



urban  
Metrics

# Retail Market Impact Analysis

9094 Regional Road 25

Halton Hills, Ontario

Prepared for Halton Hills One Limited Partnership

April 2, 2026



---

Halton Hills One Limited Partnership

This document is available in alternative formats upon request by contacting:  
info@urbanMetrics.ca  
416-351-8585 (1-800-505-8755)



urbanMetrics inc.  
15 Toronto St, Suite 602  
Toronto ON M5C 2E3  
Tel: 416-351-8585  
urbanMetrics.ca

April 2, 2026

Halton Hills One Limited Partnership  
C/O Mr. Michael Mendes  
Vice President, Development  
75 Tiverton Court  
Markham, Ontario, L3R 4M8

Dear Mr. Mendes:

**RE: Retail Market Impact Analysis – 9094 Regional Road 25 (Halton Hills, Ontario)**

urbanMetrics inc. is pleased to submit this Retail Market Impact Analysis in support of your proposed development at 9094 Regional Road 25 in Halton Hills, Ontario. This report demonstrates that the growing market for retail goods and services in Halton Hills and Milton can support the introduction of the commercial space in your proposed development without negatively impacting the function of existing commercial areas.

The analysis herein demonstrates adequate market support for this proposal, confirms that any long-term market impacts created by the proposed development are negligible, demonstrates that the proposed development will not impact the planned supermarkets in the Vision Georgetown Plan Area, and provides Town planning staff with the confidence to make an informed decision on the application.

It has been our pleasure to complete this report on your behalf. Please contact us if you have any questions or concerns.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "D. R. Annand".

Douglas R Annand PLE  
Partner  
**urbanMetrics inc.**

A handwritten signature in black ink, appearing to read "Tywen Thomas".

Tywen Thomas, MSc. PLE  
Associate Partner  
**urbanMetrics inc.**

# Contents

|  |           |
|--|-----------|
| <b>Executive Summary .....</b>               | <b>3</b>  |
| <b>1 Introduction &amp; Background .....</b> | <b>5</b>  |
| 1.1 Purpose.....                             | 5         |
| 1.2 Work Plan .....                          | 5         |
| 1.3 Proposed Development .....               | 7         |
| 1.4 Policy Context .....                     | 8         |
| <b>2 Location &amp; Access .....</b>         | <b>10</b> |
| 2.1 Surrounding Land Uses.....               | 10        |
| 2.2 Transportation Network .....             | 12        |
| 2.3 Site Plan Considerations.....            | 13        |
| <b>3 Market Area .....</b>                   | <b>14</b> |
| 3.1 Market Area Delineation .....            | 14        |
| 3.2 Current Population .....                 | 15        |
| 3.3 Population Growth.....                   | 16        |
| <b>4 Supply Analysis .....</b>               | <b>20</b> |
| 4.1 Inventory of Existing Facilities .....   | 20        |
| 4.2 Proposed Developments .....              | 23        |
| <b>5 Expenditure Potential .....</b>         | <b>25</b> |
| 5.1 Population & Income.....                 | 25        |
| 5.2 Expenditure Potential by Category .....  | 28        |
| <b>6 Market Opportunity .....</b>            | <b>31</b> |
| 6.1 Expenditures in the Market Area.....     | 31        |
| 6.2 Inflow .....                             | 32        |
| 6.3 Residual Market Calculation .....        | 33        |
| 6.4 Sales Transfer Estimates.....            | 34        |
| <b>7 Conclusions .....</b>                   | <b>40</b> |
| 7.1 Residual Market Opportunity.....         | 40        |
| 7.2 Sales Transfers .....                    | 40        |
| 7.3 Market Impacts .....                     | 41        |

|           |                                       |           |
|-----------|---------------------------------------|-----------|
| <b>A1</b> | <b>Retail Expenditure Inputs.....</b> | <b>43</b> |
| <b>A2</b> | <b>Peer Review Response.....</b>      | <b>47</b> |

## Figures

|   |    |
|---|----|
| Figure 1: Proposed Site Statistics.....   | 7  |
| Figure 2: Proposed Site Plan .....  | 8  |
| Figure 3: Subject Site Location - Official Plan Schedule A-17.....              | 10 |
| Figure 4: Subject Site Location .....   | 11 |
| Figure 5: Subject Site & Transportation Network .....                           | 12 |
| Figure 6: Market Areas Map.....   | 15 |
| Figure 7: 2021 Census and 2025 Population Estimate .....                        | 16 |
| Figure 8: Primary Market Area Population Growth .....                           | 17 |
| Figure 9: Active Residential Development Applications.....                      | 18 |
| Figure 10: Projected Market Area Population.....                                | 19 |
| Figure 11: Market Area Large Format GM Retailers.....                           | 20 |
| Figure 12: Market Area Commercial Centres/Plazas.....                           | 22 |
| Figure 13: Commercial Development Pipeline.....                                 | 24 |
| Figure 14: Market Area per Capita Incomes - 2021 Census.....                    | 25 |
| Figure 15: Provincial Average Base Year Per Capita Expenditures.....            | 26 |
| Figure 16: Market Area Base Year Per Capita Expenditures.....                   | 27 |
| Figure 17: Primary Market Area Expenditure Potential by Category .....          | 28 |
| Figure 18: Secondary Market Area Expenditure Potential by Category .....        | 29 |
| Figure 19: Total Market Area Expenditure Potential .....                        | 30 |
| Figure 20: Resident Expenditures in the Market Area .....                       | 31 |
| Figure 21: Resident & Inflow Expenditures .....                                 | 33 |
| Figure 22: Incremental Market Growth Projections.....                           | 34 |
| Figure 23: Market Area GM Sales Transfer Impacts – Selected Periods .....       | 36 |
| Figure 24: Market Area Supermarket Sales Transfer Impacts – Selected Periods... | 39 |
| Figure 25: Capture Rate Calculations.....                                       | 43 |
| Figure 26: Inflow Calculations.....   | 44 |
| Figure 27: GM & WMC Inflow Assumption Analysis .....                            | 45 |
| Figure 28: Regression Equations.....  | 46 |

# Executive Summary

---

- urbanMetrics Inc. has completed a Retail Market Demand & Impact Analysis to assess whether the proposed commercial development at 9094 Regional Road 25 can be supported by market growth and whether it would adversely impact the function of existing commercial areas in Halton Hills and Milton.
- The proposal includes approximately 287,000 square feet of commercial space, anchored by an approximately 167,100 square foot large-format General Merchandise retailer, as well as future Employment Area lands.
- The site's location, at Regional Road 25 and Fifth Side Road, in proximity to Highway 401, gives it regional-scale commercial reach while also serving employees in nearby employment areas. With no competing commercial nodes in the immediate vicinity, the site fills an evident locational void for regional-serving retail north of Highway 401.
- We have delineated a Primary Market Area and Secondary Market Area that are projected to experience significant residential growth of more than 59,300 and 17,000 residents by 2037, respectively. Current per-capita spending levels and strong population growth generate substantial increases in retail expenditure potential across all categories.
- With only four large-format GM retailers in the Primary Market Area, local residents are relatively underserved in this retail category, and the presence of more than 20 options in neighbouring municipalities is likely causing a considerable outflow of household expenditures to those locations in neighbouring municipalities.
- General Merchandise expenditures in the Primary Market Area are projected to increase from \$393.9M (2025) to \$865.0M (2037) driven by population growth and increased local capture rates.
- Between 2025 and 2037, a growing population, increased local capture, and higher inflow is projected to increase total Primary Area expenditures by more than 1 billion. Within this total, the GM category alone is expected to grow by some \$470.9M, providing ample capacity to support a new large-format entrant while enabling existing stores to maintain and grow their performance.

- The remaining 119,900 square feet of proposed smaller commercial units will primarily serve employees and pass-by traffic and, at this scale, is unlikely to materially impact existing neighbourhood- or community-scale commercial centres.
- We have conservatively assumed that this new store will open at typical warehouse membership club performance levels of \$2,060 per square foot. The resulting analysis shows this would result in only minor short-term impacts (-2%) on existing major GM retailers, well below the 10-15% threshold typically used in municipal retail impact review.
- Impacts are short-lived, with existing operators projected to return to baseline performance levels by 2031, benefitting thereafter from market growth. By 2037, existing GM retailers are projected to achieve 14% to 22% performance growth above 2025 levels, even with the new entrant in place.
- The proposed development addresses a documented gap in the regional GM retail network, reduces expenditure leakage, and supports Halton Hills' long-term commercial structure and employment objectives.
- With the introduction of another large-format GM retailer in the Primary Market Area, it is reasonable to expect some portion of current Supermarket & Grocery Spending to transfer to the General Merchandise Category.
- We expect there to be a 5% transfer of Supermarket & Grocery sales to the proposed development in 2028 that declines over time. This transfer is largely offset by market growth and is estimated to cause a 3% short-term decline in performance levels at existing major food store brands, and is not sufficient to negatively impact the viability of planned supermarkets as part of the Vision Georgetown Secondary Plan Area.

# 1 Introduction & Background

---

## 1.1 Purpose

urbanMetrics has been retained by Halton Hills One Limited Partnership (“the proponent”) to conduct a Retail Market Demand and Impact Analysis in support of Official Plan and Zoning By-law amendment applications to advance a commercial and industrial development (“the proposed development”) on a property referred to herein as 9094 Regional Road 25 (“the Subject Site”) in the Town of Halton Hills, Ontario.

The Town of Halton Hills requires this study to assess future market demand for the proposed retail uses and to evaluate the potential impacts of introducing these retail uses on the commercial function of existing commercial areas within the Town, with a particular focus on large-format General Merchandise retailers and major supermarket brands, both of which often function as the anchors of larger commercial nodes and underpin the retail commercial hierarchy.

## 1.2 Work Plan

The following work program was completed in preparing this Retail Market Demand and Impact Analysis:

### 1. Site Suitability Evaluation

We examined the Subject Site and proposed commercial areas to assess their suitability for retail/service and related uses, focusing on their compatibility with surrounding land uses and their accessibility to the market they are expected to serve. While specific tenants have not been identified, we have assumed that a mix of Food Store Retail (FSR) and Non-Food Store Retail (NFSR) facilities will occupy most of the proposed commercial space.

### 2. Market Area Delineation

We delineated a Market Area that is expected to be served by the proposed retail/service space. This area was divided into zones to reflect variations in income, expenditure levels, and expected consumer spending patterns.

### 3. Inventory of Existing and Proposed Competition

Within the Market Area, we inventoried existing FSR and NFSR facilities, with particular focus on the Primary Zone from which the project would draw most of its sales. We also identified other planned or proposed retail projects through discussions with planning staff and secondary research that would be competitive with the subject proposal.

### 4. Market Area Characteristics

We compiled data on population, income, and retail expenditure levels for each zone using Statistics Canada and municipal sources. Current and future population and expenditure forecasts were prepared for 2025 (base year), 2028 (first year of operation), 2031 (stabilization) and 2037 (long-term horizon).

### 5. Market Opportunity Analysis

We conducted a residual market analysis to estimate the potential demand for FSR and NFSR facilities. This included:

- Estimating the existing and future Market Area shares for the different types of retail expenditures.
- Forecasting opportunities to increase local capture rates and reduce expenditure outflow.
- Calculating net residual potential in each store category.
- Estimating any potential sales transfers from existing commercial centres where relevant; and
- Identifying inflow from employees working at the proposed on-site employment uses, and visitors from outside the Market Area.

### 6. Impact Evaluation

We assessed the potential impacts of the proposed retail facilities (and other planned projects) on existing commercial centres, focusing on their ability to maintain their planned function and role within the Market Area hierarchy.

### 7. Report Preparation

This report was prepared to document the findings of the above analysis, summarizing the results and conclusions.

## 1.3 Proposed Development

The proposed development comprises four single-storey buildings with 4 commercial units, totalling approximately 287,000 square feet of gross leasable area (“GLA”), in addition to a gas station kiosk of approximately 228 square feet, and 20.55 acres (8.32 hectares) of Future Employment Area. The distribution of this space in each of the buildings is shown in Figure 1.

**Figure 1: Proposed Site Statistics**

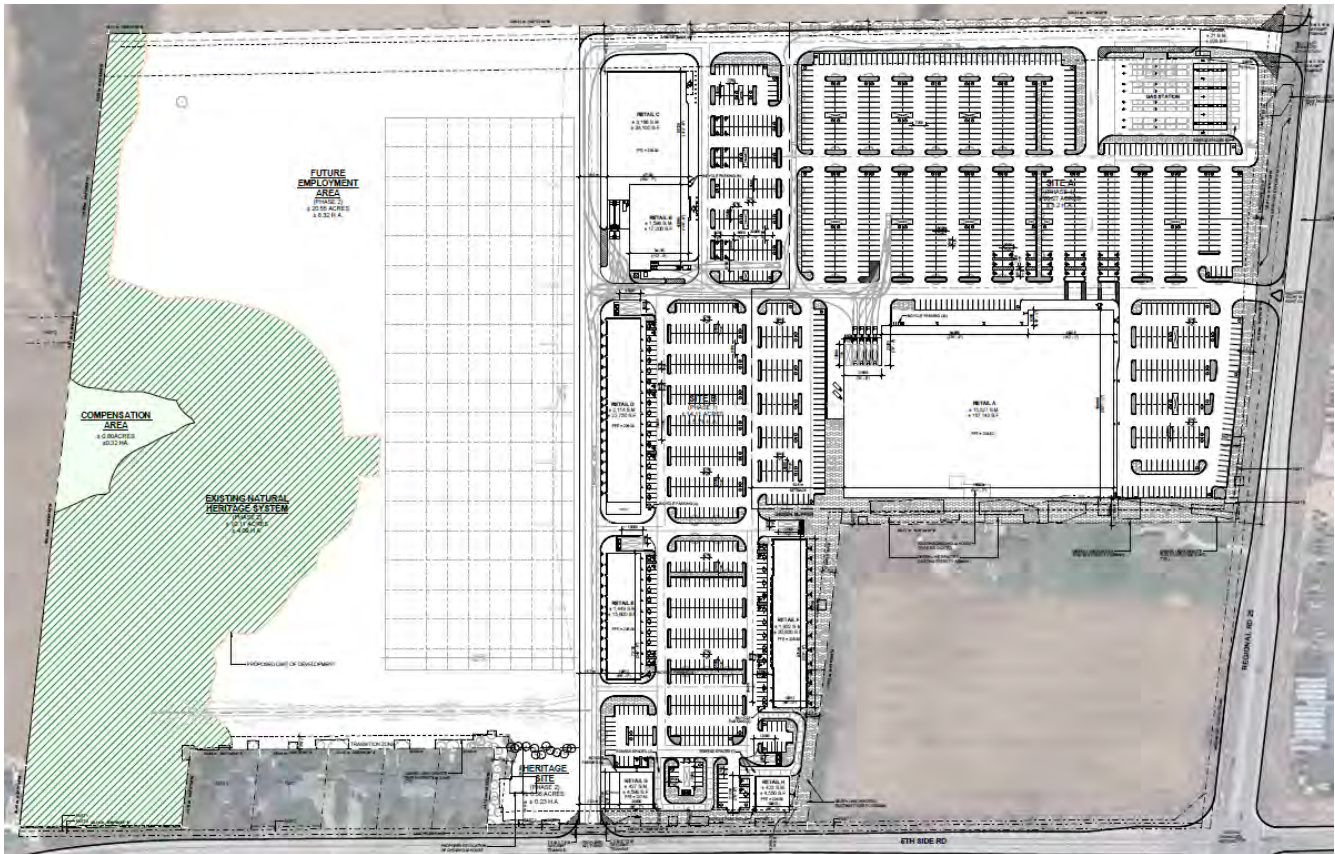
| Retail/Service Commercial                            |
|--|
| A: 167,140 ft <sup>2</sup> (15,527 m <sup>2</sup> )  |
| B: 17,200 ft <sup>2</sup> (1,598 m <sup>2</sup> )    |
| C: 34,100 ft <sup>2</sup> (3,168 m <sup>2</sup> )    |
| D: 22,750 ft <sup>2</sup> (2,114 m <sup>2</sup> )    |
| E: 15,600 ft <sup>2</sup> (1,449 m <sup>2</sup> )    |
| F: 20,800 ft <sup>2</sup> (1,932m <sup>2</sup> )     |
| G: 4,590 ft <sup>2</sup> (427m <sup>2</sup> )        |
| H: 4,550 ft <sup>2</sup> (423m <sup>2</sup> )        |
| Kiosk: 228 ft <sup>2</sup> (21 m <sup>2</sup> )      |
| <b>286,958 ft<sup>2</sup> (26,659 m<sup>2</sup>)</b> |

SOURCE: Turner & Fleischer Architects

The proposed development concentrates most of the commercial space in one larger building of approximately 167,140 square feet. This building is intended to function as a large-format General Merchandise (“GM”) store. The remaining smaller commercial units, ranging from 4,550 square feet to 34,100 square feet have the potential to be demised and will likely be tenanted by a variety of retail and service uses.

As shown in Figure 2, the proposal identifies three entrances to the site. Two entrances, including a signalized intersection, will be located off Regional Road 25 north of the intersection with 5<sup>th</sup> Side Road. The remaining entrance will be via 5<sup>th</sup> Side Road west of the intersection with Regional Road 25.

Figure 2: Proposed Site Plan



SOURCE: Turner Fleischer Architects

## 1.4 Policy Context

Under the Town of Halton Hills Official Plan, 2024 (“the OP”), the Subject Site is designated as a Rural-Agricultural area. However, the Subject Site is also located within a Future Strategic Employment Area, as illustrated in Figure 3 in the subsequent section. The purpose of these areas is to protect lands adjacent to existing employment areas that are best suited for employment uses beyond the current OP’s planning horizon. This would include the subject site.

To permit the proposed development, an expansion of the urban boundary and the redesignation of the site from its current Rural-Agricultural designation are required. Section G2.3 of the OP provides that expansion of the urban boundary may be considered provided that:

- a) the expansion area serves as a logical extension to the existing built-up area
- b) the expansion area can be easily integrated with the fabric of the existing built-up area
- c) the expansion area can be appropriately serviced
- d) an appropriate housing mix, as determined by the Municipal Housing Statement, is provided for on the lands
- e) new employment lands are an integral component of the expansion; and
- f) the lands can be easily accessed by existing arterial roads and will not contribute to traffic congestion within the existing community.

