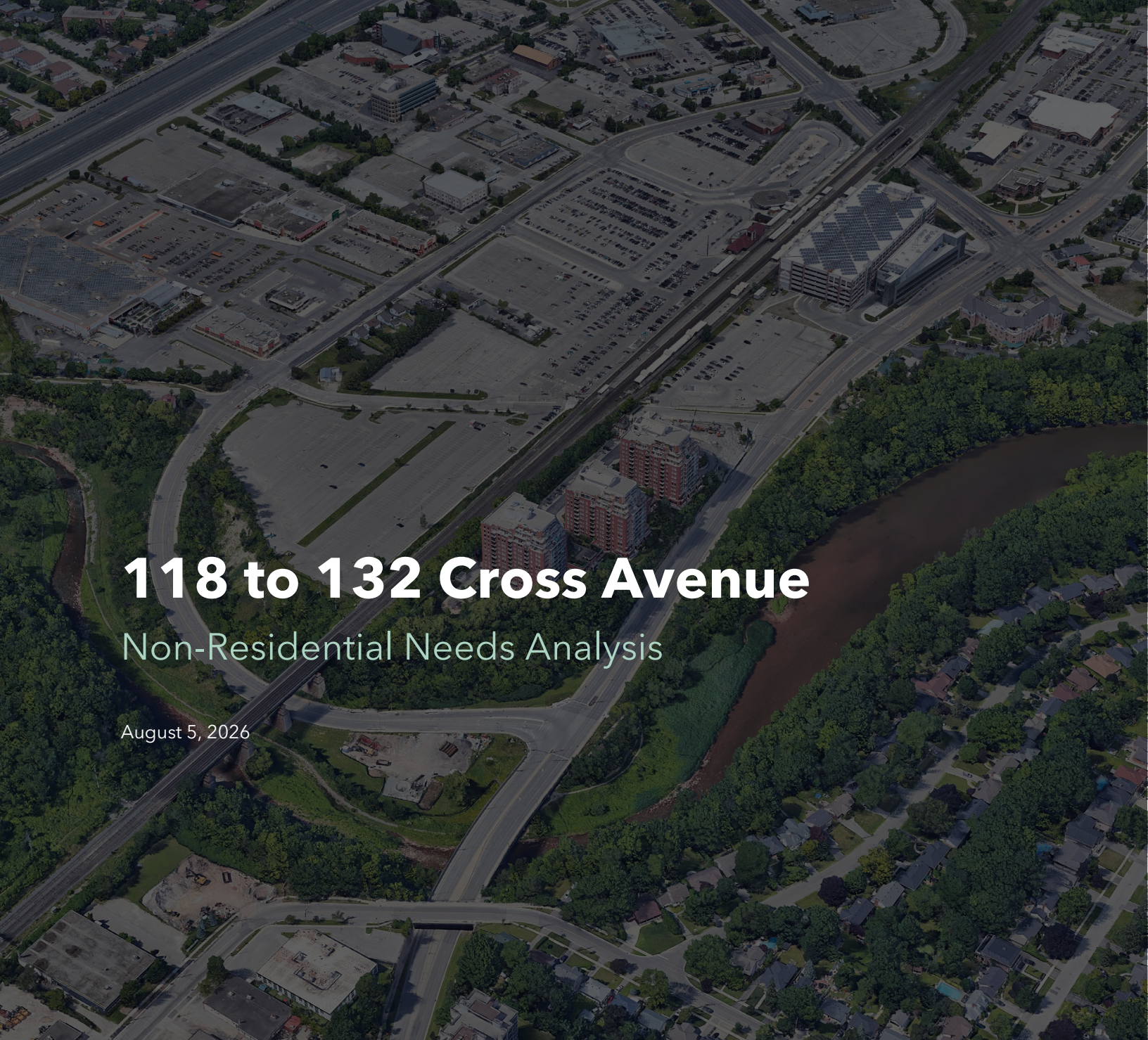


An aerial photograph of an urban area. A river flows through the lower right portion of the image. Several multi-lane roads intersect, including a major highway running diagonally from the top left. Various commercial and industrial buildings, parking lots, and some residential structures are visible. The text is overlaid on the left side of the image.

118 to 132 Cross Avenue

Non-Residential Needs Analysis

August 5, 2026

Parcel

PREPARED FOR:

Batory Planning + Management

PREPARED BY:

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August 5, 2026

2026-0018

This document is available in alternative formats upon request.

