

February 23, 2022

**2479281 Ontario Inc.**

**Mr. Bobby Tariwal**

34 Radial Street

Brampton, ON L6Y 5K7

File: 20-1028

Dear Mr. Tariwal;

**Re: Commercial Function Assessment, Market Related Response  
Proposed Development, 265 Edinburgh Road North, Guelph**

The following provides a response to the City of Guelph Planning Department market related comments provided via email to GSP Group Inc. July 12, 2021 regarding the Ward Land Economics Inc. (“WLE”) report titled *“Commercial Function Assessment, Proposed Medium Density Residential and Ancillary Convenience Commercial Development, 265 Edinburgh Road North, City of Guelph”* dated November 2020 (the “WLE Commercial Function Study”). This response also addresses the commercial component of the revised site plan for the proposed development of 265 Edinburgh Road North (the subject “Site”).

**In summary and as detailed below, with the revised site plan for 265 Edinburgh Road North, the reduced amount of commercial space proposed is not significantly different and the convenience and service oriented commercial function remain unchanged. The updated commercial development information in the market area and the revised site plan for 265 Edinburgh Road North do not change the analysis, findings, and conclusions of the WLE Commercial Function Study. Based on the findings of the WLE Commercial Function Study, a redesignation and rezoning of the Site to permit Medium Density Residential with a convenience commercial component is justified.**

The City of Guelph Planning Staff advised of a recent development application regarding 111-193 Silvercreek Parkway N and a resubmission development application regarding 47-75 Willow Road. The development proposals and retail commercial market implications are summarized below.

**111-193 Silvercreek Parkway N (Starlight Group Property Holdings Inc.)**

Since the date of the WLE Commercial Function Study, the City received an application for a High Density Residential development at 11-193 Silvercreek Parkway N, located at the northeast quadrant of Silvercreek Parkway N and Willow Rd. Most of the site is occupied by the Willow West Mall anchored by a No Frills supermarket and a Leons furniture store among other retail and service uses. High Density Apartments are proposed to be added as a permitted use on the site. Two six storey apartment buildings are proposed with 605 sq.m. (approximately 6,500 sq.ft.) of commercial space.

The existing retail commercial space in Willow West Mall was accounted for in the WLE Commercial Function Study. The proposed 605 sq.m. (approximately 6,500 sq.ft.) of commercial space on the site represents an increase of less than 1% to the existing supply of almost one million square feet of retail commercial space in the market area. The amount of proposed commercial space is not significant in the market context and therefore does not change the analysis, findings, and conclusions of the WLE Commercial Function Study.

#### **47-75 Willow Road (Willow Court Ltd.)**

The WLE Commercial Function Study accounted for the proposed redevelopment of Willow Plaza at 47-75 Willow Rd with 130 apartments in two 6-storey buildings and approximately 1,860 sq.m. (20,000 sq.ft.) of ground floor commercial space. Since the date of the WLE Commercial Function Study, a revised redevelopment application with minor modifications was submitted to the City in May 2021 and the Zoning By-law amendment was recommended for approval in February 2022.

With the revised application for 47-75 Willow Rd, the number of residential units was reduced from 130 to 115 and the proposed commercial space was reduced from 1,981 sq.m. to 1,748 sq.m. (approximately 21,000 sq.ft. to 18,800 sq.ft.). Compared with the existing supply of retail commercial space in the market area of almost one million square feet, the revised amount of commercial space proposed represents a very minor reduction of only 0.2% (233 sq.m. or 2,200 sq.ft.) of commercial space in the market area. The reduced amount of commercial space is not significant in the market context and therefore does not change the analysis, findings, and conclusions of the WLE Commercial Function Study.

#### **Subject Site: 265 Edinburgh Road N (479281 Ontario Inc.)**

Since the date of the WLE Commercial Function Study, the site plan for 265 Edinburgh Rd N has been revised. With the revised site plan, the amount of commercial space has been reduced from approximately 440 sq.m. to 189 sq.m. (approximately 4,730 sq.ft. to 2,035 sq.ft.), among other revisions.

- Based on the WLE Commercial Function Study market assessment, the reduced amount of commercial space proposed on the Site (189 sq.m. or 2,035 sq.ft.) is supported in the market.
- Compared with the existing supply of retail commercial space in the market area of almost one million square feet, the revised amount of commercial space on the Site represents a very minor reduction of only 0.3% (250 sq.m. or 2,695 sq.ft.) of commercial space in the market area.
- The single use/day care is no longer proposed on the Site. Rather than one use on the Site, the revised site plan with 189 sq.m. (2,035 sq.ft.) of commercial space provides an opportunity to accommodate more than one (i.e. 2 to 3+) convenience and/or personal service uses to help serve residents of the Site and the market area.

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- With the revised site plan, the function of the commercial space proposed on the Site remains unchanged. As described in the WLE Commercial Function Study, the proposed commercial space on the Site is intended to have a convenience and service oriented function with convenience and service oriented uses, several of which are permitted on the Site.

Based on the revised site plan, the reduced amount of commercial space proposed on the Site is not significantly different and the convenience and service oriented commercial function remain unchanged. Therefore, the analysis, findings, and conclusions of the WLE Commercial Function Study remain unchanged.

In summary, accounting for the updated commercial development information and the revised site plan for 265 Edinburgh Rd N, the analysis, findings, and conclusions of the WLE Commercial Function Study remain unchanged. As detailed and summarized in the WLE Commercial Function Study;

*“In summary, there are several market indicators which demonstrate a lack of need for the Service Commercial designation and zoning of the Site including: long term vacancy of the Site, lack of population on adjacent lands, large supply of retail commercial space in the market area, and low population growth in the market area, among other indicators.”*

*The proposal entails an appropriate redevelopment of a vacant Site within a built-up area of the City. This is consistent with the Official Plan 9.3.d) goal to provide for higher densities of residential development in an appropriate location. The proposal is also consistent with Official Plan policy Section 9.4.2 and the components of a Commercial Function Study.*

*Based on the findings of the Commercial Function Study, a redesignation and rezoning of the Site to permit Medium Density Residential with a convenience commercial component is justified.”*

If you have any questions regarding this response, please call me at 416-543-8003 or email me at [mward@wleconsulting.com](mailto:mward@wleconsulting.com).

Yours very truly,

**Ward Land Economics Inc.**



Mimi Ward, PLE, MCIP, RPP.  
President