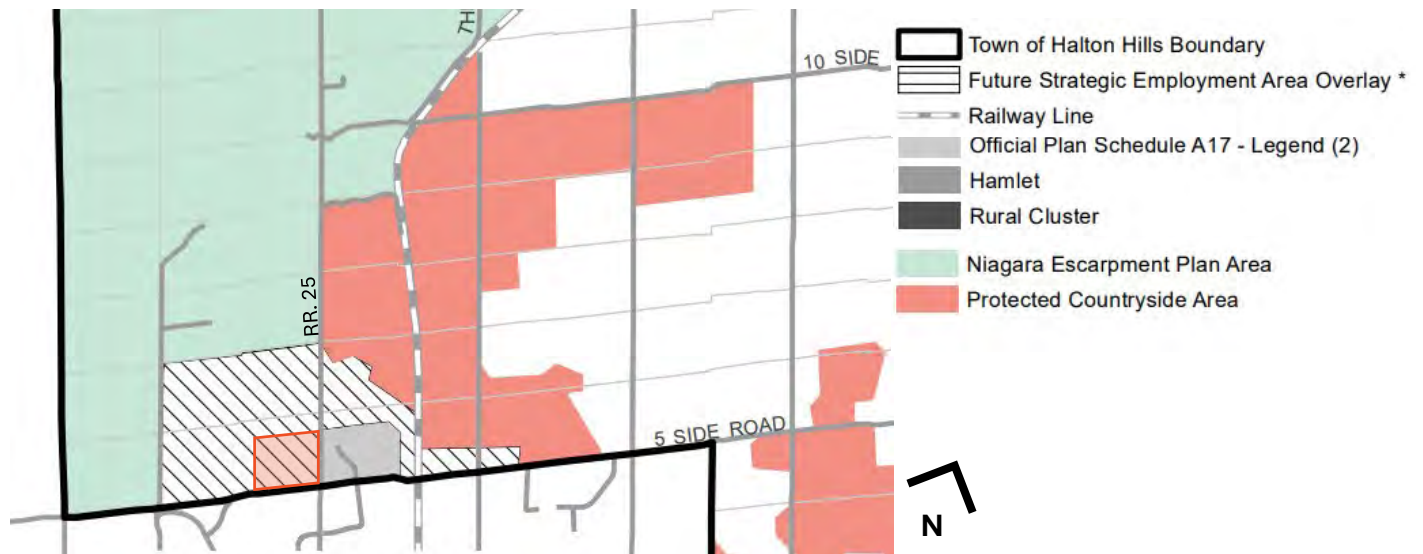
The Subject Site is situated immediately adjacent to the existing urban boundary of the Mansewood employment lands (located at the northeast corner of Highway 25 and 5 Side Road), and its identification as a Future Strategic Employment Area demonstrates its potential to conform to these criteria.

## 2 Location & Access

The Subject Site is located at the border of the municipal boundary between the Town of Halton Hills and the Town of Milton. It is currently designated Rural-Agricultural with a Future Strategic Employment Area overlay in the Town of Halton Hills Official Plan.

### 2.1 Surrounding Land Uses

Figure 3: Subject Site Location - Official Plan Schedule A-17



SOURCE: Town of Halton Hills Official Plan Schedule A-19

The following is an overview of the land uses surrounding the subject site:

**North** – The site’s northern boundary is defined by Regional Road 25, which separates it from the Mansewood Employment Area, a 59-hectare employment designation within the urban boundary, comprising 8 businesses with approximately 300 employees. Beyond the employment area are agricultural lands and Protected Countryside Area designations that continue northward.

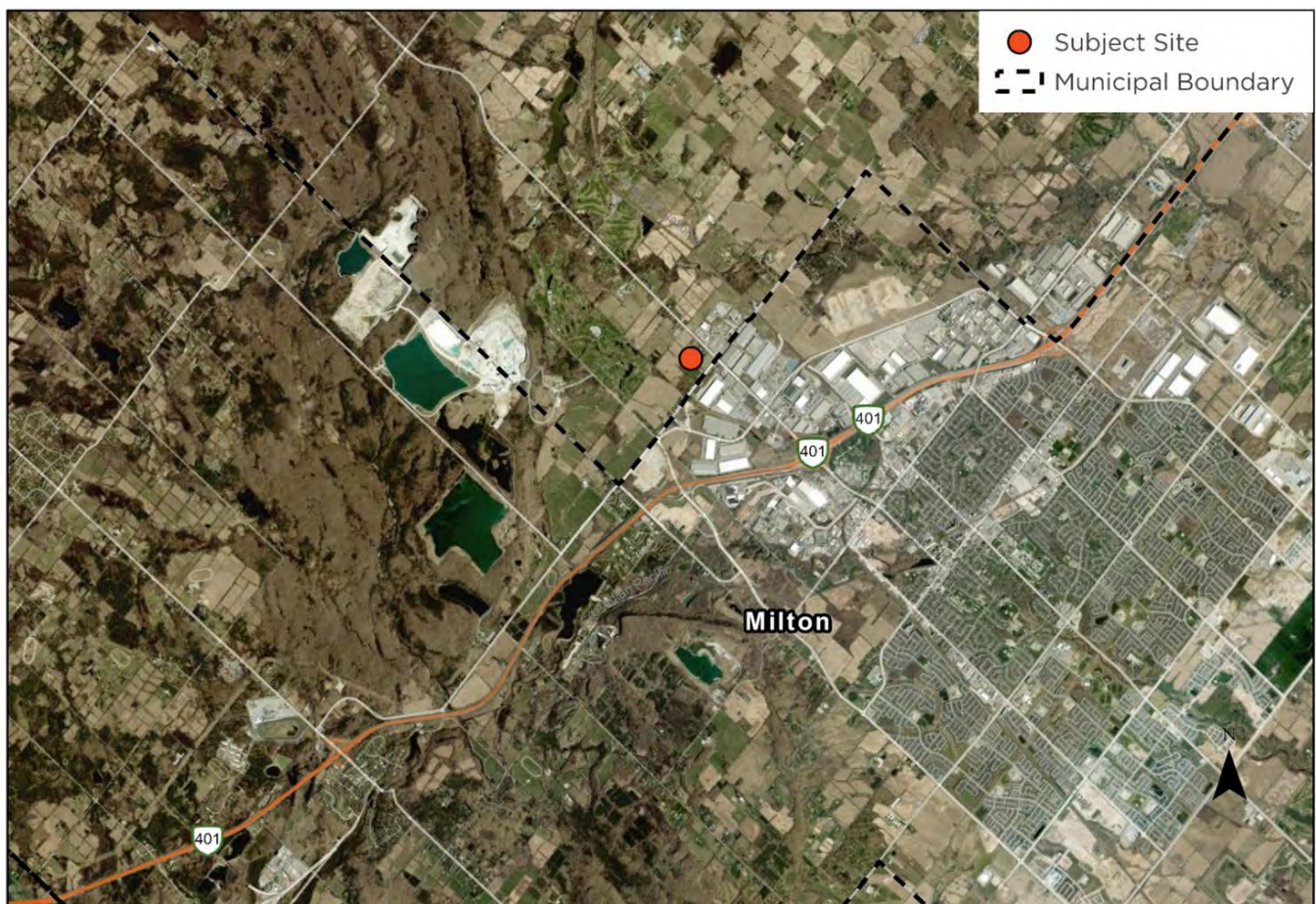
**East** – To the east, the site borders agricultural lands containing private residences. Further east of these lands, 5 Side Road forms the municipal boundary with Milton,

beyond which Business Park and General Industrial designations apply. This section of Milton is home to many large industrial buildings.

**South** – The lands south of the subject site within Halton Hills are designated for Agricultural uses and contain a driving range along with private residences primarily fronting onto 5 Side Road. Beyond 5 Side Road in Milton, additional Business Parks and General Industrial lands are located.

**West** – Agricultural lands border the site to the west, transitioning to Open Space (OS4) conservation zones, two golf clubs, and ultimately to a mineral aggregate operation across the municipal boundary within Milton.

Figure 4: Subject Site Location



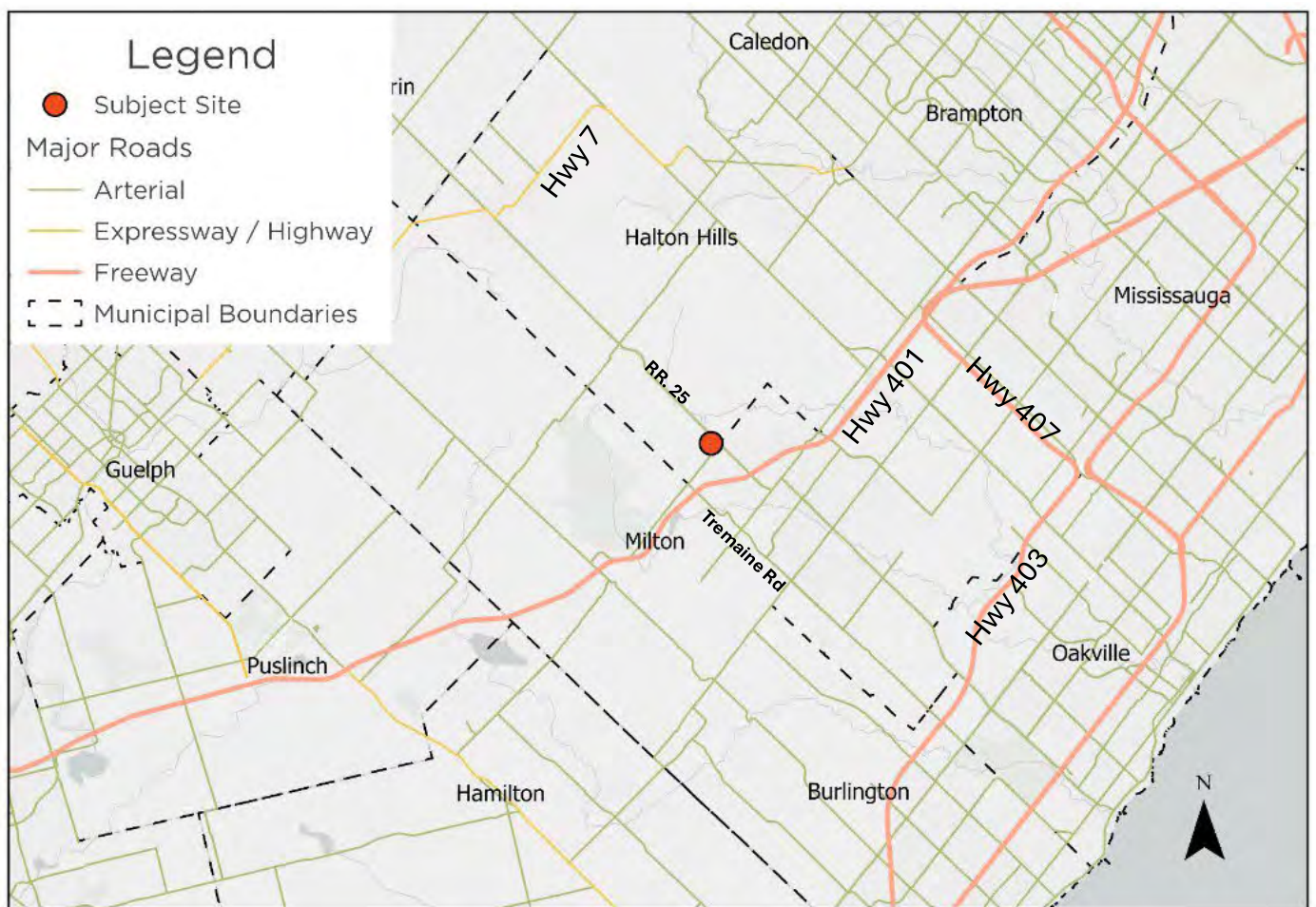
SOURCE: urbanMetrics Inc. with imagery from ESRI & MAXAR

## 2.2 Transportation Network

The Subject Site is located at the intersection of Regional Road 25 and Fifth Side Road, approximately 2 kilometres north of Highway 401. Regional Road 25 is an arterial road connecting the community of Acton to Highway 401. Fifth Side Road is a rural collector road that runs east-west and connects the more rural parts of Halton Hills with Milton, including the small hamlets of Campbellville, Mansewood, and Boston.

Highway 401 access is provided by an interchange located approximately 2 kilometres to the south with Regional Road 25, as well as through a new interchange with Tremaine Road, approximately 1.89 kilometres to the southwest.

Figure 5: Subject Site & Transportation Network



SOURCE: urbanMetrics Inc. with imagery via MAXAR & ESRI

In straight line distance, the Subject Site is approximately 12 kilometres from the community of Georgetown, 14 kilometres from Acton, and 3.5 kilometres from the bulk of the residential areas of Milton. Via Highway 401, the site is 10 kilometres from the 401/407 interchange and 30 kilometres from the 401/427 interchange.

The site's proximity to the highway system connects it to the broader regional commercial markets, while its location between Milton, Acton, and Georgetown provides excellent access to significant commercial demand from the main residential areas in Halton Hills and Milton.

## 2.3 Site Plan Considerations

The location of the Subject Site, the nature of its likely commercial tenants, and the orientation of entrances and circulation throughout the site align with this predominantly auto-supportive form of commercial development.

There is a limited residential population in the surrounding area to support direct population-related convenience commercial uses, with much of the residential population located south of Highway 401 in Milton, who are unlikely to travel across Highway 401 and past other commercial plazas and shopping centres to visit the Subject Site for smaller commercial convenience purchases.

As a result, customers will be drawn primarily from two categories. Firstly, large-format General Merchandise retailers act as regional draws, attracting visitors from across the western GTA. In addition, smaller retail and service commercial uses support employees on the site, employees in the nearby employment areas, pass-by traffic travelling along Regional Road 25 and 5<sup>th</sup> Side Road, and visitors attracted to the site by the large-format General Merchandise anchor.

# 3 Market Area

---

## 3.1 Market Area Delineation

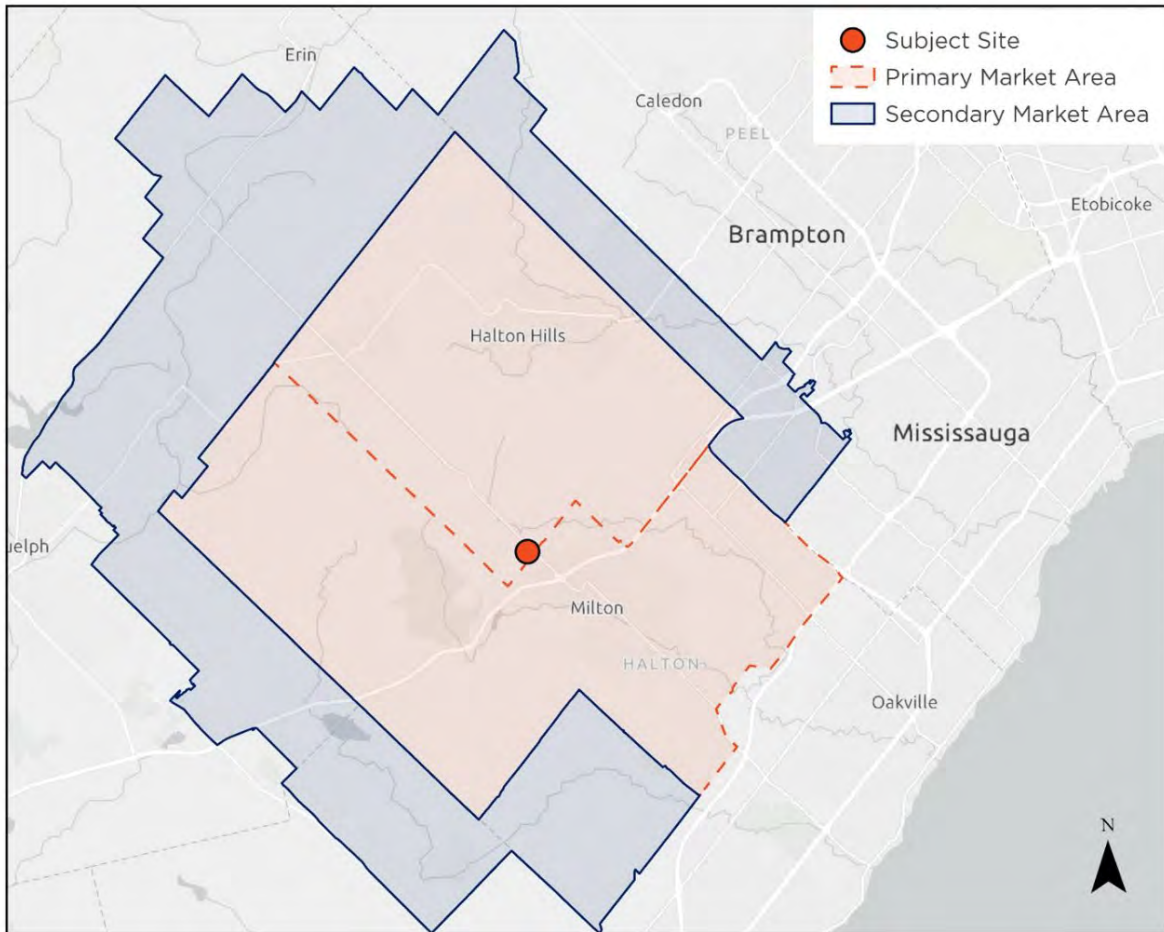
We have defined a Primary Market Area and a Secondary Market Area based on the following criteria:

- Available information and the geographic boundaries of Statistics Canada Dissemination Areas
- An analysis of 20, 30, and 45-minute drive times from the Subject Site
- The population and level of expenditure necessary to support the existing retailers within the area, achieving, at a minimum, their national average level of sales per square foot.
- Our experience with the regional-serving nature of large-format General Merchandise retailers.

After considering the above-noted factors and using our professional judgement, we defined a Market Area consisting of a Primary Area aligned with the boundaries of the Town of Halton and the Town of Milton.

The Secondary Market Area is delineated to include the outlying parts of Halton, Peel, and Wellington Counties located between more densely populated urban centres, where residents have multiple options for accessing large-format General Merchandise retailers. The delineated Market Area used in our analysis is shown in Figure 6 below.

Figure 6: Market Areas Map



SOURCE: urbanMetrics Inc.

## 3.2 Current Population

To evaluate the size of the market for retail and commercial services within the Market Area we have estimated the 2025 population using census population figures from 2021 and increased these figures to current levels by applying population per unit (“PPU”) estimates to the number of completed housing units within the Market Area as tracked by CMHC and Altus Data Studio.

These estimates are shown in Figure 7. CMHC identified approximately 4,489 unit completions between 2021 and 2025, with 4,289 completions in the Primary Market Area and 200 in the Secondary Market Area.

To estimate the new population associated with these completions, we applied the persons per unit (“PPU”) ratios from the municipality in which the development was completed<sup>1</sup>. In total, the Market Area is estimated to have grown by about 12,500 residents between the 2021 census and mid-2025, with 11,900 in the Primary Market Area and 600 in the Secondary Market Area.

