March 13, 2026

City Of St. John's
P.O. Box 908
St. John, NL
A1C 5M2

Mr. Ronnie Sinyard,

Re: 157-163 Water Street – Rear Exterior Wall Condition
City File # CMP2600319

I am writing in response to your letter dated March 03, 2026 regarding the exterior wall condition at 157-163 Water Street. We agree that the rear exterior façade is badly deteriorating and will continue to get worse. We also agree that action must be taken to mitigate the problem and provide a level of public safety. The building is in poor condition.

Attached you will find an application for a Building Demolition Permit. Several other supporting documents are attached including a site plan showing immediate proposed action, site survey, photos of the subject property, photos from the roof remediation in December 2025, reference to your March 3rd correspondence and a structural condition assessment dated November 2024.

Repairs to the building would be futile. The existing superstructure is failing while masonry and concrete wall assemblies, crumble. The roof was damaged in a windstorm in December 2025.

We are proposing to create a temporary hoarding fence, 3 meters from the back of the building and a covered passageway at the breezeway connection to Water Street. This will create a barrier and pedestrian protection should debris fall from the facade. We propose building demolition is the best path forward.

For your review and consideration.

All the best,

[redacted]

Glen Rose
PROJECT AND FACILITIES MANAGER

HOWARD GROUP

The Howard Group
515 Kenmount Road, St. John's NL A1B 4G1
T 709.752.3356 F 709.726.1791
capitalautogroup.ca | howardproperties.ca

ST. JOHN'S

Application for Building Permit

Internal Use Only — SECTION 1

Application Number_____ Property Class_____ Structural Type_____

Application Set Up Information_____

Project Information — SECTION 2

Civic Address 157-163 Water Street Lot #_____

Business Name (if applicable) N/A Project Value Estimate ($) 250K

Purpose of Application — SECTION 3

- ☐ New Construction
- ☐ Extension/Addition
- ☐ Renovation/Alteration
- ☑ Demolition
- ☐ Change of Occupancy
- ☐ Repair

Each new construction project requires the submission of a separate application form

Application Type — SECTION 4

- ☐ Dwelling
- ☐ Apartment/Secondary Suite
- ☑ Commercial Building
- ☐ Patio/Deck
- ☐ Fence
- ☐ Accessory Building
- ☐ Pool/Hot Tub
- ☐ Site Work/Driveway
- ☐ Sign
- ☐ Wood Stove/Fireplace
- ☐ Home Office
- ☐ Other (describe below)

Detailed Description of Proposed work:

Complete demolition of existing building. Demolition contactor to provide detailed demolition plan.
Attached are the site plan and existing photos along with a structural engineering overview. The building superstructure, roof, and full envelope are badly deteriorated. The City of St. John's have also been receiving complaints about falling debris. see attached letter from Building Inspector

Owner Contact Information — SECTION 5

Name Howard Properties / AJNJ Holdings Ltd (Jon Howard)

Address P.O Box 13638 Stn A St. John's, NL Postal Code A1B 4G1

Phone (Home)_____ (Work) [redacted] (Cell)_____

Email Address [redacted]

Note: Name of property owner must match that listed on the City of St. John's Assessment Roll

Applicant Contact Information (if different from owner) — SECTION 6

Name Glen Rose - Project and Facilities Manager, Howard Properties

Address_____ Postal Code_____

Phone (Home)_____ (Work)_____ (Cell) [redacted]

Email Address [redacted]

Contractor/Consultant Contact Information (Optional) — SECTION 7

Name_____

Address_____ Postal Code_____

Phone (Home)_____ (Work)_____ (Cell)_____

Email Address_____

Housing Accelerator Fund (HAF) — SECTION 8

Multi-Purpose Built Rentals Incentives:

- The City of St. John's entered a Housing Accelerator Fund (HAF) Agreement with the commitment to provide incentives to encourage the development of, or conversion to, Multi-Unit Purpose Built Rentals housing projects (PBR). PBR projects are defined as: "Attached multi-unit housing of at least four (4) private dwelling units (with private kitchen, bathroom, and living area[s] for each dwelling unit) built specifically for long-term rental tenure." This will apply to redevelopment projects.

- Eligible applicants/projects include approved projects between August 01, 2024, and December 31, 2026, with at least 75% of the dwelling units designated for long-term residential rental accommodation. This incentive will allow for the exemption of permit fees that include: Building Permit, Plumbing Permit, Electrical Permit, and Development Application and Development Permit Fees. ***Development Agreement and Appeal Fees are not subject to exemption. Eligible fee exemptions apply only to projects approved. Approved projects must be completed with an occupancy permit issued by December 31, 2027, failing which any exempted fees will become immediately payable by the applicant.

Housing Accelerator Fund (HAF) continued — **SECTION 8**

- Applicants are advised that applications will be assessed on a first come first serve basis until December 31, 2026, or until funds have been exhausted, whichever occurs first.

☐ I would like to apply for the Multi-Purpose Built Rental for my Approved Building Project.

Applicant Signature of Agreement — **SECTION 9**

I hereby submit this application and confirm that the information supplied is, to the best of my knowledge, correct. I agree to comply with all City Regulations & By-Laws, agree to develop in accordance with the plans approved by the City of St. John's and not to commence development without applicable written approval and permits from the City of St. John's. In addition, I acknowledge that I have reviewed this application and agree to provide any additional information requested and to pay all applicable fees as noted on the City's fee schedule (www.stjohns.ca). To view these fees, please click on the link below that pertains to your application:

Inspection Services Fees and Rates

Note: Where the applicant and property owner are not the same, the signature of the property owner is required before the application can be accepted for processing.

