review.

Attachments

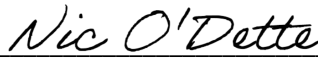
1. Chatham Branch #3 Royal Canadian Legion Subdivision Plan 2014-1
2. Property Location Map
3. Applicant's Submitted Site Plan
4. Applicant's Submitted Floor Plan
5. Site Photos (taken 2025-02-05)

Memo Prepared On: Thursday, February-13-25

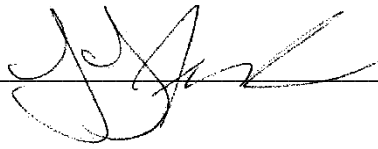
Initial Drafting by:
Alex Hanes
Planner



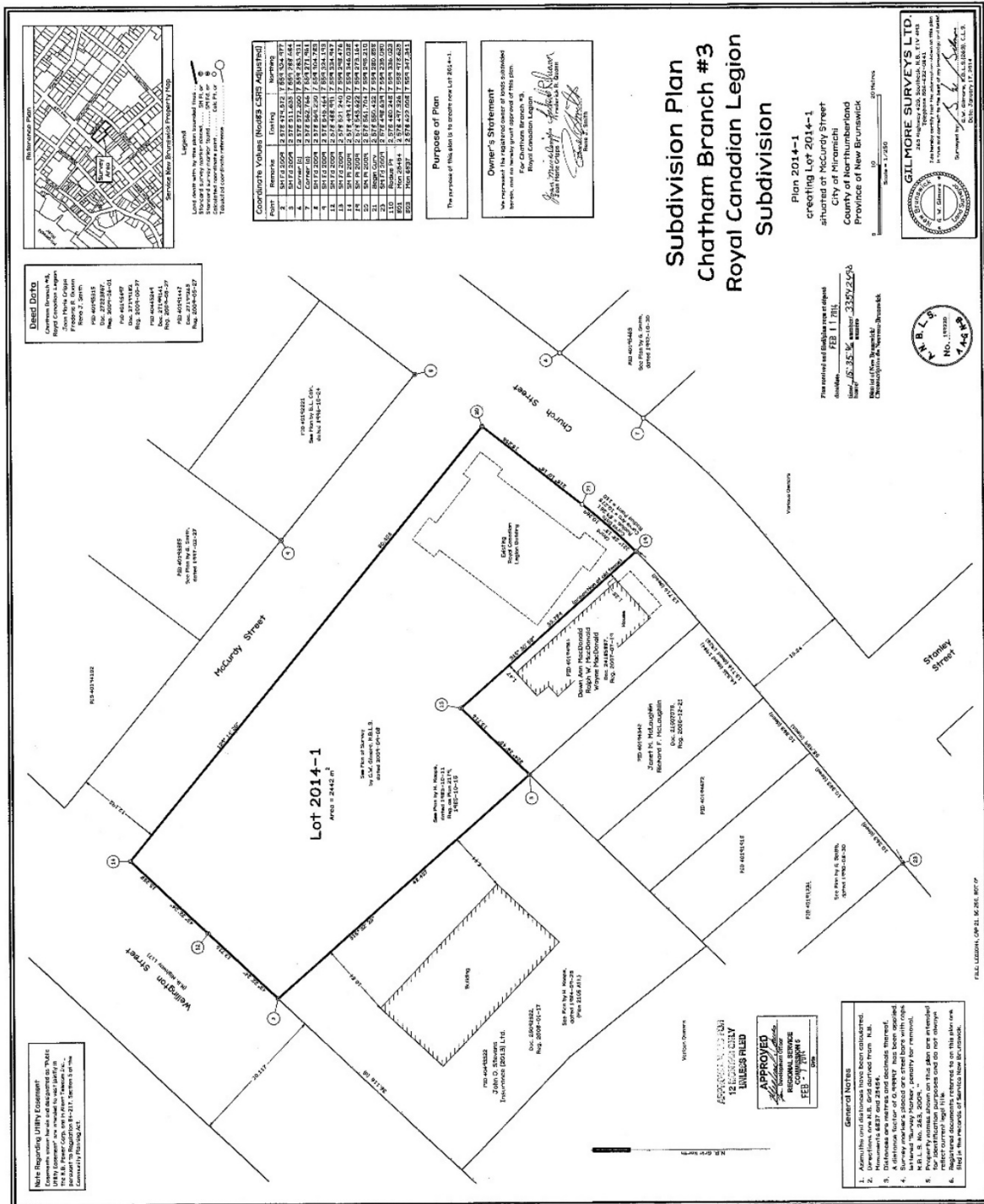
Reviewed by:
Nicholas O'Dette, RPP, MCIP
Planning Services Manager