Figure 7: 2021 Census and 2025 Population Estimate

| Area                         | 2021 Census Population | CMHC Unit Completions | Residents in New Development | 2025 Population Estimate |
|------------------------------|------------------------|-----------------------|------------------------------|--------------------------|
| <b>Primary Market Area</b>   | 202,000                | 4,289                 | 11,900                       | 213,900                  |
| Halton Hills                 | 64,900                 | 715                   | 1,900                        | 66,800                   |
| Milton                       | 137,100                | 3,574                 | 10,000                       | 147,100                  |
| <b>Secondary Market Area</b> | 110,500                | 200                   | 600                          | 111,100                  |
| <b>Total</b>                 | 312,500                | 4,489                 | 12,500                       | 325,000                  |

SOURCE: urbanMetrics Inc. from Statistic Canada 2021 Census Profiles, Development Information Unit completions from CMHC Housing Data Portal and Altus Data Studio, and DCBS prepared by relevant municipalities. Census population is adjusted for under-coverage. Numbers may not add due to rounding.

### 3.3 Population Growth

The 2025 estimated population is then projected forward to 2037 using a similar approach to the 2025 estimate. The Primary Market Area and Secondary Market Area are treated distinctly. In the Primary Area, Development applications tracked by the Town of Halton Hills and Town of Milton were classified as either “Short Term”, “Medium Term”, or “Long Term” based on their status, the type and scale of development, and current economic and market conditions.

As shown in Figure 8, 2,738 units are considered likely to develop in the short term, 18,566 in the medium term, and 44,750 in the long term. It should be noted that the long-term classification includes Secondary Plan Areas (“SPAs”), where the exact unit count may change as the plan progresses. The unit counts and population for these SPAs are based on the planning documents that inform the development of the Secondary Plans.

<sup>1</sup> Includes the Town of Halton Hills, the Town of Milton, the City of Hamilton, the City of Brampton, and Guelph Eramosa Township.

Figure 8: Primary Market Area Population Growth

| Primary Market Area Municipality | Unit Pipeline |               |               | New Residents |               |               |
|----------------------------------|---------------|---------------|---------------|---------------|---------------|---------------|
|                                  | Short Term    | Medium Term   | Long Term     | Short Term    | Medium Term   | Long Term     |
| Halton Hills                     | 1,500         | 5,268         | 0             | 3,805         | 10,388        | 0             |
| Milton                           | 1,238         | 13,298        | 44,750        | 2,233         | 20,686        | 89,500        |
| <b>Total</b>                     | <b>2,738</b>  | <b>18,566</b> | <b>44,750</b> | <b>6,000</b>  | <b>31,100</b> | <b>89,500</b> |

SOURCE: urbanMetrics Inc. from development application information and Secondary Plan processes provided by the Town of Halton Hills and Town of Milton. Accessed August 2025. Residential population estimated by multiplying units by the persons per unit ratio in each municipality's DCBS. Numbers may not add due to rounding.

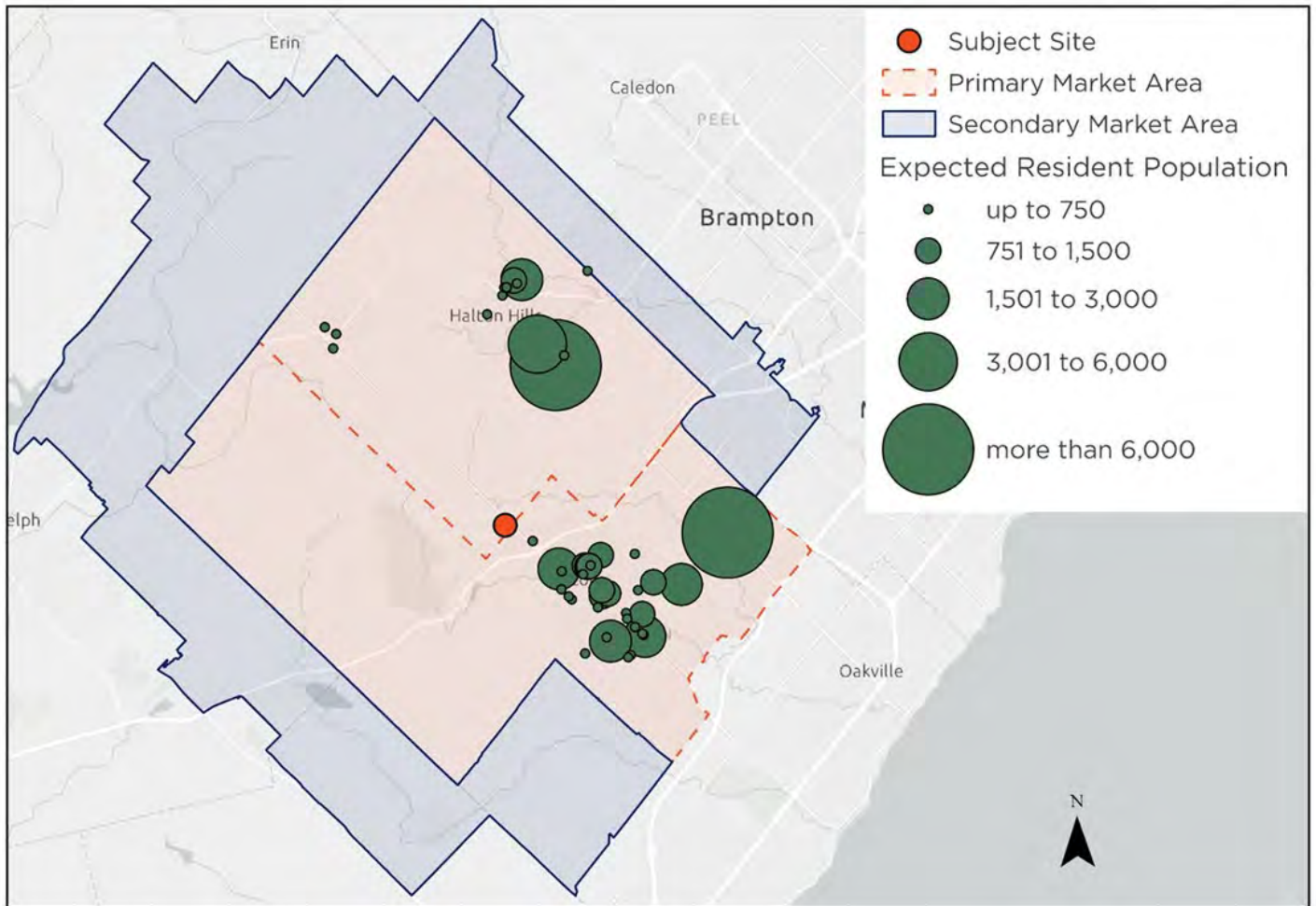
Overall, we estimate the population of the Primary Market Area will grow by about 6,000 people in the short term, expected by the end of 2028, 37,100 people in the medium term, projected for the end of 2034, and a total of 126,600 people in the long term, starting from 2034 and onward, based on the development required to reach these figures.

We have conservatively estimated that only 25% of the long-term unit pipeline will be realised by 2037, meaning that of the 89,500 new residents expected to move into the Primary Market Area over the long term, only 22,400 are conservatively factored into the demand calculations here. The remaining 67,100 residents are projected to move into the area after 2037.

In total, the Primary Market Area is projected to grow by:

- 6,000 residents by 2028
- 37,100 residents by 2034, reflecting additional growth of 31,100 residents between 2028 and 2034
- 59,300 residents by 2037, reflecting the realization of a significant proportion of the residential development pipeline in the 2034-2037 period that drives an increase of 22,300 residents between 2034 and 2037.

Figure 9: Active Residential Development Applications



SOURCE: Town of Halton Hills and Town of Milton Development Application Websites.

Geographically, residential development is concentrated on the edge of the existing built-up area in Milton and Georgetown, with some infill development also occurring in Acton, Milton, and Georgetown (Figure 9). As the Subject Site is located on the boundary of an existing Employment Area, there is no residential development activity proximate to the Subject Site. As a result, regardless of population growth, the commercial uses on the Subject Site will be expected to serve as a commercial destination, as well as meeting the convenience needs of drive-by travellers, and employees throughout the Employment Area.

Areas within the Secondary Market Area are assumed to increase by the average projected growth of their municipalities, with the Secondary Market Area as a whole increasing by the blended average of all constituent municipalities, based on

their current share of the total Secondary Market Area population. As shown in Figure 10, this blended average growth is forecast at approximately 1.2% per year.

Figure 10: Projected Market Area Population

|                              | <i>Base Year</i> |             |             |             |             |
|------------------------------|------------------|-------------|-------------|-------------|-------------|
|                              | <b>2025</b>      | <b>2028</b> | <b>2031</b> | <b>2034</b> | <b>2037</b> |
| <b>Primary Market Area</b>   |                  |             |             |             |             |
| Population                   | 213,900          | 219,900     | 235,400     | 250,900     | 273,200     |
| Annual Growth Rate           |                  | 0.9%        | 2.2%        | 2.1%        | 2.8%        |
| <b>Secondary Market Area</b> |                  |             |             |             |             |
| Population                   | 111,100          | 115,100     | 119,300     | 123,600     | 128,100     |
| Annual Growth Rate           |                  | 1.2%        | 1.2%        | 1.2%        | 1.2%        |
| <b>TOTAL</b>                 |                  |             |             |             |             |
| Population                   | 325,000          | 335,000     | 354,700     | 374,500     | 401,300     |
| Annual Increase              |                  | 3,400       | 6,500       | 6,600       | 9,000       |
| Annual Growth                |                  | 1.0%        | 1.9%        | 1.8%        | 2.3%        |
| Average Annual Growth        |                  | 1.0%        | 1.5%        | 1.6%        | 1.8%        |

SOURCE: urbanMetrics Inc. from development application information highlighted in Figure 8 and population projections in the Hamilton, Mississauga, Burlington, and Wellington County Development Charges Background Studies.

In total, the Primary Market Area is estimated to increase by 59,300 residents from a 2025 base year population of 213,900 to 273,200, while the Secondary Market Area is estimated to increase by 17,000 from 111,100 to 128,100.

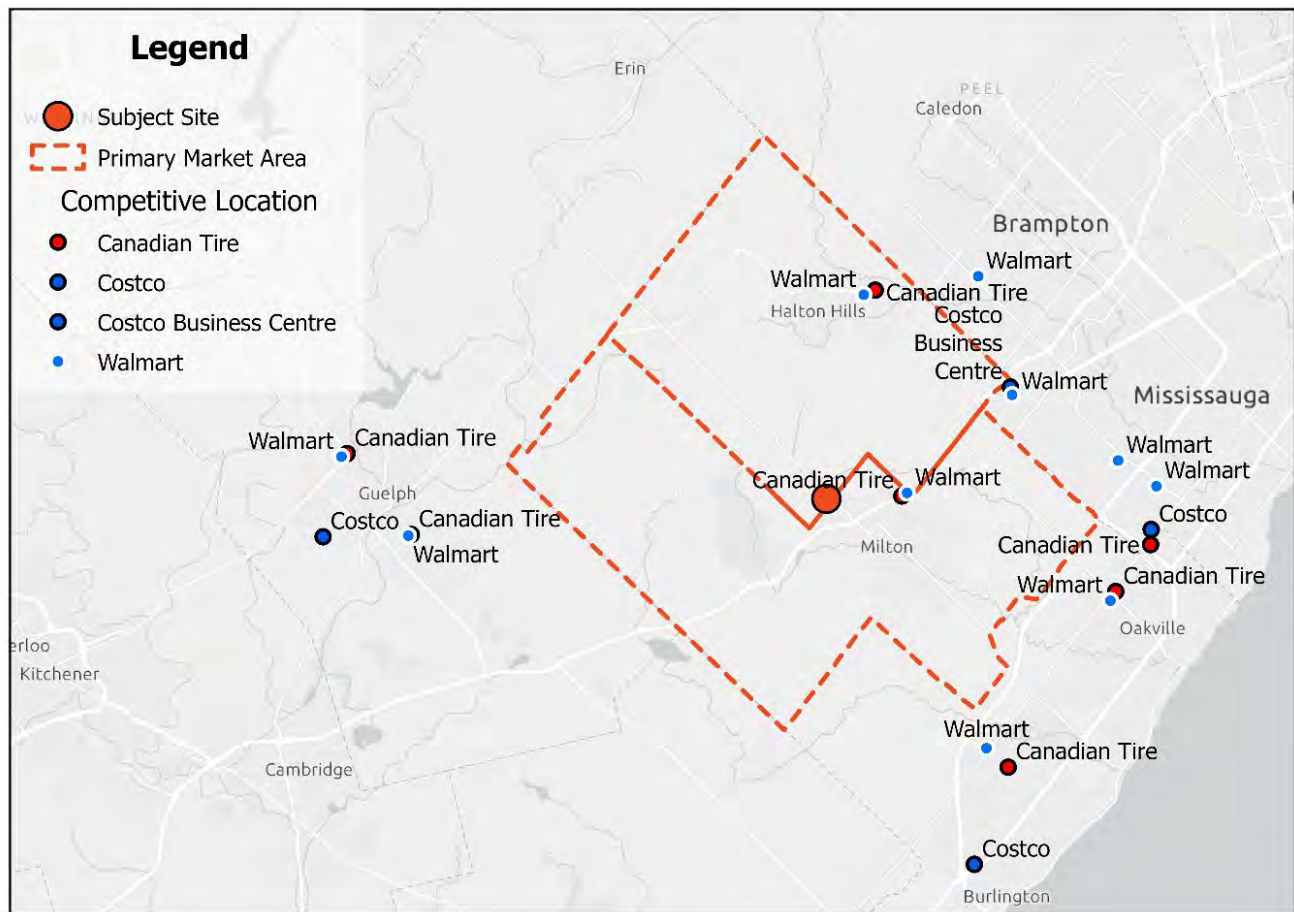
# 4 Supply Analysis

## 4.1 Inventory of Existing Facilities

Our inventory of existing commercial properties includes those likely to compete with the proposed development's uses. In general, this includes other large-format General Merchandise retailers, Supermarket & Grocery stores, and other auto-oriented retail/service commercial businesses primarily oriented towards meeting the needs of travellers and employees.

Our inventory of the Market Area and periphery identified twenty-one large-format General Merchandise retailers (Figure 11).

Figure 11: Market Area Large Format GM Retailers



SOURCE: urbanMetrics Inc. with imagery from ESRI & TomTom

There are currently four large General Merchandise locations in the Primary Market Area, a Walmart and a Canadian Tire in Georgetown, and a Walmart and a Canadian Tire at James Snow and Steeles in Milton.

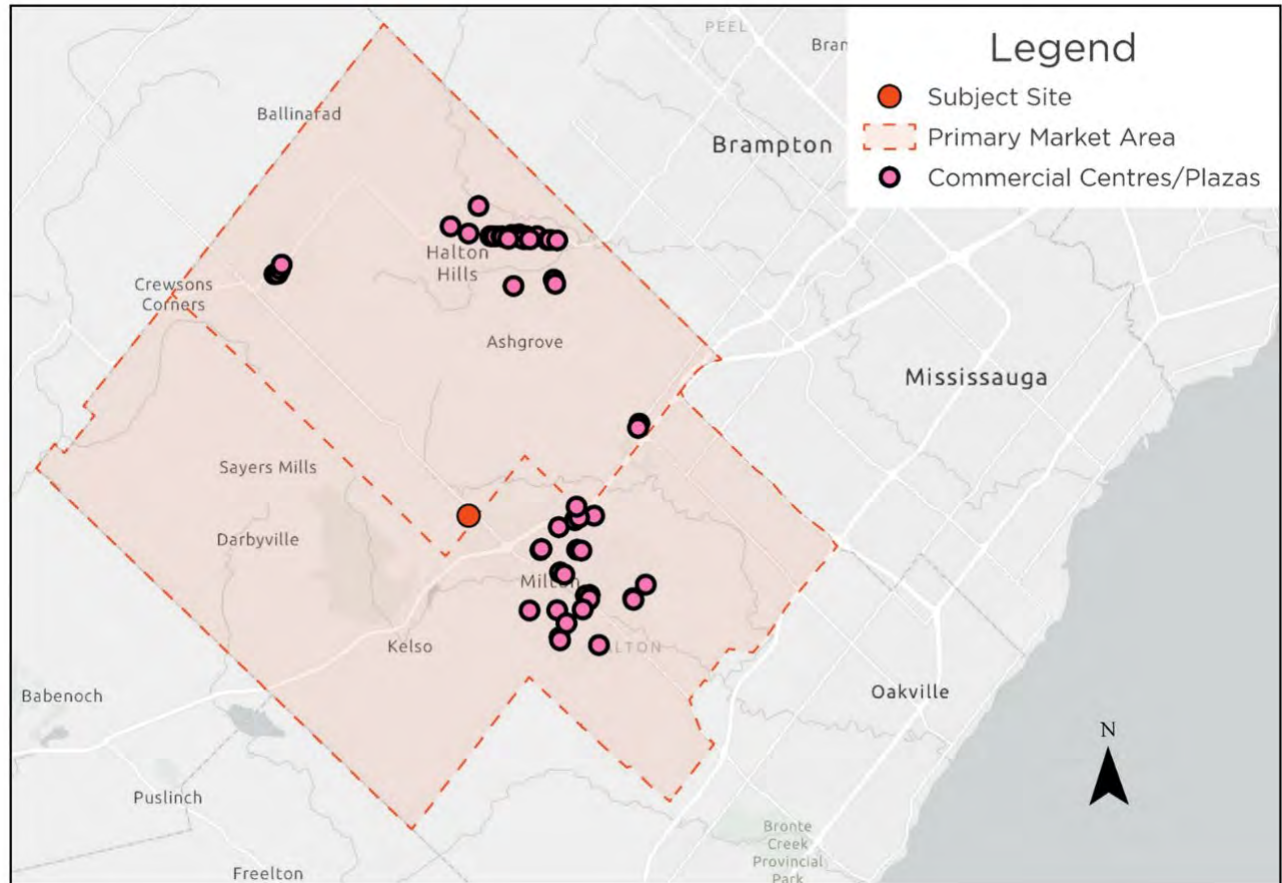
More notable is the extensive distribution of major GM retailers on the outskirts of the Primary Market Area. Many large GM retailers, including all the nearby Warehouse Membership Clubs, are dispersed throughout the Secondary Area as identified in Figure 6 and Figure 11. Specifically, the eastern part of the PMA is close to several WMCs, including a Costco Business Centre in northwest Mississauga and a Costco in western Brampton. While Costco Business Centres are primarily aimed at businesses rather than households, this nearby location in Mississauga adds to the competitive environment for residents in the PMA, particularly those in Milton.

Given the distribution of these competitive locations on the periphery of the Primary Area, it is likely that a significant proportion of GM expenditures by Primary Area residents currently occur outside the PMA. These expenditures occurring outside the Market Area (“leakages”) present a competitive opportunity to add another large-format General Merchandise retailer to capture this “lost” local share.