Applicant Signature [redacted] Date (yyyy-mm-dd) 2026-03-13.

Property Owner Signature [redacted] Date (yyyy-mm-dd) 2026-03-13

Staff Signature _____ Date (yyyy-mm-dd) _____

Privacy Notice — **SECTION 10**

Collection of Personal information via this form is authorized under the Access to Information and Protection of Privacy Act, 2015 and is needed to process your Permit Application. Questions about the collection and use of the information may be directed to the Manager of the Regulatory Services Division, by email: building@stjohns.ca or by phone 709-576-8565.

Please send completed form to:

Inspection Services
3rd floor Annex
10 New Gower Street
P.O. Box 908
St. John's, NL A1C 5M2

For further information:

Phone: 709-576-8565
Fax: 709-576-8160
Email: permits@stjohns.ca

March 3, 2025

AJNJ Holdings Inc.
PO Box 13638 Station A
St. John's NL A1B 4G1

Dear Business Owner:

RECEIVED
MAR 04 2026

RE: **157-163 Water Street – Rear Exterior Wall Condition**
Our File #CMP2600319

An inspection was carried out by the Division of Regulatory Services at the above captioned property on **February 26, 2026** as a result of a complaint being received. This inspection revealed the following deficiencies and/or items requiring corrective action:

1. The exterior façade at the rear of the building is in need of repair and in violation of **Sections 13(c) and 14(a) of the Commercial Maintenance By-Law of the City of St. John's.** All exterior walls are required to be free of any loose objects or materials and be maintained to prevent deterioration due to weather.

You are hereby advised to have **item 1 completed by July 1, 2026**

Failure to comply obligates this Department to take further action (i.e., the City correcting the deficiencies, issuing **tickets per violation** and/or referring the matter for legal action). If deficiencies are corrected by the City, the cost of such work will form a lien against your property until paid (**Section 392(6) or 397(6) of the City of St. John's Act**). If convicted, the maximum fine per deficiency is $5,000.00. Unpaid tickets are **$100.00 each** and will form a lien against your property.

Pursuant to Section 398 of the City of St. John's Act, you may appeal this notice to the St. John's Local Board of Appeal. An appeal must be filed with the Office of the City Clerk within fourteen (14) days of the date of this notice. Please note there is a $115.00 fee (HST included) to file an appeal. This fee is refundable only if an appeal is successful.

We wish to work with you to resolve this matter. Please contact the undersigned if you require any additional information. Thank you for your cooperation.

Sincerely,

[redacted]

Ronnie Sinyard
Senior Building Inspector
(709) 576-8297
rsinyard@stjohns.ca

RWS/llr

Certified Mail – LP 740 645 635 CA

Structural Condition Assessment

157-163 Water Street, St. John's, NL

Issue date: 27-Nov-2024

Inspection date: 25-Nov-2024

Client: AJNJ Holdings

LICENSED PROFESSIONAL ENGINEER
04018
GRANT HORWOOD
[redacted]
SIGNATURE
2024/11/27
DATE
NEWFOUNDLAND & LABRADOR

PROVINCE OF NEWFOUNDLAND AND LABRADOR
pegnl
ENGINEERING PERMIT
N1192
RESILIENT PROPERTY SOLUTIONS INC.
04018
Signature or Member Number (Member-in-Responsible Charge)

TABLE OF CONTENTS

Attachments

1. Objective

The purpose of the Structural Condition Assessment is to observe and report, to the extent feasible, on the structural condition of the building. The report identifies physical deficiencies and structural concerns that would need to be addressed during a full renovation or reconstruction. This report excludes an assessment of the mechanical, electrical, and fire protection systems in the building.

1.1. Definitions

In this document, except where otherwise qualified, the following terms will be defined as follows:

1. Architect, designation reserved by law for a person professionally qualified, examined, and registered by the appropriate governmental board having jurisdiction, to perform architectural services.
2. Engineer, designation reserved by law for a person professionally qualified, examined, and licensed by the appropriate governmental board having jurisdiction, to perform engineering services.
3. "Owner" means the person or company who owns and manages the property (AJNJ Holdings Ltd.).
4. "Contractor" means the company with whom the owner has (or will) entered into a contractual agreement for execution of the Scope of Work for repairs or renovations.
5. "Consultant" means the engineer of record responsible for the detailed design of the work.
6. "PCA" means property condition assessment.
7. Building systems, interacting or independent components or assemblies, which form single integrated units that comprise a building and its site work, such as pavement and flatwork, structural frame, roofing, exterior walls, plumbing, HVAC, electrical, etc.
8. Baseline, the minimum level of observations, due diligence, inquiry/research, documentation review, and preparation of opinions of costs to remedy material physical deficiencies for conducting a PCA as described in this guide.
9. Expected useful life (EUL), the average amount of time in years that an item, component or system is estimated to function without material repair when installed new and assuming routine maintenance is practiced.
10. Field observer, the individual that conducts the walk-through survey.