Prepared Under the Direction of:
Justin Forbes, RPP, MCIP
Planning Director



Attachment 1: Chatham Branch #3 Royal Canadian Legion Subdivision Plan 2014-1

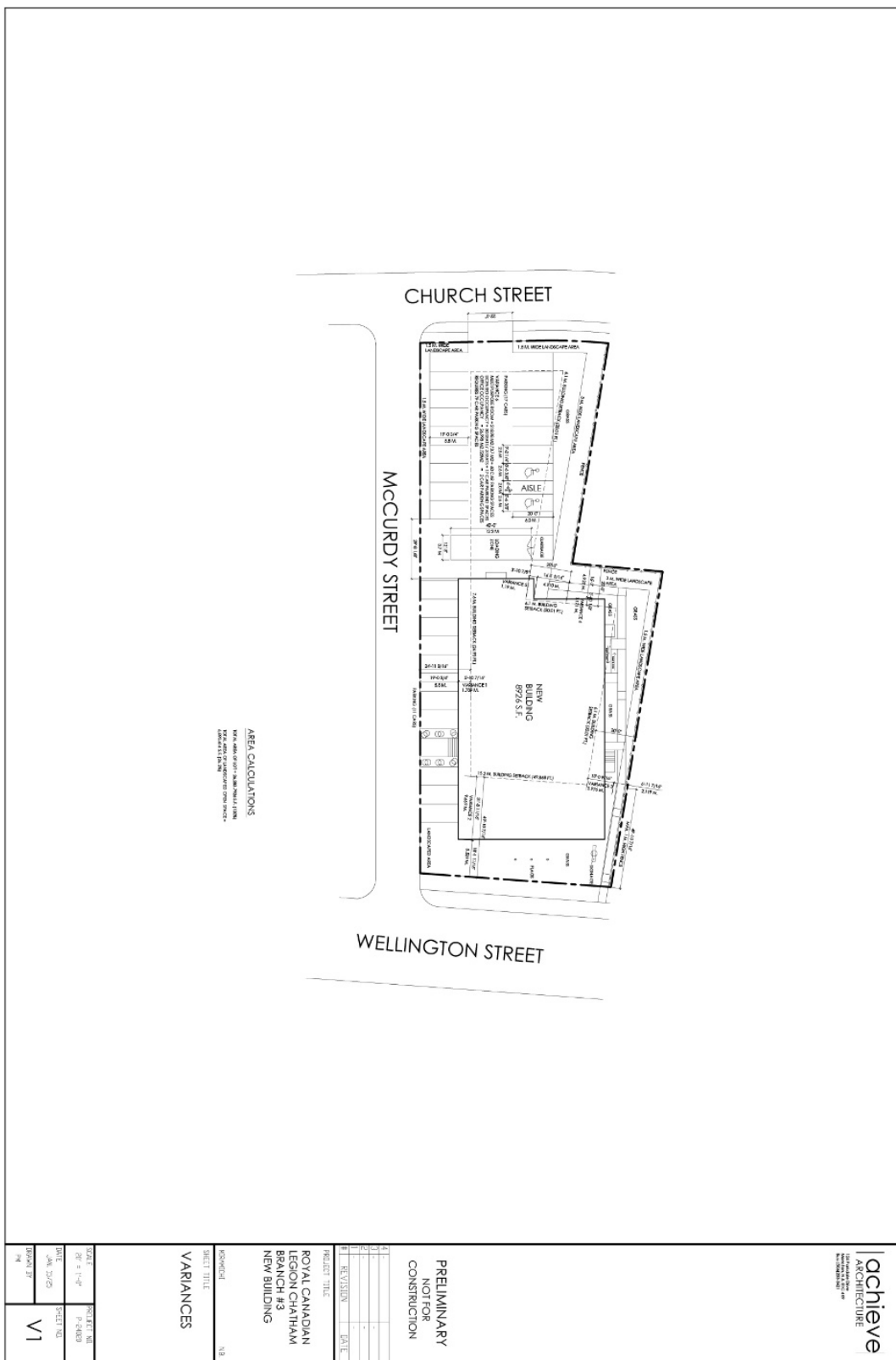


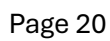
Attachment 2: Property Location Map



Sources: Greater Miramichi Regional Service Commission | Commission de services régionaux du Grand Miramichi; Service New Brunswick | Service Nouveau-Brunswick

Attachment 3: Site Plan Submitted by Applicant





Attachment 5: Site Photos (taken 2025-02-05)

Photo 1: Existing Legion and parking lot viewed from Wellington and McCurdy



Photo 2: Front Entrance of existing Legion from McCurdy.



Photo 3: South East Corner of the property (Church and McCurdy)



Photo 4: Southwest Corner of the property.