It should be noted that because the opportunity mainly stems from market growth and recapturing existing leakages, most competitive impacts are expected to affect current large-format GM retailers and WMCs in the Secondary Market Area. These may become the second-most, rather than the most, convenient locations for many PMA residents.

Along with a large GM retailer, the proposed development will feature a range of smaller units. These auto-oriented commercial spaces would serve pass-by traffic, employees in the surrounding employment area (including on-site staff), and the additional commercial needs of visitors attracted to the large anchor store on the property.

Figure 12: Market Area Commercial Centres/Plazas



SOURCE: urbanMetrics Inc. with data from CoStar Group. Imagery from ESRI & TomTom

We have identified fifty-nine multi-tenant commercial plazas with surface parking throughout the Primary Market Area (Figure 12). These properties range from traditional strip plazas of some 40,000 square feet to Power Centres of 300,000-plus square feet and include Neighbourhood and Community-scale plazas of intermediate size. As shown in Figure 12, these plazas are generally located in the established residential areas of Halton Hills and Milton, with some newer development oriented within the Highway 401 corridor.

As shown, there are no similar developments in the vicinity of the Subject Site, with the existing employment area and traffic travelling along Regional Road 25 and Fifth Side Road primarily being served by smaller standalone commercial units. The nearest concentration of commercial uses, generally standalone properties, are located along Regional Road 25 (Martin Street) south of Highway 401, between Chisholm Drive and Steeles Avenue East.

## 4.2 Proposed Developments

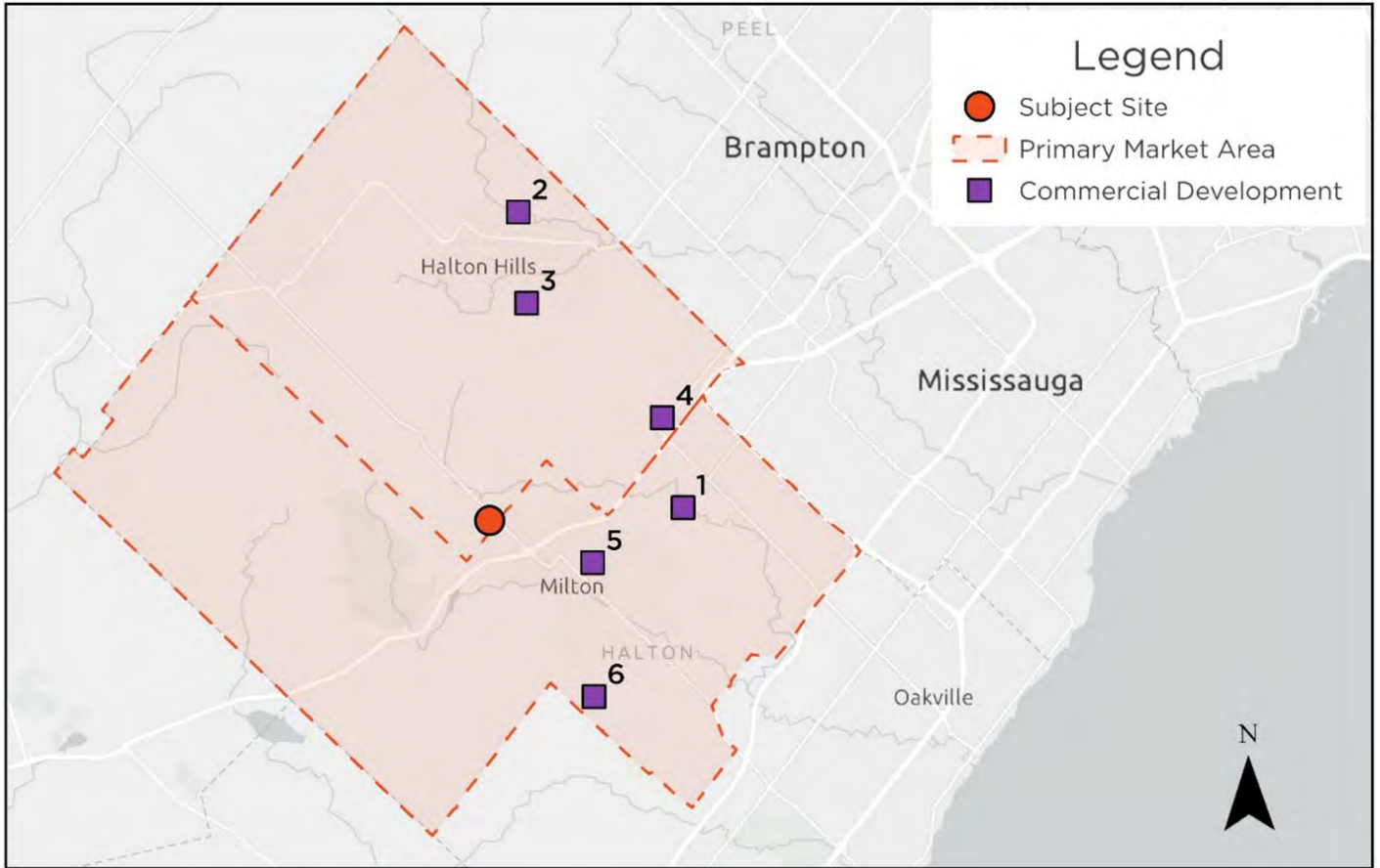
Our review of currently active commercial development applications identified six relevant developments, shown in Figure 13. These developments are spread throughout the Primary Market Area and include a range of commercial uses. These developments are all preliminary in nature and do not have exact commercial gross floor area estimates.

1. 11801 Derry Road - Proposed four-building commercial/industrial development
2. 99 River Drive – Proposed hotel and various commercial units
3. Trafalgar Road – Draft Plan of Subdivision for a complete community including live/work and mixed-use blocks
4. 8079 Eighth Line – Proposed Premier Gateway Entertainment Complex including a waterpark, hotel, convention centre, spa, restaurants, etc.
5. 700-706 Tremaine Road – Proposed multi-tower high-density mixed-use and commercial development intensifying the area near the Milton GO Station
6. Tremaine & Louis St. Laurent – Planned Milton Education Village included significant commercial and institutional uses alongside a variety of residential uses.

The proposed commercial developments identified in our inventory are not expected to be directly competitive with the proposed development, as they are not located in the same local area to compete for pass-by traffic to support smaller commercial tenants and do not seem to propose a similar large-format retail space, to compete with the major GM retail space proposed on the Subject Site.

The location of these proposed developments is shown in Figure 13 on the next page.

Figure 13: Commercial Development Pipeline



SOURCE: Town of Milton & Town of Halton Hills Development Application

# 5 Expenditure Potential

## 5.1 Population & Income

To evaluate the potential market for commercial uses in the proposed development and the possible impacts of this space on existing commercial outlets in the Primary Market Area, we have analyzed 2021 Census income data for residents in the Primary and Secondary Market Areas.

The Primary Market Area, including Halton Hills and Milton, reported average per capita incomes of \$40,842, some 91% of the Ontario average of \$44,747. The Secondary Market Area, comprised of a variety of parts of surrounding municipalities, had an estimated average per capita income of \$55,382, some 24% above the Ontario average (Figure 14). These incomes and their relationship to the provincial average are used to project expenditure levels across retail categories, which generally vary with income.

Figure 14: Market Area per Capita Incomes - 2021 Census

|                                   | Primary Market Area | Secondary Market Area | Ontario  |
|-----------------------------------|---------------------|-----------------------|----------|
| <b>Average Income per Capita</b>  | \$40,842            | \$55,382              | \$44,747 |
| <b>Index Relative to Province</b> | 0.91                | 1.24                  | 1.00     |

SOURCE: urbanMetrics Inc. using data from 2021 Statistics Canada Census Profiles

Figure 15 shows the average distribution of per capita expenditures across select retail categories in Ontario. These categories are based on the North America Industry Classification System (“NAICS”). Service categories are typically not evaluated using expenditures, as fluctuations in performance levels and revenue per square foot make this analysis difficult to apply to them.

The expenditure figures shown have been adjusted downward by 6% to reflect ongoing e-commerce penetration in the retail market. Data from Statistics Canada for 2024 showed that e-commerce accounted for 4%-8% of expenditures across all

categories. We have made the simplifying assumption of 6% and evenly applied it across all categories.

**Figure 15: Provincial Average Base Year Per Capita Expenditures**

| <i>Dollars</i>                               |                  |               |
|--|------------------|---------------|
| <b>Province of Ontario</b>                   |                  |               |
| <b>Food Store Retail (FSR)</b>               | <b>\$ 3,224</b>  | <b>28.5%</b>  |
| Supermarkets & Grocery Stores                | \$ 2,215         | 68.7%         |
| Convenience & Specialty Food Stores          | \$ 414           | 12.8%         |
| Beer, Wine and Liquor Stores                 | \$ 595           | 18.5%         |
| <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$ 8,106</b>  | <b>71.5%</b>  |
| General Merchandise                          | \$ 2,500         | 30.8%         |
| Health & Personal Care Stores                | \$ 1,402         | 17.3%         |
| Miscellaneous Retailers                      | \$ 973           | 12.0%         |
| Other  | \$ 3,230         | 39.9%         |
| <b>Total Retail Expenditures</b>             | <b>\$ 11,330</b> | <b>100.0%</b> |

SOURCE: urbanMetrics Inc. from Statistics Canada Table 11-10-0223-01, 36-10-0588-01<sup>2</sup>

The focus of our expenditure analysis is on the General Merchandise category. This focus is due to limited information regarding the type and scale of other commercial, retail, and service uses that may be in the proposed development. In addition, the proposed smaller retail and service units together only account for some 51,950 square feet of commercial space, an amount that is not significant enough to have any measurable impacts on the performance levels of existing stores in the existing and future other local commercial areas.

As shown in Figure 15, the Ontario per capita average expenditure in 2024 was \$3,224 on Food Store Retail and \$8,106 on Non-Food Retail, with some \$2,500 of this Non-Food spending attributed to the General Merchandise category.

The General Merchandise category (NAICS 452) includes retailers such as Walmart, Canadian Tire, Costco, Giant Tiger, Winners, Marshalls, HomeSense, a variety of dollar store brands, and other stores that are “primarily engaged in retailing a

<sup>2</sup> The “Other” category includes Furniture & Home Furnishings, Building Material & Garden Equipment & Supplies, Clothing & Clothing Accessories, Sporting Goods & Hobby & Book & Music, Electronics & Appliance Stores, and Motor Vehicle & Auto Parts.

general line of merchandise that may, or may not, include a general line of grocery items<sup>3</sup>”.

To convert provincial average per capita expenditures into figures for the Primary and Secondary Market Areas, we used a regression analysis comparing spending across five income levels. These levels correspond to five equal groups based on the population’s distribution of income values, including the 20% of the population with the lowest income, the 20% with the highest income, and the three groups in between.

The resulting analysis provides regression equations to estimate an individual’s likely expenditure relative to the provincial average. As shown in Figure 16, the Primary Market Area is estimated to average FSR expenditures of \$3,237 per capita and NFSR expenditures of \$8,028 per capita, with General Merchandise accounting for \$2,475 of NFSR spending.

The Secondary Market Area is estimated to average FSR expenditures of \$3,147 per capita and NFSR expenditures of \$8,227 per capita, with \$2,538 of NFSR spending in the General Merchandise Category.

**Figure 16: Market Area Base Year Per Capita Expenditures**

| <i>Dollars</i>                               |                  |               | <i>Dollars</i>                               |                  |               |
|--|------------------|---------------|--|------------------|---------------|
| <b>Primary Market Area</b>                   |                  |               | <b>Secondary Market Area</b>                 |                  |               |
| <b>Food Store Retail (FSR)</b>               | <b>\$ 3,237</b>  | <b>28.7%</b>  | <b>Food Store Retail (FSR)</b>               | <b>\$ 3,147</b>  | <b>27.7%</b>  |
| Supermarket & Grocery                        | \$ 2,224         | 68.7%         | Supermarket & Grocery                        | \$ 2,162         | 68.7%         |
| Convenience & Specialty Food                 | \$ 416           | 12.8%         | Convenience & Specialty Food                 | \$ 404           | 12.8%         |
| Beer, Wine and Liquor Stores                 | \$ 598           | 18.5%         | Beer, Wine and Liquor Stores                 | \$ 581           | 18.5%         |
| <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$ 8,028</b>  | <b>71.3%</b>  | <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$ 8,228</b>  | <b>72.3%</b>  |
| General Merchandise                          | \$ 2,476         | 30.8%         | General Merchandise                          | \$ 2,538         | 30.8%         |
| Health & Personal Care Stores                | \$ 1,388         | 17.3%         | Health & Personal Care Stores                | \$ 1,423         | 17.3%         |
| Miscellaneous Retailers                      | \$ 964           | 12.0%         | Miscellaneous Retailers                      | \$ 988           | 12.0%         |
| Other  | \$ 3,200         | 39.9%         | Other  | \$ 3,279         | 39.9%         |
| <b>Total Retail Expenditures</b>             | <b>\$ 11,265</b> | <b>100.0%</b> | <b>Total Retail Expenditures</b>             | <b>\$ 11,375</b> | <b>100.0%</b> |

SOURCE: urbanMetrics Inc. from Statistics Canada Table 11-10-0223-01, 36-10-0588-01

Typically, expenditures increase with income across categories. However, post-COVID, a trend emerged where, as incomes rose, individuals reduced spending on food store purchases (grocery, convenience, etc.) and increased spending on food services (food delivery and restaurants). As a result, the regression equation for FSR is negative, indicating that as incomes rise, expenditures in the FSR category

<sup>3</sup><https://www23.statcan.gc.ca/imdb/p3VD.pl?Function=getVD&TVD=1181553&CVD=1181576&CPV=452&CST=01012017&CLV=2&MLV=5>

decrease and are replaced by spending on food services that are not directly included in this analysis.

## 5.2 Expenditure Potential by Category

Using these estimated per capita expenditures for the population living in the Primary Market Area, these 213,900 residents are projected to generate an estimated total of \$2,408.8 million in spending in 2025, as shown in Figure 17. These expenditures comprise \$692.4 million in the FSR and \$1,716.4 million in the NFSR categories. General Merchandise accounts for approximately \$529.4 million of this NFSR spending.

As shown in Figure 17, total expenditures in the PMA are projected to increase by \$760 million to \$3,168.8 million by 2037. FSR expenditures are expected to increase by \$218.4 million to \$910.8 million, NFSR expenditures by \$541.6 million to \$2,258.0 million, and, as a portion of this, expenditures in the General Merchandise category are expected to increase by \$167.1 million to \$696.5 million.

Figure 17: Primary Market Area Expenditure Potential by Category

| 2024 Dollars                                     | 2025              | 2028              | 2031              | 2034              | 2037              |
|--|-------------------|-------------------|-------------------|-------------------|-------------------|
| Population                                       | 213,900           | 219,900           | 235,400           | 250,900           | 273,200           |
| Total Retail Expenditure Potential (\$Millions)  | \$ 2,408.8        | \$ 2,495.0        | \$ 2,690.8        | \$ 2,889.1        | \$ 3,168.8        |
| FSR  | \$ 692.4          | \$ 717.1          | \$ 773.5          | \$ 830.5          | \$ 910.8          |
| NFSR   | \$ 1,716.4        | \$ 1,777.9        | \$ 1,917.3        | \$ 2,058.6        | \$ 2,258.0        |
| <b>TOTAL</b>                                     | <b>100.0%</b>     | <b>100.0%</b>     | <b>100.0%</b>     | <b>100.0%</b>     | <b>100.0%</b>     |
| <b>Food Store Retail (\$Millions)</b>            | <b>\$ 692.4</b>   | <b>\$ 717.2</b>   | <b>\$ 773.5</b>   | <b>\$ 830.5</b>   | <b>\$ 910.8</b>   |
| Supermarkets & Grocery Stores (\$Millions)       | \$ 475.6          | \$ 492.6          | \$ 531.3          | \$ 570.5          | \$ 625.6          |
| Convenience & Specialty Food Stores (\$Millions) | \$ 88.9           | \$ 92.1           | \$ 99.4           | \$ 106.7          | \$ 117.0          |
| Beer, Wine and Liquor Stores (\$Millions)        | \$ 127.9          | \$ 132.4          | \$ 142.8          | \$ 153.4          | \$ 168.2          |
| <b>Non-Food Store Retail (\$Millions)</b>        | <b>\$ 1,716.4</b> | <b>\$ 1,777.9</b> | <b>\$ 1,917.3</b> | <b>\$ 2,058.6</b> | <b>\$ 2,258.0</b> |
| General Merchandise (\$Millions)                 | \$ 529.4          | \$ 548.4          | \$ 591.4          | \$ 635.0          | \$ 696.5          |
| Health & Personal Care Stores (\$Millions)       | \$ 296.8          | \$ 307.4          | \$ 331.5          | \$ 356.0          | \$ 390.5          |
| Miscellaneous Retailers (\$Millions)             | \$ 206.1          | \$ 213.5          | \$ 230.3          | \$ 247.2          | \$ 271.2          |
| Other (\$Millions)                               | \$ 684.1          | \$ 708.6          | \$ 764.1          | \$ 820.4          | \$ 899.9          |
| <b>TOTAL (\$Millions)</b>                        | <b>\$ 2,408.8</b> | <b>\$ 2,495.1</b> | <b>\$ 2,690.8</b> | <b>\$ 2,889.1</b> | <b>\$ 3,168.8</b> |
| <b>Cumulative Growth in Expenditures:</b>        |                   |                   |                   |                   |                   |
| TOTAL RETAIL EXPENDITURES                        |                   | \$ 86.3           | \$ 282.0          | \$ 480.3          | \$ 760.0          |
| <b>Food Store Retail (\$Millions)</b>            |                   | <b>\$ 24.8</b>    | <b>\$ 81.1</b>    | <b>\$ 138.1</b>   | <b>\$ 218.4</b>   |
| Supermarkets & Grocery Stores (\$Millions)       |                   | \$ 17.0           | \$ 55.7           | \$ 94.9           | \$ 150.0          |
| Convenience & Specialty Food Stores (\$Millions) |                   | \$ 3.2            | \$ 10.4           | \$ 17.7           | \$ 28.1           |
| Beer, Wine and Liquor Stores (\$Millions)        |                   | \$ 4.6            | \$ 15.0           | \$ 25.5           | \$ 40.3           |
| <b>Non-Food Store Retail (\$Millions)</b>        |                   | <b>\$ 61.5</b>    | <b>\$ 200.9</b>   | <b>\$ 342.2</b>   | <b>\$ 541.6</b>   |
| General Merchandise (\$Millions)                 |                   | \$ 19.0           | \$ 62.0           | \$ 105.5          | \$ 167.1          |
| Health & Personal Care Stores (\$Millions)       |                   | \$ 10.6           | \$ 34.7           | \$ 59.2           | \$ 93.7           |
| Miscellaneous Retailers (\$Millions)             |                   | \$ 7.4            | \$ 24.1           | \$ 41.1           | \$ 65.0           |
| Other (\$Millions)                               |                   | \$ 24.5           | \$ 80.1           | \$ 136.4          | \$ 215.8          |

1) The base year percentage distributions are urbanmetrics estimates based on our review of the provincial distribution.