11. N.B.C.C. means the National Building Code of Canada latest edition.
12. Observation, means the visual survey of items, systems, conditions, or components that are readily accessible and easily visible during a walk-through survey of the subject property.
13. Physical condition, means the physical state of a property, system, component or piece of equipment. Within the context of the assessment, the consultant may offer opinions on the physical condition of the property or systems, components and equipment observed. Such opinions commonly employ terms such as good, fair and poor; though additional terms such as excellent, satisfactory and unsatisfactory may also be used.
14. Good condition, means in working condition and does not require immediate or short-term repairs above an agreed threshold.
15. Fair condition, means in working condition, but may require immediate or short-term repairs above an agreed threshold.
16. Poor condition, means not in working condition or requires immediate or short-term repairs substantially above an agreed threshold.
17. Remaining useful life (RUL), a subjective estimate based upon observations, or average estimates of similar items, components, or systems, or a combination thereof, of the number of remaining years that an item, component, or system is estimated to be able to function in accordance with its intended purpose before warranting replacement. Such period of time is affected by the initial quality of an item, component, or system, the quality of the initial installation, the quality and amount of preventive maintenance exercised, climatic conditions, extent of use, etc.
18. Technically exhaustive, describes the use of measurements, instruments, testing, calculations, exploratory probing or discovery, or other means to discover, or a combination thereof, or troubleshoot physical deficiencies or develop architectural or engineering findings, conclusions, and recommendations, or combination thereof.
19. Walk-through survey, means conducted during the field observer's site visit of the subject property, that consists of nonintrusive visual observations, a survey of readily accessible, easily visible components and systems of the subject property. This survey is described fully in Section 8. Concealed physical deficiencies are excluded. It is the intent of this guide that such a survey should not be considered technically exhaustive. It excludes the operation of equipment by the field observer and is to be conducted without the aid of special protective clothing, exploratory probing, removal or relocation of materials, or testing. It is literally the field observer's visual observations while walking through the subject property.

2. Executive Summary

This building was purchased by AJNJ Holdings Ltd. in 2023 as part of insolvency sale for Pier 8 Properties Development Group. The property is zoned Commercial Downtown Mixed which has a maximum building height of 18m. The Owner has recently completed an interior demolition which has exposed the demising walls and building structure above the basement level. The building was originally constructed as two separate buildings with a brick demising wall acting as the load bearing fire separation. The building structure is a combination of brick and concrete exterior walls with interior steel columns and w-beams. The floor and roof structures are timber joists with tongue and groove boards. The foundation walls are a combination of poured concrete and stone. There was an extension constructed on the back of the building sometime after the original construction which is in very poor condition. The floor structure of this portion of the building is unsafe for occupancy. There appears to have been a change in the front façade of the building sometime after the original building construction. The first floor of building 157 appears to be built-out and infilled with a wood exterior structure.

The general structural condition of the building is poor. There is evidence of significant fire damage on the top floor and roof structure which has not been fully repaired. Most of the floors are structurally sound but there are sections throughout with water damage and deterioration which are unsafe for inspection. Although the floor structure is adequate for general inspection, it would not meet the loading requirements as specified in the N.B.C.C. for office or assembly occupancy. There are several large openings cut in the brick loadbearing walls which we not properly supported and are displaying signs of structural failure. The stair and elevator shafts in the building have reached the end of their useful life.

Due to the age and condition of this building and the structural components that were used at the time of the original construction, it will be difficult to certify this structure to resist the current occupancy and environmental loadings specified in the latest edition of the N.B.C.C. Significant structural upgrades will be required including a new roof structure, upgraded floor structure, wall reinforcement, new lintels, and some new foundations. It would most likely be more economically feasible to demolish this structure and replace it with a new, higher quality, structure that would have a lifespan of 75-100 years.

3. Inspection and Assessment Procedure

3.1. Property Walk-through Survey

Technical assessments are based on visual inspections and non-invasive techniques conducted during the walk-through survey. Most areas of the building were accessible for visual inspection at the time of the walk-through; however, no investigation could be performed on the building footings.

During the site surveys of November 25, 2025, I observed property components, systems, and elements that were easily visible and readily accessible for the purposes of describing, providing an opinion on their apparent physical condition, and identifying significant physical deficiencies. This evaluation did not include preparing detailed calculations, removing materials, operating equipment, or conducting any exploratory probing or testing. This was a nonintrusive visual survey. However, a reasonable attempt at discovery was made. A philosophy of reasonableness prevailed.

Survey procedures consisted of:

a. Walk-around visual survey. All common and service rooms were inspected and all spaces in the building were reviewed; this included all floors, ceilings, walls, and the basement.

b. A visual inspection of the exterior of the building from the ground level, which included the walls, and the general exterior features, cladding, doors and windows.

3.2. Client Provided Information

The walk-through survey was accompanied by the client representative, Glen Rose. The client provided verbal information about the general state of the building, current leaks, fire damage, and potential future long-terms plans for the property.

3.3. Credentials

The walk-through survey and subsequent report were conducted by; Grant Horwood, P.Eng.

3.4. Limitations of this Report

The walk-through survey is a visual, non-destructive inspection only. Notwithstanding any language contained in this report to the contrary, the conditions observed, conclusions drawn, and recommendations made are limited by the accuracy and completeness of the information supplied and the limits imposed by non-destructive investigation.

Unless otherwise indicated, all reviews were of a visual nature only and based on an assessment of the available information. We cannot assume responsibility for:

1. Information that was not provided by the owner
2. The accuracy of information in reports/plans that were provided
3. Items concealed within wall and roof assemblies and therefore not directly visible based on the building surfaces
4. Roof surface
5. Items in areas that could not be or were not accessed

Please note that I did not carry out detailed structural calculations as part of the review. Also, note that the mandate for the review did not include reviews for mould and/or other environmental contaminants however some mold was present in the building at the time of the inspection.

3.4.1. Disclaimer of Liability

No liability shall be accepted because of failure of the report to notify any problems in any area(s) or section(s) of the subject property physically inaccessible for inspection or to which access for inspection is denied by or to the inspector (including but not limited to any area(s) or section(s) so specified by the report).