SOURCE: urbanMetrics Inc.

In the Secondary Market Area, the 111,100 residents are estimated to generate \$1,263.6 million in total expenditures in 2025, as shown in Figure 18. These expenditures total \$349.6 million in the FSR and \$914.0 million in the NFSR categories. General Merchandise accounts for an estimated \$281.9 million.

As shown in Figure 18, total expenditures are projected to increase by \$237.1 million to \$1,500.7 million by 2037. FSR expenditures are expected to increase by \$65.6 million to \$415.2 million, NFSR expenditures by \$171.5 million to \$1,085.5 million, and expenditures in General Merchandise are expected to increase by \$52.9 million to \$334.8 million.

**Figure 18: Secondary Market Area Expenditure Potential by Category**

| <i>Dollars</i>                                   | 2025              | 2028              | 2031              | 2034              | 2037              |
|--|-------------------|-------------------|-------------------|-------------------|-------------------|
| Population                                       | 111,100           | 115,100           | 119,300           | 123,600           | 128,100           |
| Total Retail Expenditure Potential (\$Millions)  | \$ 1,263.6        | \$ 1,319.0        | \$ 1,377.3        | \$ 1,437.4        | \$ 1,500.7        |
| Food Stores                                      | \$ 349.6          | \$ 364.9          | \$ 381.0          | \$ 397.7          | \$ 415.2          |
| Non-Food Stores                                  | \$ 914.0          | \$ 954.1          | \$ 996.3          | \$ 1,039.7        | \$ 1,085.5        |
| <b>TOTAL</b>                                     | 100.0%            | 100.0%            | 100.0%            | 100.0%            | 100.0%            |
| <b>Food Store Retail (\$Millions)</b>            | <b>\$ 349.6</b>   | <b>\$ 364.9</b>   | <b>\$ 381.0</b>   | <b>\$ 397.7</b>   | <b>\$ 415.2</b>   |
| Supermarkets & Grocery Stores (\$Millions)       | \$ 240.1          | \$ 250.6          | \$ 261.7          | \$ 273.2          | \$ 285.2          |
| Convenience & Specialty Food Stores (\$Millions) | \$ 44.9           | \$ 46.9           | \$ 48.9           | \$ 51.1           | \$ 53.3           |
| Beer, Wine and Liquor Stores (\$Millions)        | \$ 64.6           | \$ 67.4           | \$ 70.4           | \$ 73.4           | \$ 76.7           |
| <b>Non-Food Store Retail (\$Millions)</b>        | <b>\$ 914.0</b>   | <b>\$ 954.1</b>   | <b>\$ 996.3</b>   | <b>\$ 1,039.7</b> | <b>\$ 1,085.5</b> |
| General Merchandise (\$Millions)                 | \$ 281.9          | \$ 294.3          | \$ 307.3          | \$ 320.7          | \$ 334.8          |
| Health & Personal Care Stores (\$Millions)       | \$ 158.1          | \$ 165.0          | \$ 172.3          | \$ 179.8          | \$ 187.7          |
| Miscellaneous Retailers (\$Millions)             | \$ 109.8          | \$ 114.6          | \$ 119.6          | \$ 124.9          | \$ 130.4          |
| Other (\$Millions)                               | \$ 364.3          | \$ 380.2          | \$ 397.1          | \$ 414.4          | \$ 432.6          |
| <b>TOTAL (\$Millions)</b>                        | <b>\$ 1,263.6</b> | <b>\$ 1,319.0</b> | <b>\$ 1,377.3</b> | <b>\$ 1,437.4</b> | <b>\$ 1,500.7</b> |
| <b>Cumulative Growth in Expenditures:</b>        |                   |                   |                   |                   |                   |
| TOTAL RETAIL EXPENDITURES                        |                   | \$ 55.4           | \$ 113.7          | \$ 173.8          | \$ 237.1          |
| <b>Food Store Retail (\$Millions)</b>            |                   | <b>\$ 15.3</b>    | <b>\$ 31.4</b>    | <b>\$ 48.1</b>    | <b>\$ 65.6</b>    |
| Supermarkets & Grocery Stores (\$Millions)       |                   | \$ 10.5           | \$ 21.6           | \$ 33.0           | \$ 45.1           |
| Convenience & Specialty Food Stores (\$Millions) |                   | \$ 2.0            | \$ 4.0            | \$ 6.2            | \$ 8.4            |
| Beer, Wine and Liquor Stores (\$Millions)        |                   | \$ 2.8            | \$ 5.8            | \$ 8.9            | \$ 12.1           |
| <b>Non-Food Store Retail (\$Millions)</b>        |                   | <b>\$ 40.1</b>    | <b>\$ 82.3</b>    | <b>\$ 125.7</b>   | <b>\$ 171.5</b>   |
| General Merchandise (\$Millions)                 |                   | \$ 12.4           | \$ 25.4           | \$ 38.8           | \$ 52.9           |
| Health & Personal Care Stores (\$Millions)       |                   | \$ 6.9            | \$ 14.2           | \$ 21.7           | \$ 29.7           |
| Miscellaneous Retailers (\$Millions)             |                   | \$ 4.8            | \$ 9.9            | \$ 15.1           | \$ 20.6           |
| Other (\$Millions)                               |                   | \$ 16.0           | \$ 32.8           | \$ 50.1           | \$ 68.3           |

1) The base year percentage distributions are urbanmetrics estimates based on our review of the provincial distribution.

SOURCE: urbanMetrics Inc.

The combined expenditure potential from the Primary and Secondary Market Areas is shown in Figure 19. As shown, the estimated gross expenditure potential of approximately \$3.67 billion is expected to increase to roughly \$4.67 billion. Total FSR expenditures in 2025 are estimated at \$1,042.0 million and are projected to increase to \$1,326.0 million by 2037. NFSR expenditures are estimated to grow

from \$2,630.4 million to \$3,343.5 million by 2037. General Merchandise is expected to increase from \$811.3 million to \$1,031.3 million in 2037.

**Figure 19: Total Market Area Expenditure Potential**

| <b>Market Area Growth</b>                    | <b>2025<br/>Expenditures<br/>(\$Millions)</b> | <b>2028<br/>Expenditures<br/>(\$Millions)</b> | <b>2031<br/>Expenditures<br/>(\$Millions)</b> | <b>2034<br/>Expenditures<br/>(\$Millions)</b> | <b>2037<br/>Expenditures<br/>(\$Millions)</b> |
|--|---|---|---|---|---|
| <b>Food Store Retail (FSR)</b>               | <b>\$1,042.0</b>                              | <b>\$1,082.1</b>                              | <b>\$1,154.5</b>                              | <b>\$1,228.2</b>                              | <b>\$1,326.0</b>                              |
| Supermarket & Grocery                        | \$715.7                                       | \$743.3                                       | \$793.0                                       | \$843.6                                       | \$910.8                                       |
| Convenience & Specialty Food                 | \$133.9                                       | \$139.0                                       | \$148.3                                       | \$157.8                                       | \$170.3                                       |
| Beer, Wine and Liquor Stores                 | \$192.4                                       | \$199.8                                       | \$213.2                                       | \$226.8                                       | \$244.8                                       |
| <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$2,630.4</b>                              | <b>\$2,732.0</b>                              | <b>\$2,913.6</b>                              | <b>\$3,098.3</b>                              | <b>\$3,343.5</b>                              |
| General Merchandise                          | \$811.3                                       | \$842.7                                       | \$898.7                                       | \$955.6                                       | \$1,031.3                                     |
| Health & Personal Care Stores                | \$454.9                                       | \$472.4                                       | \$503.8                                       | \$535.8                                       | \$578.2                                       |
| Miscellaneous Retailers                      | \$315.9                                       | \$328.1                                       | \$349.9                                       | \$372.1                                       | \$401.5                                       |
| Other  | \$1,048.3                                     | \$1,088.8                                     | \$1,161.2                                     | \$1,234.8                                     | \$1,332.5                                     |
| <b>Total</b>                                 | <b>\$3,672.4</b>                              | <b>\$3,814.1</b>                              | <b>\$4,068.1</b>                              | <b>\$4,326.5</b>                              | <b>\$4,669.5</b>                              |

SOURCE: urbanMetrics Inc.

# 6 Market Opportunity

## 6.1 Expenditures in the Market Area

To estimate the actual market potential available within the Market Area, a capture rate is applied to the total expenditures of Market Area residents (Figure 19) based on the expected spending that would occur within the geographic boundaries of the Primary Market Area. It should be noted that the aggregate capture rates for the PMA include spending by residents of the Primary Market Area and Secondary Market Area, which have different individual capture rates.

For example, in 2025, approximately 70.0% of Supermarket & Grocery Store expenditures made by residents of the Market Area are estimated to occur within the Primary Market Area. This percentage assumes that the remaining 30.0% of spending in this category occurs in the Secondary Market Area or outside the Market Area altogether. These expenditures from Area residents that occur outside the area are referred to as “leakages”.

Figure 20: Resident Expenditures in the Market Area

| Market Area Growth                           | 2025           |                                    | 2028           |                                    | 2031           |                                    | 2034           |                                    | 2037           |                                    |
|--|----------------|------------------------------------|----------------|------------------------------------|----------------|------------------------------------|----------------|------------------------------------|----------------|------------------------------------|
|  | Share of Total | Adjusted Expenditures (\$Millions) | Share of Total | Adjusted Expenditures (\$Millions) | Share of Total | Adjusted Expenditures (\$Millions) | Share of Total | Adjusted Expenditures (\$Millions) | Share of Total | Adjusted Expenditures (\$Millions) |
| <b>Food Store Retail (FSR)</b>               |                | <b>\$706.36</b>                    |                | <b>\$732.48</b>                    |                | <b>\$799.51</b>                    |                | <b>\$855.02</b>                    |                | <b>\$931.40</b>                    |
| Supermarkets & Grocery Stores                | 70%            | \$500.08                           | 70%            | \$518.58                           | 72%            | \$569.97                           | 72%            | \$609.63                           | 73%            | \$664.26                           |
| Convenience & Specialty Food Stores          | 63%            | \$84.63                            | 63%            | \$87.76                            | 63%            | \$94.17                            | 64%            | \$100.67                           | 64%            | \$109.60                           |
| Beer, Wine and Liquor Stores                 | 63%            | \$121.65                           | 63%            | \$126.14                           | 63%            | \$135.37                           | 64%            | \$144.71                           | 64%            | \$157.54                           |
| <b>Selected Non-Food Store Retail (NFSR)</b> |                | <b>\$1,513.25</b>                  |                | <b>\$1,771.75</b>                  |                | <b>\$1,900.13</b>                  |                | <b>\$2,030.46</b>                  |                | <b>\$2,209.40</b>                  |
| General Merchandise                          | 46%            | \$374.03                           | 70%            | \$590.19                           | 70%            | \$632.69                           | 71%            | \$675.85                           | 71%            | \$734.96                           |
| Health & Personal Care Stores                | 63%            | \$284.86                           | 63%            | \$295.45                           | 63%            | \$316.92                           | 63%            | \$338.72                           | 64%            | \$368.68                           |
| Miscellaneous Retailers                      | 63%            | \$197.83                           | 63%            | \$205.18                           | 63%            | \$220.10                           | 63%            | \$235.23                           | 64%            | \$256.04                           |
| Other  | 63%            | \$656.52                           | 63%            | \$680.93                           | 63%            | \$730.42                           | 63%            | \$780.66                           | 64%            | \$849.71                           |
| <b>Total</b>                                 |                | <b>\$2,220</b>                     |                | <b>\$2,504</b>                     |                | <b>\$2,700</b>                     |                | <b>\$2,885</b>                     |                | <b>\$3,141</b>                     |

SOURCE: urbanMetrics Inc. Numbers may not add due to capture rate rounding to 0.025. Capture rate is calculated based on a blend of PMA and SMA. Individual capture rates per Market Area are detailed in the Appendix.

As shown in Figure 20, resident expenditures within the Market Area are estimated at a 2025 baseline of \$2,220 million and projected to increase to \$3,141 million by 2037. General Merchandise expenditures are projected to grow from \$374.03

million to \$734.96 million over this same period. This increase in GM expenditures is driven by population growth and the assumption that, with the introduction of another large-format GM retailer in the Primary Market Area, residents will spend a larger proportion of their GM expenditures in this area.

This is reflected in the GM category's capture rate, which increases from 45% in 2025 to 72.5% in 2037. This increase is warranted by the large proportion of GTA residents who are members of warehouse membership clubs, and the likelihood that many current PMA residents are already travelling to locations outside the PMA and making expenditures in this category. With a more conveniently located option, this spending is expected to transition from a leakage or outflow to driving an increased capture rate.

In addition, the gradual increase in capture rates shown in Figure 20 is reflective of the shifting dynamic between the PMA and SMA. As the population of the Primary Market Area grows faster than that of the Secondary Market Area, the higher capture rate applied to this more rapidly growing population drives an increase in the overall capture rate, despite the independent capture rates for the Primary Market Area and Secondary Market Area remaining constant.

## 6.2 Inflow

In addition to expenditures by residents of the Market Area as identified in Figure 20, total expenditures also include spending by residents of other areas during their visits to the area. This could include individuals who travel specifically for a shopping trip, as well as those who work in the area, visitors, tourists, or pass-through traffic.

Expenditures by these non-residents are referred to as “inflow” expenditures. The intensity of inflow, or the proportion of total expenditures by non-residents, varies by location and retail category, typically between 5% and 20%, with higher inflows at regional or super-regional shopping centres. Inflow at comparable WMC locations ranges between 15% and 25%, with our analysis applying a conservative 15% at opening. Additional information on inflow rates and data from comparable locations is available in Appendix A1.

Figure 21: Resident &amp; Inflow Expenditures

| Market Area Expenditures (\$Millions)        | 2025             |                |                  | 2028             |                |                  | 2031             |                |                  | 2034             |                |                  | 2037             |                |                  |
|--|------------------|----------------|------------------|------------------|----------------|------------------|------------------|----------------|------------------|------------------|----------------|------------------|------------------|----------------|------------------|
|  | Resident         | Inflow         | Total            | Resident         | Inflow         | Total            | Resident         | Inflow         | Total            | Resident         | Inflow         | Total            | Resident         | Inflow         | Total            |
| <b>Food Store Retail (FSR)</b>               | <b>\$706.4</b>   | <b>\$78.5</b>  | <b>\$784.8</b>   | <b>\$732.5</b>   | <b>\$81.4</b>  | <b>\$813.9</b>   | <b>\$799.5</b>   | <b>\$85.3</b>  | <b>\$884.8</b>   | <b>\$855.0</b>   | <b>\$87.6</b>  | <b>\$942.6</b>   | <b>\$931.4</b>   | <b>\$91.4</b>  | <b>\$1,022.8</b> |
| Supermarkets & Grocery Stores                | \$500.1          | \$55.6         | \$555.6          | \$518.6          | \$57.6         | \$576.2          | \$570.0          | \$59.8         | \$629.8          | \$609.6          | \$60.3         | \$669.9          | \$664.3          | \$61.7         | \$726.0          |
| Convenience & Specialty Food Stores          | \$84.6           | \$9.4          | \$94.0           | \$87.8           | \$9.8          | \$97.5           | \$94.2           | \$10.5         | \$104.6          | \$100.7          | \$11.2         | \$111.9          | \$109.6          | \$12.2         | \$121.8          |
| Beer, Wine and Liquor Stores                 | \$121.6          | \$13.5         | \$135.2          | \$126.1          | \$14.0         | \$140.2          | \$135.4          | \$15.0         | \$150.4          | \$144.7          | \$16.1         | \$160.8          | \$157.5          | \$17.5         | \$175.0          |
| <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$1,513.2</b> | <b>\$146.3</b> | <b>\$1,659.5</b> | <b>\$1,771.8</b> | <b>\$235.4</b> | <b>\$2,007.2</b> | <b>\$1,900.1</b> | <b>\$252.5</b> | <b>\$2,152.6</b> | <b>\$2,030.5</b> | <b>\$269.8</b> | <b>\$2,300.2</b> | <b>\$2,209.4</b> | <b>\$293.5</b> | <b>\$2,502.9</b> |
| General Merchandise                          | \$374.0          | \$19.7         | \$393.7          | \$590.2          | \$104.2        | \$694.3          | \$632.7          | \$111.7        | \$744.3          | \$675.8          | \$119.3        | \$795.1          | \$735.0          | \$129.7        | \$864.7          |
| Health & Personal Care Stores                | \$284.9          | \$31.7         | \$316.5          | \$295.4          | \$32.8         | \$328.3          | \$316.9          | \$35.2         | \$352.1          | \$338.7          | \$37.6         | \$376.4          | \$368.7          | \$41.0         | \$409.6          |
| Miscellaneous Retailers                      | \$197.8          | \$22.0         | \$219.8          | \$205.2          | \$22.8         | \$228.0          | \$220.1          | \$24.5         | \$244.6          | \$235.2          | \$26.1         | \$261.4          | \$256.0          | \$28.4         | \$284.5          |
| Other  | \$656.5          | \$72.9         | \$729.5          | \$680.9          | \$75.7         | \$756.6          | \$730.4          | \$81.2         | \$811.6          | \$780.7          | \$86.7         | \$867.4          | \$849.7          | \$94.4         | \$944.1          |
| <b>Total</b>                                 | <b>\$2,219.6</b> | <b>\$224.7</b> | <b>\$2,444.4</b> | <b>\$2,504.2</b> | <b>\$316.8</b> | <b>\$2,821.0</b> | <b>\$2,699.6</b> | <b>\$337.8</b> | <b>\$3,037.5</b> | <b>\$2,885.5</b> | <b>\$357.3</b> | <b>\$3,242.8</b> | <b>\$3,140.8</b> | <b>\$384.9</b> | <b>\$3,525.7</b> |

SOURCE: urbanMetrics Inc. Numbers may not add due to rounding.

As shown in Figure 21, in 2025, an estimated \$224.7 million in inflow expenditures increases the available market from \$2,219.6 million to \$2,444.4 million. General Merchandise spending is estimated to increase by \$19.7 million from \$374.0 million to \$393.7 million.

By 2037, projected inflow expenditures of \$384.9 million is added to total resident spending of \$3,140.8 million, increasing total retail expenditures in the Primary Market Area to \$3,525.7 million while General Merchandise inflow of \$129.7 million adds to resident expenditures of \$735.0 million for a total GM market potential of \$864.7 million.

## 6.3 Residual Market Calculation

The residual market potential includes the total amount of expenditures available to support growth, including new entrants into the market and improvements in the sales performance of existing retailers. This total takes the total expenditure potential in (Figure 19), adjusts it based on capture rates (Figure 20), and adds estimated additional inflow expenditures from other market areas (Figure 21).

Figure 22 summarizes the incremental growth in expenditures per period. As indicated, the overall retail market is projected to increase by \$593.1 million through 2031 and by more than \$1,081.4 million through 2037. The General Merchandise category, driven by population growth and increasing capture rates is projected to increase by \$350.6 million by 2031 and \$470.9 million by 2037.

Figure 22: Incremental Market Growth Projections

| Market Area Expenditures Including Inflow (\$Millions) | Total Baseline Expenditures | 2028 Incremental Expenditure Growth | 2031 Incremental Expenditure Growth | 2034 Incremental Expenditure Growth | 2037 Incremental Expenditure Growth |
|--|-----------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| <b>Food Store Retail (FSR)</b>                         | <b>\$784.8</b>              | <b>\$29.0</b>                       | <b>\$100.0</b>                      | <b>\$157.7</b>                      | <b>\$237.9</b>                      |
| Supermarkets & Grocery Stores                          | \$555.6                     | \$20.5                              | \$74.2                              | \$114.3                             | \$170.3                             |
| Convenience & Specialty Food Stores                    | \$94.0                      | \$3.5                               | \$10.6                              | \$17.8                              | \$27.7                              |
| Beer, Wine and Liquor Stores                           | \$135.2                     | \$5.0                               | \$15.2                              | \$25.6                              | \$39.9                              |
| <b>Selected Non-Food Store Retail (NFSR)</b>           | <b>\$1,659.5</b>            | <b>\$347.7</b>                      | <b>\$493.1</b>                      | <b>\$640.7</b>                      | <b>\$843.4</b>                      |
| General Merchandise                                    | \$393.7                     | \$300.6                             | \$350.6                             | \$401.4                             | \$470.9                             |
| Health & Personal Care Stores                          | \$316.5                     | \$11.8                              | \$35.6                              | \$59.8                              | \$93.1                              |
| Miscellaneous Retailers                                | \$219.8                     | \$8.2                               | \$24.7                              | \$41.6                              | \$64.7                              |
| Other  | \$729.5                     | \$27.1                              | \$82.1                              | \$137.9                             | \$214.6                             |
| <b>Total</b>   | <b>\$2,444.4</b>            | <b>\$376.7</b>                      | <b>\$593.1</b>                      | <b>\$798.5</b>                      | <b>\$1,081.4</b>                    |

SOURCE: urbanMetrics Inc. (\$Millions). Numbers may not add due to rounding.

Notably, population and expenditure growth are projected to create market potential across a variety of categories, predominantly in Supermarkets & Grocery, General Merchandise, Health & Personal Care Stores, and the multiple categories captured in “Other”. This incremental market growth is sufficient to support new entrants in the General Merchandise category, such as the large-format retailer on the Subject Site, as well as across multiple categories.

## 6.4 Sales Transfer Estimates

In addition to evaluating the market overall, we have conducted a sales transfer impact analysis to assess the potential impacts of introducing an additional 167,000-square-foot large-format GM retailer on existing GM retailers in the Primary Market Area.

This analysis uses sales-per-square-foot performance metrics to evaluate the potential impact of this change on the performance of two subcategories within the GM category – Large Format and Discount, as well as on the Supermarket category. The supermarket category is evaluated because, while the General Merchandise and Supermarket categories are identified and reported on separately, the GM retailers offer a variety of food products, including entire supermarket sections at some retailers. As such, the introduction of another large-format GM retailer has the potential to transfer sales from existing or planned supermarkets to the GM category.

## General Merchandise Category Impacts

Large-format GM retailers include Walmart, Costco, and Canadian Tire, which together account for more than 60% of GM category sales nationally. As leaders in the category, these brands' sales per square foot levels range between \$450 to more than \$2,000 per square foot and exceed those of other retailers. Discount GM retailers include dollar stores, Marshalls, Winners, HomeSense, and Giant Tiger, as well as smaller independents. These retailers typically achieve performance levels of between \$200 and \$500 per square foot.

Figure 23 demonstrates the impact of introducing a large-format GM retailer on the Subject Site on the marketplace. In 2025, existing large-format retailers in the Market Area are assumed to achieve a baseline performance level of approximately \$915 per square foot, and discount retailers \$485 per square foot, both of which are above average performance levels reflective of the relatively limited supply of competitive space in the PMA.

In 2028, the approximately 167,100-square-foot large-format GM retailer on the Subject Site is assumed to open. To test the impact of introducing this store into the market we have estimate a performance level of approximately \$2,060 per square foot, which is within the range of normal store performance for a leading brand in Canada and is a reasonable expectation for a new location. As shown, despite this significant increase in space, initial impacts are relatively limited to a 2% decline in performance for Large-Format and an 8% decline in Discount GM retailers. These initial negative impacts are estimated to be completely recovered by 2034.

Despite a decrease in their share of total market expenditures in the GM category, existing large-format GM retailers are projected to experience 22% higher sales performance by 2037. This is not unexpected and is evidence of the co-locational theory of GM retailers, where, despite being in the same category, large-format GM retailers, including Warehouse Membership Clubs, often locate in the same commercial node.

We have also analyzed the impacts of sales transfers from the Supermarket & Grocery category to reflect the potential for a larger share of residents' food spend to occur at large-format GM retailers with a new market entrant. Beginning at a 5% transfer at the assumed store opening in 2028, this declines by 1% per period to 2% in 2037. This assumption reflects that, as the market matures with a new entrant established, this shift in food spending behaviour moderates and market and population growth increasingly reduce the size of the transfer relative to the overall market.

Figure 23: Market Area GM Sales Transfer Impacts – Selected Periods

| 2025  | Market Area | Large-Format | Subject Site | Discount GM |
|---|-------------|--------------|--------------|-------------|
| Market Area Expenditure Potential - GM (Adjusted) | \$374.2     | \$318.1      |              | \$56.1      |
| Share of Local Expenditures                       | 100%        | 85.0%        |              | 15.0%       |
| <i>Transfer from Supermarket Spend</i>            |             |              |              |             |
| Market Expenditures                               | \$374.2     | \$318.1      |              | \$56.1      |
| <i>Inflow</i>                                     | \$19.7      | \$18.7       |              | \$1.0       |
| Total Expenditures                                | \$393.9     | \$336.8      |              | \$57.1      |
| Share of Total Market Expenditures                | 100%        | 86%          |              | 15%         |
| Total Sales                                       | \$393.9     | \$336.8      |              | \$57.1      |
| Square Footage                                    | 484,700     | 367,500      |              | 117,200     |
| Baseline Sales per sq. ft.                        |             | \$915.0      |              | \$485.0     |
| <b>% Change from 2025 Baseline</b>                |             | <b>0%</b>    |              | <b>0%</b>   |
| 2028  | Market Area | Large-Format | Subject Site | Discount GM |
| Market Area Expenditure Potential - GM (Adjusted) | \$590.4     | \$318.8      | \$224.4      | \$47.2      |
| Share of Local Expenditures                       | 100%        | 54.0%        | 38.0%        | 8.0%        |
| <i>Transfer from Supermarket Spend</i>            | \$25.9      |              | \$25.9       |             |
| Market Expenditures                               | \$616.4     | \$318.8      | \$250.3      | \$47.2      |
| <i>Inflow</i>                                     | \$104.2     | \$10.4       | \$93.8       | \$5.2       |
| Total Market Expenditures                         | \$720.6     | \$329.3      | \$344.1      | \$52.4      |
| Share of Total Market Expenditures                | 100%        | 55%          | 48%          | 7%          |
| Total Sales                                       | \$720.6     | \$329.3      | \$344.1      | \$52.4      |
| Square Footage                                    | 651,700     | 367,500      | 167,000      | 117,200     |
| Baseline Sales per sq. ft.                        |             | \$895.0      | \$2,060.0    | \$445.0     |
| <b>% Change from 2025 Baseline</b>                |             | <b>-2%</b>   |              | <b>-8%</b>  |
| 2031  | Market Area | Large-Format | Subject Site | Discount GM |
| Market Area Expenditure Potential - GM (Adjusted) | \$633.0     | \$341.8      | \$240.5      | \$50.6      |
| Share of Local Expenditures                       | 100%        | 54.0%        | 38.0%        | 8.0%        |
| <i>Transfer from Supermarket Spend</i>            | \$22.8      |              | \$22.8       |             |
| Market Expenditures                               | \$655.8     | \$341.8      | \$263.3      | \$50.6      |
| <i>Inflow</i>                                     | \$111.7     | \$11.2       | \$100.5      | \$5.6       |
| Total Market Expenditures                         | \$767.5     | \$353.0      | \$363.9      | \$56.2      |
| Share of Total Market Expenditures                | 100%        | 55%          | 47%          | 7%          |
| Total Sales                                       | \$767.5     | \$353.0      | \$363.9      | \$56.2      |
| Square Footage                                    | 651,700     | 367,500      | 167,000      | 117,200     |
| Baseline Sales per sq. ft.                        |             | \$960.0      | \$2,180.0    | \$480.0     |
| <b>% Change from 2025 Baseline</b>                |             | <b>5%</b>    |              | <b>-1%</b>  |
| 2034  | Market Area | Large-Format | Subject Site | Discount GM |
| Market Area Expenditure Potential - GM (Adjusted) | \$676.2     | \$365.1      | \$256.9      | \$54.1      |
| Share of Local Expenditures                       | 100%        | 54.0%        | 38.0%        | 8.0%        |
| <i>Transfer from Supermarket Spend</i>            | \$18.3      |              | \$18.3       |             |
| Market Expenditures                               | \$694.4     | \$365.1      | \$275.2      | \$54.1      |
| <i>Inflow</i>                                     | \$119.3     | \$11.9       | \$107.4      | \$6.0       |
| Total Market Expenditures                         | \$813.8     | \$377.1      | \$382.6      | \$60.1      |
| Share of Total Market Expenditures                | 100%        | 55%          | 47%          | 7%          |
| Total Sales                                       | \$813.8     | \$377.1      | \$382.6      | \$60.1      |
| Square Footage                                    | 651,700     | 367,500      | 167,000      | 117,200     |
| Baseline Sales per sq. ft.                        |             | \$1,025.0    | \$2,290.0    | \$510.0     |
| <b>% Change from 2025 Baseline</b>                |             | <b>12%</b>   |              | <b>5%</b>   |
| 2037  | Market Area | Large-Format | Subject Site | Discount GM |
| Market Area Expenditure Potential - GM (Adjusted) | \$735.3     | \$397.0      | \$279.4      | \$58.8      |
| Share of Local Expenditures                       | 100%        | 54.0%        | 38.0%        | 8.0%        |
| <i>Transfer from Supermarket Spend</i>            | \$13.3      |              | \$13.3       |             |
| Market Expenditures                               | \$748.6     | \$397.0      | \$292.7      | \$58.8      |
| <i>Inflow</i>                                     | \$129.8     | \$13.0       | \$116.8      | \$6.5       |
| Total Market Expenditures                         | \$878.3     | \$410.0      | \$409.5      | \$65.3      |
| Share of Total Market Expenditures                | 100%        | 55%          | 47%          | 7%          |
| Total Sales                                       | \$878.3     | \$410.0      | \$409.5      | \$65.3      |
| Square Footage                                    | 651,700     | 367,500      | 167,000      | 117,200     |
| Baseline Sales per sq. ft.                        |             | \$1,115.0    | \$2,450.0    | \$555.0     |
| <b>% Change from 2025 Baseline</b>                |             | <b>22%</b>   |              | <b>14%</b>  |

SOURCE: urbanMetrics Inc.

Figure 23 illustrates that any negative impacts on performance levels are estimated to be short-lived, with sales performance returning to pre-entrant levels by 2031, and increasing thereafter. By 2037, market growth is expected to drive increases in sales performance across all GM retailers, with large-format and discount GM retailers' sales per square foot rising by 23.3% and 15.4%, respectively, from the 2025 baseline.

The potential negative impacts of the new store's introduction are mitigated by a significant portion of the market entrant's sales coming from reduced leakages from the Primary Market Area to the Secondary Area or outside the market (an increase in the capture rate), and the presence of this new regional-scale outlet driving visitation from other areas (an increase in the inflow rate).

## Supermarket Impacts

We have also modelled potential impacts on the existing and planned supermarket locations in the Primary Market Area. As mentioned previously, the growth of supermarket competition, driven by expanded food offerings at large-format GM retailers, has shifted spending away from the supermarket & grocery category and into General Merchandise.

It should be noted that the prevalence of this expenditure shift across Canada, and the strong concentration of large-format GM retailers in the Secondary Market Area, including Costco and Costco Business Centres locations, contribute to a base case scenario where many PMA residents are already fulfilling their grocery needs within the General Merchandise category in the Secondary Market Area or at other nearby locations. However, with the introduction of another major GM location in the PMA, it is reasonable to assume there will be a further shift in food expenditure from the Supermarket to the General Merchandise category among PMA residents.

In addition, we have modelled the potential impacts on 80,000 square feet of planned supermarket space identified in the Vision Georgetown Secondary Plan Area to assess the proposed development's impact on the Town's ability to achieve its complete community objectives under that plan. We have also included an allocation of expenditure to the variety of other smaller, often independent food stores in the PMA that play a role in the food system and commercial structure.

As shown in Figure 24, transferring 5% of supermarket expenditures to the proposed development causes a 3% decline in store performance between 2025 and 2028. However, this decline does not impact the potential for planned supermarkets in the Vision Georgetown Secondary Plan Area to open. This model

assumes that a 50,000-square-foot location opens in 2031, followed by another 30,000-square-foot location in 2034.

As shown, despite significant increases in competition from the food component captured in GM spending and the introduction of planned supermarkets, existing major supermarkets are estimated to achieve a 14% improvement in performance relative to the 2025 baseline by 2037.

Figure 24: Market Area Supermarket Sales Transfer Impacts – Selected Periods

| 2025                               | Market Area | Major Supermarkets | Planned Supermarkets | Other Food Stores |
|------------------------------------|-------------|--------------------|----------------------|-------------------|
| Market Area Expenditure Potential  | \$500.1     | \$462.6            |                      | \$37.5            |
| Share of Local Expenditures        | 100.0%      | 92.5%              |                      | 7.5%              |
| Transfer to GM Spend               | \$0.0       |                    |                      |                   |
| Adjusted Market Expenditures       | \$500.1     | \$462.6            |                      | \$37.5            |
| Inflow                             | \$55.6      | \$52.8             |                      | \$2.8             |
| Total Market Expenditures          | \$555.6     | \$515.4            |                      | \$40.3            |
| Share of Total Market Expenditures | 100%        | 92.8%              |                      | 7.3%              |
| Total Sales                        | \$515.4     | \$515.4            |                      | \$40.3            |
| Square Footage                     | 644,200     | 644,200            |                      |                   |
| Baseline Sales per sq. ft.         |             | \$800.0            |                      |                   |
| % Change from 2025 Baseline        |             | 0%                 |                      |                   |

| 2028  | Market Area | Major Supermarkets | Planned Supermarkets | Other Food Stores |
|---|-------------|--------------------|----------------------|-------------------|
| Market Area Expenditure Potential - GM (Adjusted) | \$518.6     | \$466.7            |                      | \$25.9            |
| Share of Category Expenditures                    | 95.0%       | 90.0%              |                      | 5.0%              |
| Transfer to GM Spend 5%                           | \$25.93     |                    |                      |                   |
| Adjusted Market Expenditures                      | \$492.7     | \$443.4            |                      | \$24.6            |
| Inflow  | \$57.6      | \$54.7             |                      | \$2.9             |
| Total Market Expenditures                         | \$550.3     | \$498.1            |                      | \$27.5            |
| Share of Total Market Expenditures                | 100%        | 90.5%              |                      | 5.0%              |
| Total Sales                                       | \$498.1     | \$498.1            |                      | \$27.5            |
| Square Footage                                    | 644,200     | 644,200            |                      |                   |
| Baseline Sales per sq. ft.                        |             | \$775.0            |                      |                   |
| % Change from 2025 Baseline                       |             | -3%                |                      |                   |

| 2031  | Market Area | Major Supermarkets | Planned Supermarkets | Other Food Stores |
|---|-------------|--------------------|----------------------|-------------------|
| Market Area Expenditure Potential - GM (Adjusted) | \$570.0     | \$458.8            | \$59.8               | \$28.5            |
| Share of Category Expenditures                    | 96.0%       | 80.5%              | 10.5%                | 5.0%              |
| Transfer to GM Spend 4%                           | \$22.80     |                    |                      |                   |
| Adjusted Market Expenditures                      | \$547.2     | \$440.5            | \$57.5               | \$27.4            |
| Inflow  | \$59.8      | \$53.8             | \$4.5                | \$1.5             |
| Total Market Expenditures                         | \$607.0     | \$494.3            | \$61.9               | \$28.9            |
| Share of Total Market Expenditures                | 100%        | 81.4%              | 11.1%                | 4.8%              |
| Total Sales                                       | \$556.3     | \$494.3            | \$61.9               | \$28.9            |
| Square Footage                                    | 694,200     | 644,200            | 50,000               |                   |
| Baseline Sales per sq. ft.                        |             | \$765.0            | \$1,240.0            |                   |
| % Change from 2025 Baseline                       |             | -4%                |                      |                   |

| 2034  | Market Area | Major Supermarkets | Planned Supermarkets | Other Food Stores |
|---|-------------|--------------------|----------------------|-------------------|
| Market Area Expenditure Potential - GM (Adjusted) | \$609.6     | \$493.8            | \$67.1               | \$30.5            |
| Share of Category Expenditures                    | 97.0%       | 81.0%              | 11.0%                | 5.0%              |
| Transfer to GM Spend 3%                           | \$18.29     |                    |                      |                   |
| Adjusted Market Expenditures                      | \$591.3     | \$479.0            | \$65.0               | \$29.6            |
| Inflow  | \$60.3      | \$54.3             | \$4.5                | \$1.5             |
| Total Market Expenditures                         | \$651.6     | \$533.3            | \$69.6               | \$31.1            |
| Share of Total Market Expenditures                | 100%        | 81.8%              | 11.5%                | 4.8%              |
| Total Sales                                       | \$602.8     | \$533.3            | \$69.6               | \$31.1            |
| Square Footage                                    | 724,200     | 644,200            | 80,000               |                   |
| Baseline Sales per sq. ft.                        |             | \$830.0            | \$870.0              |                   |
| % Change from 2025 Baseline                       |             | 4%                 |                      |                   |

| 2037  | Market Area | Major Supermarkets | Planned Supermarkets | Other Food Stores |
|---|-------------|--------------------|----------------------|-------------------|
| Market Area Expenditure Potential - GM (Adjusted) | \$664.3     | \$541.4            | \$76.4               | \$33.2            |
| Share of Category Expenditures                    | 98.0%       | 81.5%              | 11.5%                | 5.0%              |
| Transfer to GM Spend 2%                           | \$13.29     |                    |                      |                   |
| Adjusted Market Expenditures                      | \$651.0     | \$530.5            | \$74.9               | \$32.5            |
| Inflow  | \$61.7      | \$55.5             | \$4.6                | \$1.5             |
| Total Market Expenditures                         | \$712.7     | \$586.1            | \$79.5               | \$34.1            |
| Share of Total Market Expenditures                | 100%        | 82.2%              | 11.9%                | 4.8%              |
| Total Sales                                       | \$665.6     | \$586.1            | \$79.5               | \$34.1            |
| Square Footage                                    | 724,200     | 644,200            | 80,000               |                   |
| Baseline Sales per sq. ft.                        |             | \$910.0            | \$995.0              |                   |
| % Change from 2025 Baseline                       |             | 14%                |                      |                   |

SOURCE: urbanMetrics Inc.