3.4.2. Disclaimer of Liability to Third Parties

This report is made solely for the use and benefit of the client named on the front of this report. No liability or responsibility whatsoever, in contract or tort, is accepted to any third party who may rely on the report wholly or in part. Any third party acting or relying on this report, in whole or in part, does so at their own risk.

3.4.3. Hazard Materials

A hazardous materials inspection was not completed however one would be recommended if the this building were to be demolished.

4. Property Condition Assessment

4.1. General Physical Condition

The general property consists to two 4 story buildings which are adjoined to adjacent properties on either side. The building setback is 0m from the sidewalk which is compliant with the City regulations for Commercial Downtown Mixed zone. The exterior walls of the building are in fair to poor condition. Significant architectural and structural repairs would be required to the building envelop for protection against water infiltration and thermal protection. There is significant fire damage to the steel roof structure which would need to

be removed and replaced prior to proceeding with any other renovations. The condition of the front façade is relatively good however the structure would need to be analyzed for the current N.B.C.C. specified wind loadings and if the floors were removed, temporary bracing would be required. The rear exterior wall is poured concrete and in fair condition however there are areas of localized deterioration. More testing is recommended on this concrete wall to confirm the concrete strength. A complete renovation of this building would cost significantly more than the value of the current structure which would require the building to meet all the requirements of the latest edition of the N.B.C.C. The existing floor structure would likely need to be reinforced and the stair shafts would need to be replaced. The exterior load bearing brick walls may need to be reinforced with a secondary structure to withstand the current wind loads. The small addition on the rear of the building is in very poor condition and should be removed and/or replaced. The building roof is leaking and there is some water infiltration around the wall openings which has lead to further deterioration of portions of the structure.

4.2. Roof System

4.2.1. Flat Roof

The main flat roof is significantly deteriorated and has reached the end of its useful life.

4.3. Exterior Envelope

4.3.1. Exterior walls

The building's exterior above ground walls are a combination of poured concrete and brick-and-mortar. There is no insulation or weather barrier installed on the building envelope. The exterior walls of building 161-163 are poured concrete and in fair condition. The exterior walls of building 157-159 are brick and mortar up to level 3 and poured concrete on level 4. The brick-and-mortar walls are in poor condition. The window openings on level 2 and higher are large compared to the overall wall area. This configuration does significantly affect the structural integrity of the building to resist wind loads in the brick walls. If this building were demolished, the concrete wall between 163 and 167 could be left in place to protect the adjacent building. The northeast facing wall is brick-and-mortar and is the common wall with 155 Water Street. If the building were demolished, the Owner should consider constructing a new wall against this existing brick and mortar structure to support the new floor and roof structures. The southeast facing wall (back) does have some stress cracks and is exposed to the largest wind load. If the floors were removed during reconstruction or demolition, this wall will need to be laterally supported. The exterior back façade is also displaying signs of localized deterioration. If this wall were to remain in place, core samples should be tested for concrete strength prior to any structural design.

4.4. Windows

4.4.1. Windows

The majority of the windows in the building are in poor condition and have reached the end of their useful life. Most of the window blocking are displaying deterioration and water staining.

4.5. Interior

4.5.1. Walls

The interior partition walls of this building are mostly wood studs and drywall or wallboard. Most of the partition walls were removed and any remaining walls have reached the end of their useful life. These walls are either displaying signs of water damage and deterioration or are already partially demolished.

4.5.2. Ceilings

All ceilings in the building have been removed to expose the floor and roof structure.

4.5.3. Stairs

All existing wood stairs are in poor condition and have reached the end of their useful life.

4.6. Insulation and Vapour Barrier

This building does not have any insulation and vapour barrier.

4.7. Structural

4.7.1. Foundation

The foundation of 163 Water Street is in relatively good condition. The northeast stone rubble foundation wall of 157 Water Street appears to be in relatively good condition however this type of wall is difficult to certify for new structural loadings. Further intrusive investigation would need to be conducted if any new structural loadings were applied to this wall. It is recommended that the owner consider constructing a new structural foundation against this wall to support any new floor and roof loadings.

The foundations supporting the steel columns are not exposed for inspection and cannot be evaluated for future loading unless the slab was removed.

4.7.2. Walls

All of the internal brick and mortar load bearing walls have large openings cut throughout which were not properly reinforced with headers. These openings are displaying structural

cracks and will need to be repaired and properly supported if this building is renovated. The old elevator shaft is constructed of timber walls. This shaft has reached the end of its useful life.