# 7 Conclusions

---

## 7.1 Residual Market Opportunity

The projected growth in spending within the General Merchandise category is sufficient to support a significant new entrant without negatively impacting existing commercial areas or other large-format GM retailers. There remain other opportunities for smaller entrants across the retail spectrum. Two primary factors drive these opportunities:

- Increases in population growth in the Market Area
- A relative lack of large-format GM competition in the Primary Market Area.

Overall expenditures in the Market Area, after adjusting for capture rates and inflow expenditures, are projected to increase from \$2,445.1 million in 2025 to \$3,526.8 million in 2037, an increase of more than \$1,081 million. In the GM category, 2025 sales of \$393.9 million are projected to increase to approximately \$694.6 million in 2028 when the Subject Site begins to influence the market, and further to approximately \$865 million by 2037.

This increase is driven by population growth and by the introduction of this large-format GM outlet on the subject site, allowing a larger proportion of resident expenditures in this category to occur within the Primary Area, supporting both new and existing retailers. In addition, the introduction of the largest single retailer in the market, at 167,000 square feet, will drive inflow spending from visitors outside the Market Area.

## 7.2 Sales Transfers

Assuming national-average sales performance as a 2025 baseline and a store opening in 2028, the introduction of another large-format GM retailer on the Subject Site is projected to have minimal short-term impact on the sales per square foot performance of existing GM retailers. However, this impact is projected to become neutral within three years, with all existing retailers able to meet or exceed current performance levels by 2031.

This analysis assumed an introductory elevated sales performance of \$2,060 per square foot for a new large-format GM retailer on the Subject Site. This is

significantly higher than the \$915 per square foot assumed for existing large-format GM retailers and \$485 for discount GM retailers. This assumption was made as a conservative measure to stress-test the market's response to a highly significant, extremely competitive new entrant.

The introduction of a 167,000-square-foot large-format GM store on the Subject Site is projected to reduce the short-term sales-per-square-foot performance levels of discount GM retailers by 8% in 2028, and by 1% in 2031. Large-format GM retailers are expected to experience minimal declines in sales performance, with a 2% decline in 2028, growth moderated to 5% by 2031, and rising to 12% above 2025 baselines by 2034. Market growth and increases in sales performance are projected to continue from 2031 through 2037, with potential increases of 22% and 14% from 2025 levels by 2037 in large-format and discount GM expenditures, respectively.

## 7.3 Market Impacts

The expenditure analysis summarized in Figure 22 demonstrates that there is sufficient market opportunity to support the introduction of an additional large-format General Merchandise retailer, on the Subject Site, without any negative impacts on the functions of existing commercial areas or other GM retailers.

In 2025, the Primary Market Area is underrepresented in the large-format GM category, with recent residential growth in Halton Hills and Milton outpacing commercial development in this category, and a significant proportion of residents' GM expenditures likely occurring at large-format retailers outside of the Primary Market Area.

As these communities that comprise the Primary Market Area continue to grow, the additional expenditure potential will create an even greater market opportunity for the retailer on the Subject Site and other large-format GM retailers than exists today.

The sales transfer analysis shown in Figure 23 demonstrates that even if the large-format retailer on the Subject Site achieves higher performance levels, existing GM retailers will be able to mitigate short-term sales performance impacts by continuing to capture market growth and serving the growing needs of Halton Hills and Milton.

In addition, the sales transfer analysis shown in Figure 24 highlights the impact of a 5% transfer of sales from supermarket expenditures to the Subject Site. This analysis shows that, even with PMA residents buying a larger proportion of their food at GM retailers, short-term impacts are limited to a 3% decline in sales

performance at existing full-service supermarkets, and the introduction of planned supermarkets in the Vision Georgetown Secondary Plan Area is likely to have a larger negative impact than the introduction of a Warehouse Membership Club on the Subject Site.

Combined, the expenditure analysis and sales transfer analysis demonstrate that the development of a 167,000-square-foot large-format GM retailer on the Subject Site will not cause significant long-term negative impacts on the function of existing commercial areas or on existing retailers.

The remaining approximately 60,000 square feet of commercial space proposed on the Subject Site is limited in scale and will serve a distinct market segment of drive-by traffic and employees within the nearby Employment Area, including the future employees on the Subject Site. For these reasons, it is unlikely that the smaller commercial units comprising the additional 60,000 square feet of commercial space will cause any negative impacts on existing retailers or the function of existing commercial areas.

# A1 Retail Expenditure Inputs

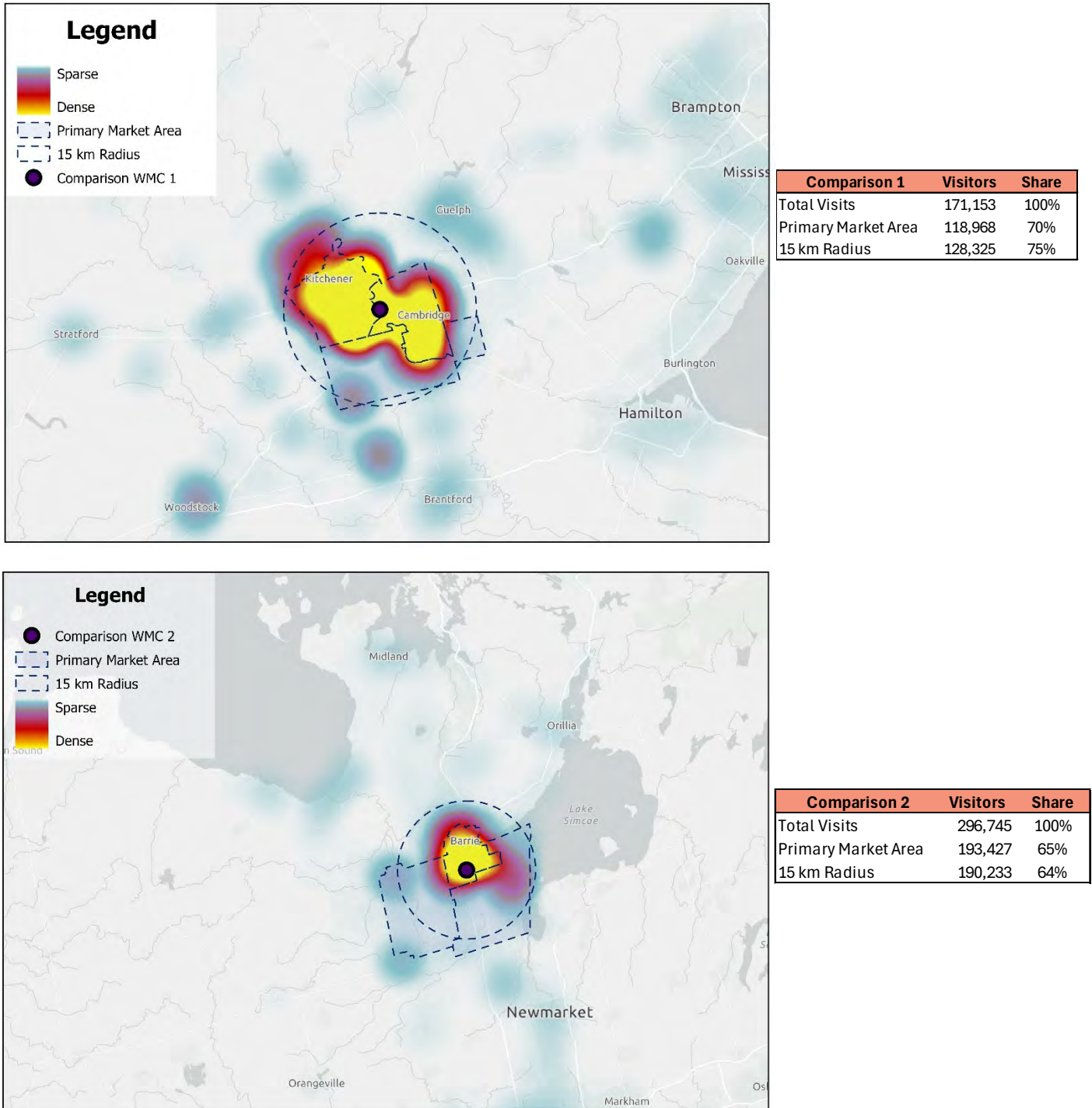
Figure 25: Capture Rate Calculations

| Primary Market Area                          | 2025                      |              | 2026                      |              | 2027                      |              | 2028                      |              | 2029                      |              | 2030                      |              | 2031                      |              | 2032                      |              | 2033                      |              | 2034                      |              | 2035                      |              | 2036                      |              | 2037                      |              | 2038                      |              |                           |              |           |       |
|--|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|---------------------------|--------------|-----------|-------|
|  | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate | Expenditures (\$Millions) | Capture Rate |           |       |
| <b>Food Store Retail (FSR)</b>               | \$892.4                   | 80.0%        | \$801.5                   | 80.0%        | \$717.2                   | 80.0%        | \$623.0                   | 80.0%        | \$773.8                   | 80.0%        | \$653.3                   | 80.0%        | \$521.3                   | 80.0%        | \$685.2                   | 80.0%        | \$590.5                   | 80.0%        | \$726.7                   | 80.0%        | \$625.6                   | 80.0%        | \$517.0                   | 80.0%        | \$625.6                   | 80.0%        | \$517.0                   | 80.0%        | \$625.6                   | 80.0%        | \$517.0   | 80.0% |
| Supermarket & Grocery Stores                 | \$475.6                   | 80.0%        | \$426.0                   | 80.0%        | \$402.6                   | 80.0%        | \$353.4                   | 80.0%        | \$453.3                   | 80.0%        | \$384.4                   | 80.0%        | \$312.9                   | 80.0%        | \$415.5                   | 80.0%        | \$370.5                   | 80.0%        | \$457.7                   | 80.0%        | \$365.6                   | 80.0%        | \$317.0                   | 80.0%        | \$365.6                   | 80.0%        | \$317.0                   | 80.0%        | \$365.6                   | 80.0%        | \$317.0   | 80.0% |
| Convenience & Specialty Food Stores          | \$88.9                    | 80.0%        | \$71.2                    | 80.0%        | \$62.1                    | 80.0%        | \$53.7                    | 80.0%        | \$64.4                    | 80.0%        | \$55.1                    | 80.0%        | \$46.6                    | 80.0%        | \$57.5                    | 80.0%        | \$48.7                    | 80.0%        | \$59.7                    | 80.0%        | \$50.8                    | 80.0%        | \$42.0                    | 80.0%        | \$50.8                    | 80.0%        | \$42.0                    | 80.0%        | \$50.8                    | 80.0%        | \$42.0    | 80.0% |
| Brew, Wine and Liquor Stores                 | \$127.9                   | 80.0%        | \$102.3                   | 80.0%        | \$132.4                   | 80.0%        | \$95.9                    | 80.0%        | \$142.9                   | 80.0%        | \$112.9                   | 80.0%        | \$142.9                   | 80.0%        | \$112.9                   | 80.0%        | \$142.9                   | 80.0%        | \$112.9                   | 80.0%        | \$142.9                   | 80.0%        | \$112.9                   | 80.0%        | \$142.9                   | 80.0%        | \$112.9                   | 80.0%        | \$142.9                   | 80.0%        | \$112.9   | 80.0% |
| <b>Selected Non-Food Store Retail (NFSR)</b> | \$127.6                   | 80.0%        | \$1,297.2                 | 80.0%        | \$1,277.9                 | 80.0%        | \$1,434.4                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3                 | 80.0%        | \$1,317.3 | 80.0% |
| General Merchandise                          | \$29.4                    | 80.0%        | \$17.6                    | 80.0%        | \$48.4                    | 80.0%        | \$79.8                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4                    | 80.0%        | \$59.4    | 80.0% |
| Health & Personal Care Stores                | \$206.8                   | 80.0%        | \$237.4                   | 80.0%        | \$307.4                   | 80.0%        | \$246.0                   | 80.0%        | \$315.5                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3                   | 80.0%        | \$230.3   | 80.0% |
| Miscellaneous Retailers                      | \$268.1                   | 80.0%        | \$64.9                    | 80.0%        | \$708.6                   | 80.0%        | \$566.9                   | 80.0%        | \$704.1                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3                   | 80.0%        | \$611.3   | 80.0% |
| <b>Total</b>                                 | \$2,408.8                 |              | \$1,981.7                 |              | \$2,495.1                 |              | \$2,098.5                 |              | \$2,990.8                 |              | \$2,354.4                 |              | \$2,354.4                 |              | \$2,354.4                 |              | \$2,354.4                 |              | \$2,354.4                 |              | \$2,354.4                 |              | \$2,354.4                 |              | \$2,354.4                 |              | \$2,354.4                 |              | \$2,354.4                 |              | \$2,354.4 |       |
| <b>Secondary Market Area</b>                 |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |                           |              |           |       |
| <b>Food Store Retail (FSR)</b>               | \$348.6                   | 30.0%        | \$341.9                   | 30.0%        | \$344.9                   | 30.0%        | \$399.5                   | 30.0%        | \$381.0                   | 30.0%        | \$414.3                   | 30.0%        | \$377.2                   | 30.0%        | \$397.7                   | 30.0%        | \$418.3                   | 30.0%        | \$445.2                   | 30.0%        | \$445.2                   | 30.0%        | \$445.2                   | 30.0%        | \$445.2                   | 30.0%        | \$445.2                   | 30.0%        | \$445.2                   | 30.0%        | \$445.2   | 30.0% |
| Supermarket & Grocery Stores                 | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9                   | 30.0%        | \$184.9   | 30.0% |
| Convenience & Specialty Food Stores          | \$44.9                    | 30.0%        | \$44.9                    | 30.0%        | \$46.9                    | 30.0%        | \$41.1                    | 30.0%        | \$46.9                    | 30.0%        | \$41.1                    | 30.0%        | \$46.9                    | 30.0%        | \$41.1                    | 30.0%        | \$46.9                    | 30.0%        | \$41.1                    | 30.0%        | \$46.9                    | 30.0%        | \$41.1                    | 30.0%        | \$46.9                    | 30.0%        | \$41.1                    | 30.0%        | \$46.9                    | 30.0%        | \$41.1    | 30.0% |
| Brew, Wine and Liquor Stores                 | \$64.6                    | 30.0%        | \$9.4                     | 30.0%        | \$67.4                    | 30.0%        | \$2.2                     | 30.0%        | \$70.4                    | 30.0%        | \$2.1                     | 30.0%        | \$73.4                    | 30.0%        | \$2.4                     | 30.0%        | \$76.4                    | 30.0%        | \$2.0                     | 30.0%        | \$79.4                    | 30.0%        | \$2.0                     | 30.0%        | \$82.4                    | 30.0%        | \$2.0                     | 30.0%        | \$85.4                    | 30.0%        | \$2.0     | 30.0% |
| <b>Selected Non-Food Store Retail (NFSR)</b> | \$914.0                   | 20.0%        | \$246.0                   | 20.0%        | \$854.1                   | 20.0%        | \$308.3                   | 20.0%        | \$986.3                   | 20.0%        | \$211.9                   | 20.0%        | \$1,039.7                 | 20.0%        | \$336.0                   | 20.0%        | \$1,085.5                 | 20.0%        | \$398.8                   | 20.0%        | \$1,085.5                 | 20.0%        | \$398.8                   | 20.0%        | \$1,085.5                 | 20.0%        | \$398.8                   | 20.0%        | \$1,085.5                 | 20.0%        | \$398.8   | 20.0% |
| General Merchandise                          | \$281.9                   | 20.0%        | \$6.4                     | 20.0%        | \$284.3                   | 20.0%        | \$10.4                    | 20.0%        | \$286.3                   | 20.0%        | \$10.4                    | 20.0%        | \$286.3                   | 20.0%        | \$10.4                    | 20.0%        | \$286.3                   | 20.0%        | \$10.4                    | 20.0%        | \$286.3                   | 20.0%        | \$10.4                    | 20.0%        | \$286.3                   | 20.0%        | \$10.4                    | 20.0%        | \$286.3                   | 20.0%        | \$10.4    | 20.0% |
| Health & Personal Care Stores                | \$138.1                   | 20.0%        | \$17.4                    | 20.0%        | \$136.0                   | 20.0%        | \$8.5                     | 20.0%        | \$138.1                   | 20.0%        | \$8.5                     | 20.0%        | \$138.1                   | 20.0%        | \$8.5                     | 20.0%        | \$138.1                   | 20.0%        | \$8.5                     | 20.0%        | \$138.1                   | 20.0%        | \$8.5                     | 20.0%        | \$138.1                   | 20.0%        | \$8.5                     | 20.0%        | \$138.1                   | 20.0%        | \$8.5     | 20.0% |
| Miscellaneous Retailers                      | \$596.3                   | 20.0%        | \$109.3                   | 20.0%        | \$598.2                   | 20.0%        | \$141.1                   | 20.0%        | \$597.9                   | 20.0%        | \$141.1                   | 20.0%        | \$597.9                   | 20.0%        | \$141.1                   | 20.0%        | \$597.9                   | 20.0%        | \$141.1                   | 20.0%        | \$597.9                   | 20.0%        | \$141.1                   | 20.0%        | \$597.9                   | 20.0%        | \$141.1                   | 20.0%        | \$597.9                   | 20.0%        | \$141.1   | 20.0% |
| <b>Total</b>                                 | \$1,293.6                 |              | \$590.9                   |              | \$1,319.0                 |              | \$417.8                   |              | \$1,377.3                 |              | \$436.2                   |              | \$1,427.4                 |              | \$465.3                   |              | \$1,500.7                 |              | \$475.9                   |              | \$1,500.7                 |              | \$475.9                   |              | \$1,500.7                 |              | \$475.9                   |              | \$1,500.7                 |              | \$475.9   |       |

Figure 26: Inflow Calculations

| 2025   | Resident Expenditures (\$Millions) | Inflow | Total Expenditures (\$Millions) | 2031   | Resident Expenditures (\$Millions) | Inflow | Total Expenditures (\$Millions) |
|--|------------------------------------|--------|---------------------------------|--|------------------------------------|--------|---------------------------------|
| <b>Food Store Retail (FSR)</b>               | <b>\$706.4</b>                     |        | <b>\$784.8</b>                  | <b>Food Store Retail (FSR)</b>               | <b>\$799.5</b>                     |        | <b>\$884.8</b>                  |
| Supermarkets & Grocery Stores                | \$500.1                            | 10.0%  | \$555.6                         | Supermarkets & Grocery Stores                | \$570.0                            | 9.5%   | \$629.8                         |
| Convenience & Specialty Food Stores          | \$84.6                             | 10.0%  | \$94.0                          | Convenience & Specialty Food Stores          | \$94.2                             | 10.0%  | \$104.6                         |
| Beer, Wine and Liquor Stores                 | \$121.6                            | 10.0%  | \$135.2                         | Beer, Wine and Liquor Stores                 | \$135.4                            | 10.0%  | \$150.4                         |
| <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$1,514.0</b>                   |        | <b>\$1,660.3</b>                | <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$1,901.0</b>                   |        | <b>\$2,153.6</b>                |
| General Merchandise                          | \$374.2                            | 5.0%   | \$393.9                         | General Merchandise                          | \$633.0                            | 15.0%  | \$744.7                         |
| Health & Personal Care Stores                | \$285.0                            | 10.0%  | \$316.7                         | Health & Personal Care Stores                | \$317.1                            | 10.0%  | \$352.3                         |
| Miscellaneous Retailers                      | \$197.9                            | 10.0%  | \$219.9                         | Miscellaneous Retailers                      | \$220.2                            | 10.0%  | \$244.7                         |
| Other  | \$656.8                            | 10.0%  | \$729.8                         | Other  | \$730.7                            | 10.0%  | \$811.9                         |
| <b>Total</b>                                 | <b>\$2,220.3</b>                   |        | <b>\$2,445.1</b>                | <b>Total</b>                                 | <b>\$2,700.5</b>                   |        | <b>\$3,038.4</b>                |
| 2028   | Resident Expenditures (\$Millions) | Inflow | Total Expenditures (\$Millions) | 2034   | Resident Expenditures (\$Millions) | Inflow | Total Expenditures (\$Millions) |
| <b>Food Store Retail (FSR)</b>               | <b>\$732.5</b>                     |        | <b>\$813.9</b>                  | <b>Food Store Retail (FSR)</b>               | <b>\$855.0</b>                     |        | <b>\$942.6</b>                  |
| Supermarkets & Grocery Stores                | \$518.6                            | 10.0%  | \$576.2                         | Supermarkets & Grocery Stores                | \$609.6                            | 9.0%   | \$669.9                         |
| Convenience & Specialty Food Stores          | \$87.8                             | 10.0%  | \$97.5                          | Convenience & Specialty Food Stores          | \$100.7                            | 10.0%  | \$111.9                         |
| Beer, Wine and Liquor Stores                 | \$126.1                            | 10.0%  | \$140.2                         | Beer, Wine and Liquor Stores                 | \$144.7                            | 10.0%  | \$160.8                         |
| <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$1,772.5</b>                   |        | <b>\$2,008.1</b>                | <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$2,031.4</b>                   |        | <b>\$2,301.3</b>                |
| General Merchandise                          | \$590.4                            | 15.0%  | \$694.6                         | General Merchandise                          | \$676.2                            | 15.0%  | \$795.5                         |
| Health & Personal Care Stores                | \$295.6                            | 10.0%  | \$328.4                         | Health & Personal Care Stores                | \$338.9                            | 10.0%  | \$376.5                         |
| Miscellaneous Retailers                      | \$205.3                            | 10.0%  | \$228.1                         | Miscellaneous Retailers                      | \$235.3                            | 10.0%  | \$261.5                         |
| Other  | \$681.2                            | 10.0%  | \$756.9                         | Other  | \$781.0                            | 10.0%  | \$867.8                         |
| <b>Total</b>                                 | <b>\$2,505.0</b>                   |        | <b>\$2,822.0</b>                | <b>Total</b>                                 | <b>\$2,886.4</b>                   |        | <b>\$3,243.9</b>                |
| 2037   | Resident Expenditures (\$Millions) | Inflow | Total Expenditures (\$Millions) | 2037   | Resident Expenditures (\$Millions) | Inflow | Total Expenditures (\$Millions) |
| <b>Food Store Retail (FSR)</b>               | <b>\$931.4</b>                     |        | <b>\$1,022.8</b>                | <b>Food Store Retail (FSR)</b>               | <b>\$931.4</b>                     |        | <b>\$1,022.8</b>                |
| Supermarkets & Grocery Stores                | \$664.3                            | 8.5%   | \$726.0                         | Supermarkets & Grocery Stores                | \$664.3                            | 8.5%   | \$726.0                         |
| Convenience & Specialty Food Stores          | \$109.6                            | 10.0%  | \$121.8                         | Convenience & Specialty Food Stores          | \$109.6                            | 10.0%  | \$121.8                         |
| Beer, Wine and Liquor Stores                 | \$157.5                            | 10.0%  | \$175.0                         | Beer, Wine and Liquor Stores                 | \$157.5                            | 10.0%  | \$175.0                         |
| <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$2,210.3</b>                   |        | <b>\$2,504.0</b>                | <b>Selected Non-Food Store Retail (NFSR)</b> | <b>\$2,210.3</b>                   |        | <b>\$2,504.0</b>                |
| General Merchandise                          | \$735.3                            | 15.0%  | \$865.0                         | General Merchandise                          | \$735.3                            | 15.0%  | \$865.0                         |
| Health & Personal Care Stores                | \$368.8                            | 10.0%  | \$409.8                         | Health & Personal Care Stores                | \$368.8                            | 10.0%  | \$409.8                         |
| Miscellaneous Retailers                      | \$256.2                            | 10.0%  | \$284.6                         | Miscellaneous Retailers                      | \$256.2                            | 10.0%  | \$284.6                         |
| Other  | \$850.1                            | 10.0%  | \$944.5                         | Other  | \$850.1                            | 10.0%  | \$944.5                         |
| <b>Total</b>                                 | <b>\$3,141.7</b>                   |        | <b>\$3,526.8</b>                | <b>Total</b>                                 | <b>\$3,141.7</b>                   |        | <b>\$3,526.8</b>                |

Figure 27: GM & WMC Inflow Assumption Analysis



**Figure 28: Regression Equations**

---

|      |           |   |         |                        |
|------|-----------|---|---------|------------------------|
| FSR  | Y= 108.25 | - | 0.086 X | where x = income index |
| NFSR | Y= 92.11  | + | 0.076 X | where x = income index |

## A2 Peer Review Response



# Response to TR Peer Review – Retail Market Impact Analysis

---

To: Jessica Rahim – Senior Planner, Development Town of Halton Hills

---

Cc: James Tate – Tate Research

---

From: Tywen Thomas & Douglas Annand – urbanMetrics Inc.

---

Date: April 2, 2026

---

Re: 9094 Regional Road 25, Halton Hills, Ontario

---

## 1.0 Background

---

urbanMetrics Inc. has prepared the following response to the peer review letter dated March 13, 2026, prepared by Tate Research (“TR”) on behalf of the Town of Halton Hills. We address each of TR’s eleven comments in the order in which they were raised. Where revisions to the Retail Market Impact Analysis (the “Report”) have been made in response, the relevant sections and figures are identified.

## 2.0 Peer Review Responses

---

### 2.1 No Food Store Impacts

TR notes that the original Report did not include an analysis of the expected impacts on existing or planned food stores and requests that a supermarket impact assessment be undertaken with specific consideration of the planned supermarkets in the Vision Georgetown Secondary Plan Area.

We acknowledge that the assessment of potential impacts on Supermarkets & Grocery stores was not within the original scope of our assessment. Following TR's comments, our study scope has been expanded, and a supermarket impact analysis has been incorporated into the revised Report. The specific additions are as follows:

- Section 4.1 and the revised Figure 12 now include an inventory of major supermarket locations in the Primary Market Area.
- Section 6.4 includes a dedicated sub-section, "Supermarket Impacts," describing the methodology and assumptions applied.
- Figure 24 presents the Market Area Supermarket Sales Transfer Impacts for selected periods to 2037, including an explicit assessment of impact on the planned supermarkets in the Vision Georgetown Secondary Plan Area.

As shown in Figure 24, a 5% transfer of supermarket expenditures to the proposed development at opening results in a 3% short-term decline in existing supermarket sales performance. This is well below the 10–15% threshold generally considered a threat to financial viability.

Existing supermarkets are projected to fully recover and to achieve sales performance increases 14% above their 2025 baseline level by 2037. Our analysis further demonstrates that the proposed development's opening does not impair the market viability of the planned supermarkets in the Vision Georgetown Secondary Plan Area.

## **2.2 Costco Business Centre, Northwest Mississauga**

TR notes that a Costco Business Centre opened at SmartCentres Meadowvale in October 2025 and requests that it be specifically referenced in the analysis regarding its scale, type of operation, customer draw, and anticipated sales transfers.

The Costco Business Centre at Winston Churchill Road and Highway 401 is referenced in Section 4.1 of the revised report and is shown in Figure 11. While this location is accessible to all Costco members and forms part of the competitive environment for PMA residents, especially those in Milton, Costco Business Centres primarily target business customers and offer a product selection that differs from a consumer-focused Warehouse Membership Club, emphasizing bulk commercial

supplies, foodservice quantities, and business-specific categories. Because of this, it is not directly comparable to the proposed warehouse membership club on the subject site when considering the expected inflow or any potential sales transfer or impact assessment.

## 2.3 Canadian Tire, Georgetown

TR identifies that the Canadian Tire store in Georgetown was omitted from the description of competitive locations in Section 4 and from the map in Figure 11 of the original Report.

We confirm this was a narrative issue rather than an analytical error. The Georgetown Canadian Tire was included in the back-end calculations of existing competitive space throughout the original analysis. Consistent with both versions of the report, this location accounts for approximately 76,300 square feet of the 367,500 square feet of existing large-format GM retail space in the PMA, as reflected in the square footage inputs underpinning Figure 23. No changes to the quantitative analysis were necessary as a result of this correction, and Section 4.1 and Figure 11 have been updated to explicitly reference this location.

## 2.4 Regression Equation & Expenditure Calculation

TR calculates a Primary Market Area NFSR per capita expenditure of \$2,304 in General Merchandise stores and suggests that our Report may have overstated GM expenditures by approximately 7%. TR's calculation applies the income index as a decimal ( $X = 0.91$ ) in the regression equation, producing an index value of 92.18 and a resulting GM per capita of \$2,304.

TR's calculation is inconsistent with the indexing approach used in our analysis. Our methodology uses 100 as the base index number, not 1. The regression equation for NFSR expenditure, as shown in Figure 28 of the Report, is:

$$Y = 92.11 + (0.076 \times X)$$

where  $X$  is the income index for the Market Area expressed as a percentage of the provincial average, with the provincial average equal to 100. The equation relates to Non-Food Store Retail expenditure in aggregate. We do not maintain individual regression models for each NFSR sub-category. GM per capita expenditures are

subsequently derived by applying the provincial GM share of NFSR spending (30.8%) to the NFSR per capita result.

The Primary Market Area average per capita income of \$40,842.35 represents 91.27% of the Ontario provincial average of \$44,747. Substituting this index value into the regression equation:

$$92.11 + (0.076 \times 91.27) = 99.046$$

This result indicates that per capita NFSR spending in the Primary Market Area is estimated at 99.046% of the provincial average. Applying this to the Ontario NFSR per capita of \$8,105.60:

$$0.99046 \times \$8,105.60 = \$8,028$$

This figure supports Figure 16 and does not confirm the 7% overstatement identified by TR. TR's calculation of 92.18 results from substituting  $X = 0.91$  instead of  $X = 91.27$  into the equation and treating the income index as a unit proportion rather than an index number scaled to 100, which is inconsistent with the equation as specified in Figure 28.

## 2.5 Per Capita Expenditure Growth Rate

TR notes that the per capita expenditure growth rates in the original Report escalated from 0.25% per year in the near term to 1.00% per year by the end of the study period, and requests either a rationale or a revision to a consistent rate.

The analysis has been revised to address the formula error that resulted in inconsistent annual growth rates, and we have now applied a consistent growth rate of 0.25% per annum, un compounded, throughout the study period. All downstream expenditure figures have been adjusted accordingly.

## 2.6 Expenditure Potential by Category

TR calculates that the Secondary Market Area GM expenditure potential in 2025 should be \$282.0 million rather than the \$275.0 million reported in Figure 18 of the original Report, and requests confirmation of the figures.

The discrepancy in the original Report stemmed from the same formulaic mistake described in Comment 2.5. After correcting the per capita growth rate methodology, the revised 2025 Secondary Market Area GM expenditure is \$281.9

million, within rounding tolerance of TR's independently calculated figure of \$282.0 million. Our original figure of \$275.0 million has been updated throughout the revised Report and underlying model.

## **2.7 Expenditures in the Market Area – Part 1**

TR notes that applying the capture rates shown in Figure 20 directly to the total expenditure figures in Figure 19 does not reproduce the adjusted expenditure figures in Figure 20 and requests verification of the calculations.

The capture rates shown in Figure 20 are combined output values, not direct inputs for the model. The underlying model applies separate capture rates to the Primary Market Area (PMA) and the Secondary Market Area (SMA). The overall rate in Figure 20 indicates the proportion of total expenditures (PMA plus SMA) that occurs within the PMA, rounded to the nearest 0.025 for clarity. Since this is a calculated, rounded result rather than an input, it cannot be directly applied to Figure 19 to replicate the adjusted totals in Figure 20.

The full capture rate calculations showing the individual PMA and SMA rates applied at each period are disclosed in Figure 25 of Appendix A1. The adjusted expenditure figures in Figure 20 are derived by applying the rates in Figure 25, not those displayed in Figure 20 itself.

## **2.8 Expenditures in the Market Area – Part 2**

TR notes that the GM capture rate increases from 57.5% in 2025 to 70.0% in 2028, and holds constant through 2031 through 2034, then increases again to 72.5% in 2037. TR requests a rationale for the further increase in 2037, or a revision to hold the rate constant.

This comment should be read alongside Comment 2.7. As noted earlier, the capture rates shown in Figure 20 are combined, rounded outputs rather than fixed inputs. The apparent increase in the GM capture rate in 2037 is not due to any change in discretionary assumptions during that period. Instead, it results mechanically from the blended calculation: as the Primary Market Area expands more quickly than the

Secondary Market Area, a larger share of total expenditure comes from PMA residents, who have a higher capture rate. Even if the underlying PMA and SMA rates stay the same from 2028 onwards, this demographic shift gradually raises the displayed blended rate.

Despite this explanation, we have accepted TR's recommendation to review the post-opening capture rate assumptions. We confirm that the individual capture rates for the Primary and Secondary Market Areas remain constant after the proposed development opens in 2028, except in the Supermarket & Grocery category, where rates stay constant after the first planned Vision Georgetown supermarket opens in 2031. The individual rates used at each period are shown in the revised Figure 25 of Appendix A1.

## 2.9 Capture Rate Inconsistencies

TR notes that the 2025 GM capture rate shown in the original Figure 24 (Capture Rate Calculations) appeared to be 70% — which TR assumed was a typo — while the 2025 GM capture rate shown in Figure 20 was 57.5%, and requests clarification as to which rate was appropriate.

The inconsistency identified by TR stemmed from the same blended-rate methodology described in Comment 2.7, further complicated by a labelling error in the original Figure 24. The 70% figure in the original appendix represented the PMA-only capture rate; the 57.5% in Figure 20 was the blended PMA/SMA rate. Presenting these two different rates under the same label without clarification was confusing. The appendix has been reorganized in the revised Report: Figure 25 now displays the full capture rate calculations with PMA and SMA rates shown separately and clearly labelled, eliminating the ambiguity TR highlighted.

## 2.10 Inflow Estimates

TR notes that the inflow estimates in the original Report were not supported by customer research data and recommends examining mobility data from nearby Costco stores to provide evidentiary support for the inflow assumptions.

In response to TR's recommendation, we have examined mobility data at two consumer-facing Warehouse Membership Club locations in Ontario. This analysis is presented in Figure 27 of Appendix A1. Both comparison locations demonstrate that inflow, defined as visits originating from outside a defined primary trade area,

exceeds 25% of total visits at the individual commercial node anchored by the WMC.

The Costco Business Centre at Winston Churchill Road and Highway 401 was considered a potential comparison location but was found insufficiently comparable for the reasons outlined in our response to Comment 2.2. The two consumer-facing WMC locations used in the analysis offer a more suitable basis for estimating inflow at a household-oriented Warehouse Membership Club.

Despite the support from the comparables for inflow rates exceeding 25%, the rates used in our revised analysis are conservatively held at 15% from when the store is assumed to open in 2028 to 2037. This method accounts for the strong presence of large-format GM retailers across the Secondary Market Area, which limits the additional regional attraction that the proposed development can generate, and prevents the analysis from overstating the available market support.

## 2.11 Sales Performance Level Assumption

TR requests information on how the \$1,750-per-square-foot sales volume for the proposed large-format GM store used in the previous analysis was derived.

The original \$1,750-per-square-foot figure was derived from a review of performance data across a range of large-format, warehouse-style bulk-product retailers in Canada. To ensure the analysis reflects the most directly comparable benchmarks, the sales performance figure has been revised to \$2,060 per square foot in the updated impact analysis.

The revised figure of \$2,060 per square foot is consistent with annual sales per square foot at leading Warehouse Membership Club locations in Canada. Based on publicly available information, average store performance is between \$2,100 and \$2,250 per square foot, with an average store size of approximately 147,000 square feet. As such, \$2,060 reflects a realistic operating expectation for a new store in a supply-constrained market.

Despite this upward revision in the modelled performance level, the updated analysis shows that short-term impacts on existing large-format GM retailers remain limited to a 2% decline in sales per square foot. This is below the 10–15% threshold typically applied in municipal retail impact analyses, and all negative impacts are fully absorbed by expected future market growth within the study period.

## 3.0 Conclusion

---

We trust that the foregoing responses and the accompanying revised Report address TR's comments in full. We remain available to meet with TR and Town staff to discuss any of the above at your convenience.

Respectfully Submitted,



Tywen Thomas MSc. PLE  
Associate Partner  
urbanMetrics Inc.



Douglas R. Annand, PLE  
Partner  
urbanMetrics Inc.