4.7.3. Floors

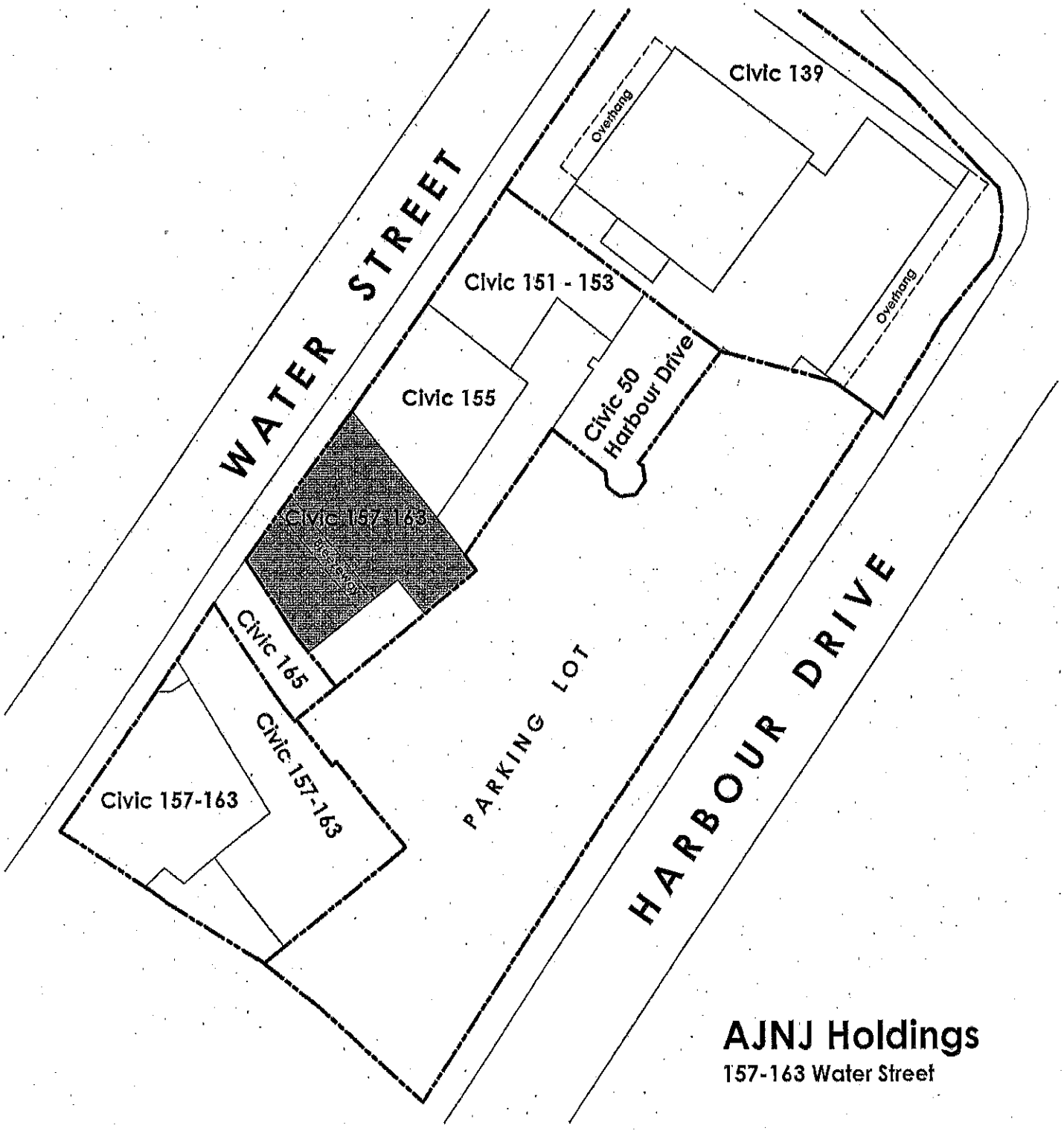
The floor structure throughout consists of timber joists supported on steel w-beams and round steel columns. The steel columns appear to be concrete filled but no distractive testing was conducted. The steel structure is not fire protected. The majority of the floor structure throughout is in fair condition with the exception of some localized water damaged areas. The floor spans are relatively large which is common for a building of this age which will limit the occupancy loadings of this structure. If this building is intended to be brought up to current standards for assembly or office occupancies, the floor structure will need to be reinforced with additional support beams.

4.7.4. Roof

The main flat roof structure is in very poor condition and will not meet the current environmental loads for St. John's, NL. The steel beams supporting the roof appear to be warped from fire exposure. This roof and structure will need to be completely replaced before this building can be occupied. This structure will need to be completely engineered including the support system to the bearing walls and columns and columns.

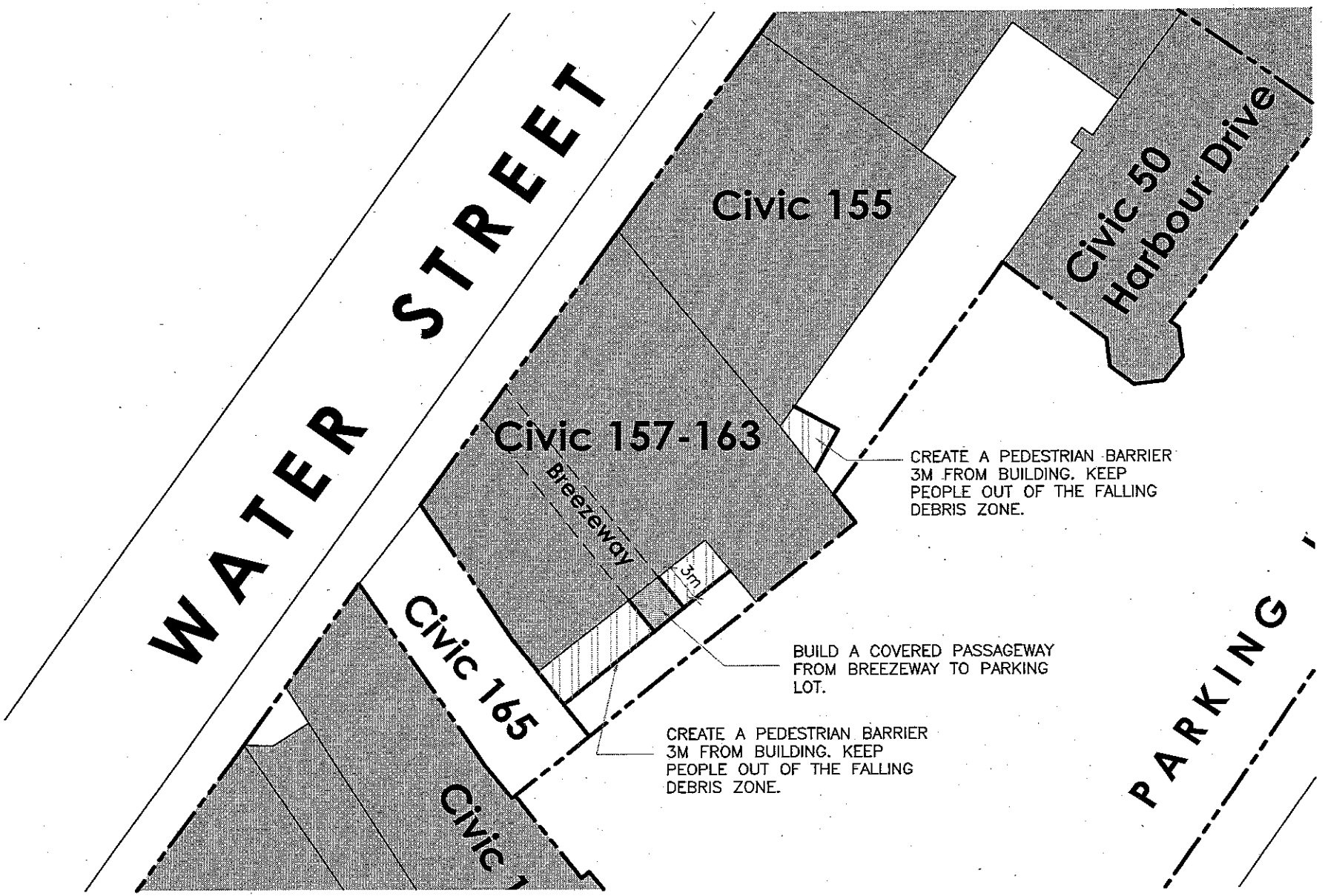
5. Conclusion

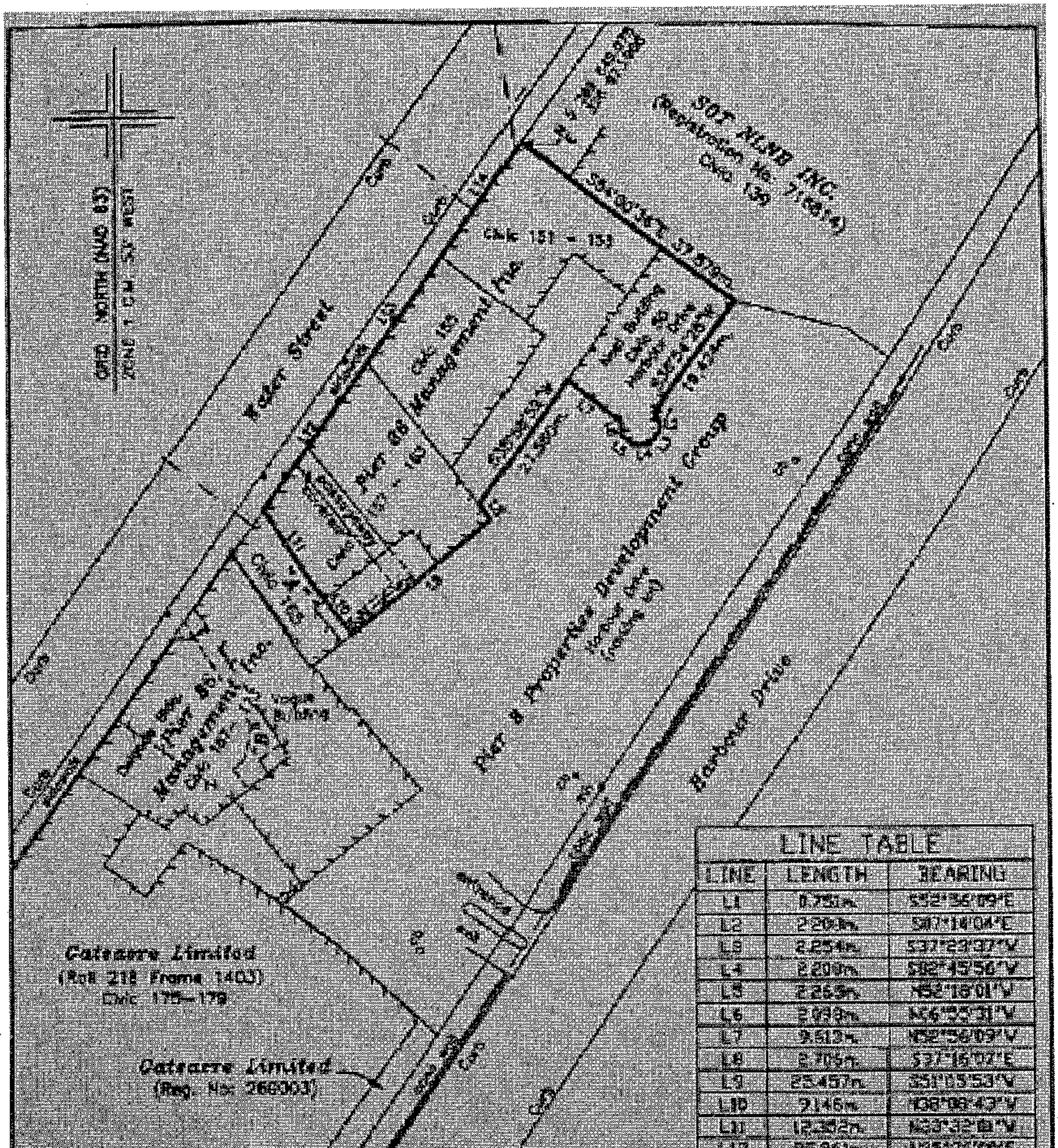
The general structural condition of the building is poor. It is evident that this building was exposed to a fire sometime in the past and was not properly repaired. The exterior envelop of the building has reached the end of its useful life and has been this way for an extended period of time which has led to further environmental damage and deterioration. Due to the amount of current deterioration of the existing components in this building, achieving an acceptable air quality for occupancy may be difficult and should be considered for the refurbishment option. Restoring this building to an acceptable condition would require a significant engineering and construction effort. In my opinion, there are no structural components that are worth restoring except for the common walls between 165 and 155 Water Street. Consideration should be given to demolishing this structure and reconstructing a new building that would be compliant with the latest energy and environmental standards.



AJNJ Holdings

157-163 Water Street


WATER STREET
Civic 155
Civic 50
Harbour Drive
Civic 157-163
Breezeway
3m
Civic 165
Civic
CREATE A PEDESTRIAN BARRIER 3M FROM BUILDING. KEEP PEOPLE OUT OF THE FALLING DEBRIS ZONE.
BUILD A COVERED PASSAGEWAY FROM BREEZEWAY TO PARKING LOT.
CREATE A PEDESTRIAN BARRIER 3M FROM BUILDING. KEEP PEOPLE OUT OF THE FALLING DEBRIS ZONE.
PARKING



LINE TABLE		
LINE	LENGTH	BEARING
L1	0.751m.	S52°36'09"E
L2	2.209m.	S07°14'04"E
L3	2.254m.	S37°23'37"W
L4	2.209m.	S82°45'56"W
L5	2.265m.	N52°18'01"W
L6	2.098m.	N56°53'31"W
L7	9.513m.	N52°56'09"W
L8	2.705m.	S37°16'07"E
L9	25.457m.	S51°03'53"W
L10	9.146m.	N38°08'43"W
L11	12.352m.	N33°32'01"W
L12	25.261m.	N35°36'00"E
L13	16.370m.	N55°28'43"E
L14	19.498m.	N05°28'45"E

"A" – A.B. Harris (Butchers) Incorporated
(Roll 1763 Frame 2084) Civic 165

"B" – Location of former NF. Power easement for a conduit

Area = 0.?950 ha.

— Fence Line
— Parking Meter
— Pole
— Guy Wire
— (cb) Catch Basin
— (mh) Manhole

All Distances are Horizontal Ground Distances and Metric.
Scale Factor of 0.999906 used in co-ordinate computations.

Reference Monument (NAD83)
95G0007 N 5 269 664.058m
E 327 061.869m.

Aubrey K. Burt Surveys Ltd. Newfoundland Land Surveyor

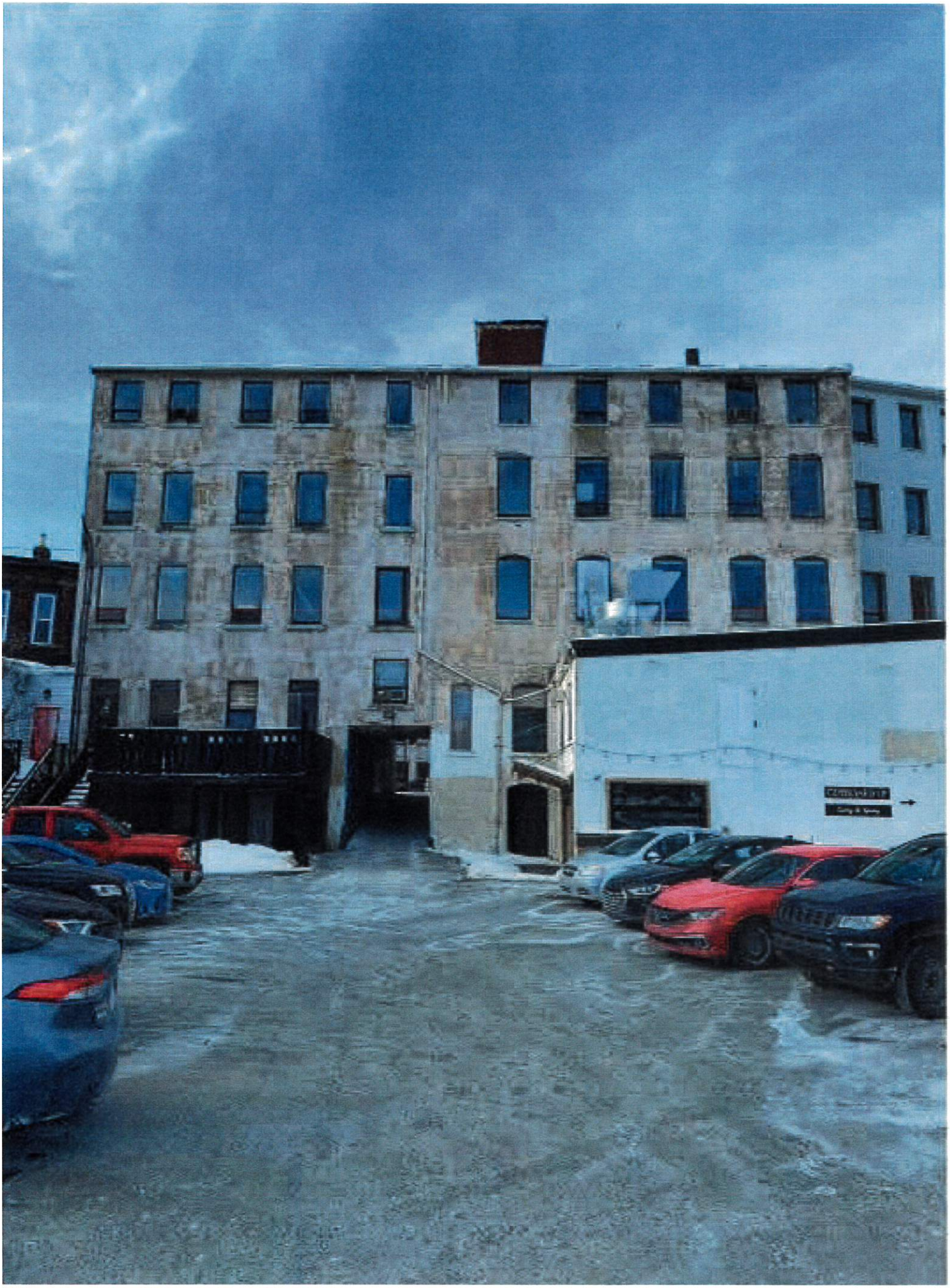
331 Indian Meal Line
P.O. Box 1093, Torbay, NL, A1K 1K7
Email: aubrey@akbsurveyors.nf.net

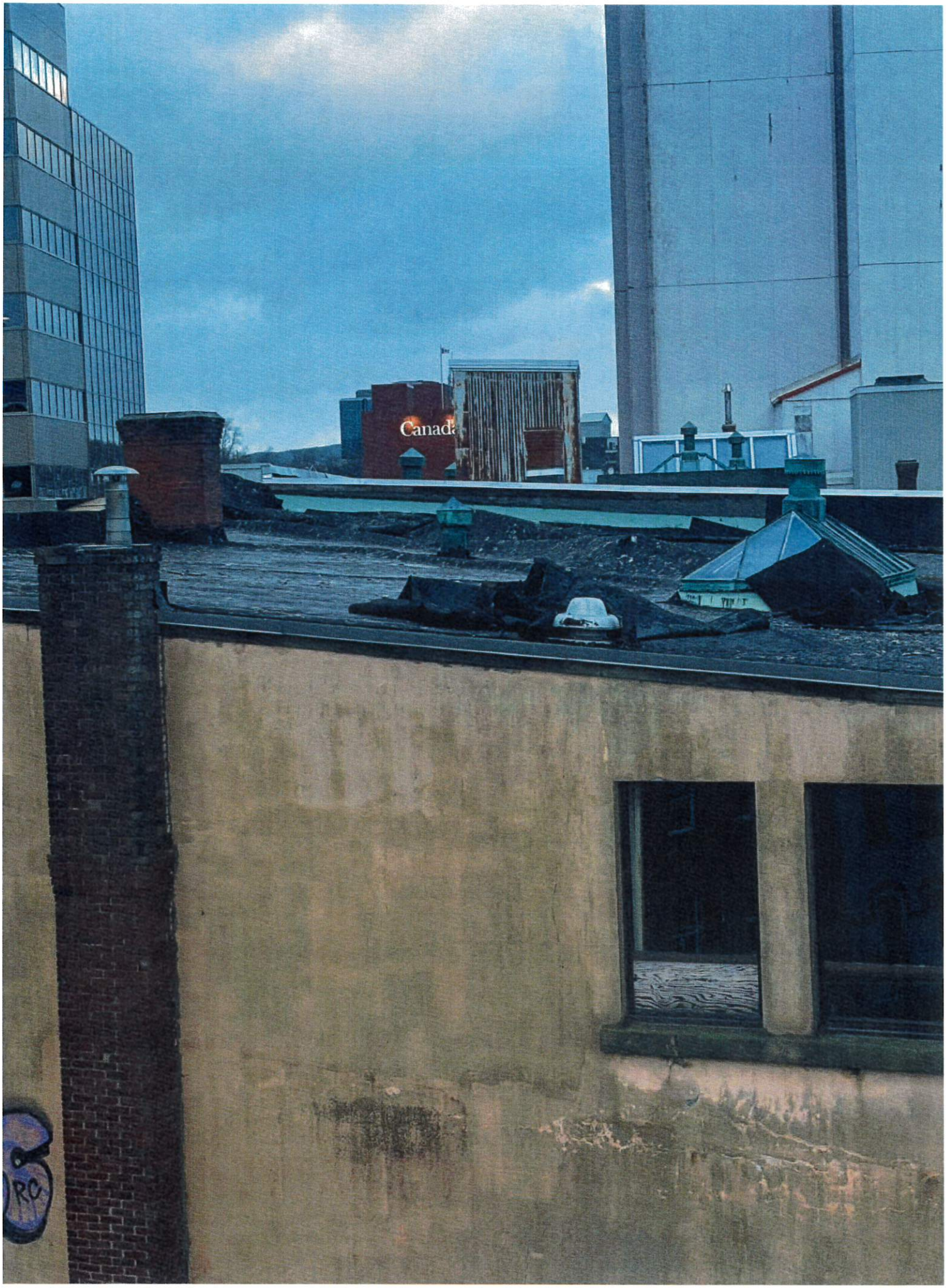
Torbay (709) 437-1088
St. John's (709) 738-3363
Facsimile (709) 437-1084

Aubrey K. Burt — Newfoundland Land Surveyor — Province of Newfoundland

Client: **Pier 66 Management Inc.**
Location: Water Street, St. John's, NL

Scale: 1 : 750	Date: September 14, 2018
Surveyed By: A.B. P.M. H.T. M.S.	Job No.: 2018-395




Canada

PuroClean
PuroClean
PuroClean

FLYNN
NCY SERVICE
INTENANCE
5-6566
nies.com
COVERED COAST TO CO