Cover Image: Google Earth



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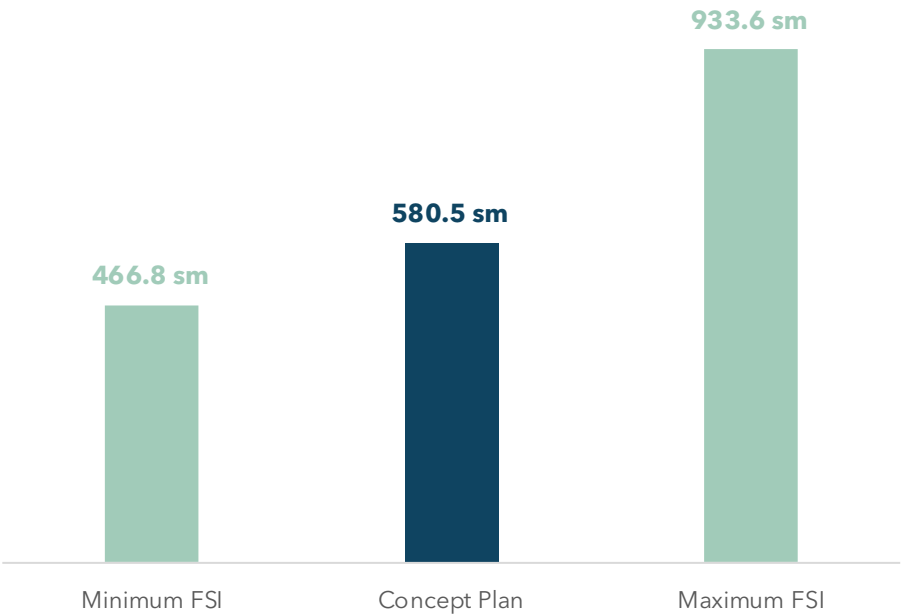
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Executive Summary

Parcel Economics Inc. ("Parcel") has been retained by Batory Planning + Management on behalf of their client (the "landowner"), who own lands located at 118 to 132 Cross Avenue, in the Town of Oakville, hereafter referred to as the "Subject Site".

The landowner has prepared a concept plan for the Subject Site that proposes a 38-storey mixed use building. The building is proposed to contain 429 residential units and 580.5 square metres of non-residential space at grade and on the second level. In total, the non-residential space comprises less than 2% of gross floor area ("GFA") in the proposed development. While the non-residential GFA is less than 12% of total GFA identified in Council adopted Official Plan Amendment Number 7 ("OPA 70"), it exceeds the amount of non-residential GFA that could be accommodated on the Subject Site based on the minimum FSI identified in Schedule L2 Midtown Oakville Minimum Density of OPA 70, as shown below.

Non-Residential GFA Potential on the Subject Site



Source: Parcel.

As the amount of non-residential space proposed within the current concept plan is less than the 12% identified in Policy 20.4.2.(a)(ii) of OPA 70, Parcel has prepared a Non-Residential Needs Analysis to demonstrate how the minimum equivalent job creation objectives and policies of the Livable Oakville OP will be achieved within the proposed development plan.

Based on an analysis completed by Parcel, the concept plan has the potential to accommodate 62 jobs once fully developed. This is more than 3-times the number of jobs that could be accommodated in the minimum FSI scenario and a bit less than twice the number of jobs that could be accommodated in the maximum FSI scenario in Council adopted OPA 70, as shown in the table below. **This analysis demonstrates how the minimum equivalent job creation objectives will be achieved within the proposed development plan, as the concept plan will accommodate more jobs than anticipated in OPA 70.**

Estimated Subject Site Employment Potential

		Minimum	Maximum
	Concept Plan	2.0 FSI	4.0 FSI
WFH Jobs	46 jobs	5 jobs	11 jobs
Commercial Jobs	16 jobs	13 jobs	25 jobs
Total Jobs	62 jobs	18 jobs	36 jobs

Source: Parcel.

To accommodate 12% of GFA as non-residential uses would require non-residential uses above the ground floor. Based on our extensive experience as retail market consultants, accommodating retail / service commercial above the ground floor is not viable from a market perspective in this location and also not consistent with the policy direction in OPA 70, which encourages non-residential space on the ground floor of buildings.

Further, major office space on the Subject Site is not viable from a market and financial perspective. Office construction in Oakville has declined significantly since the start of the pandemic and lease rates are currently not high enough to support the construction of new space. As it relates to the Subject Site, the inability to provide surface parking will make office GFA even more challenging, as parking will need to be provided underground, which comes at a significantly higher cost.

Based on the above analysis, it is our opinion that the amount of non-residential GFA proposed in the concept plan for the Subject Site satisfies the requirements of the Non-Residential Needs Analysis as it exceeds the minimum equivalent job creation, while also achieving the complete community objectives and policies of the Livable Oakville OP.

1.0

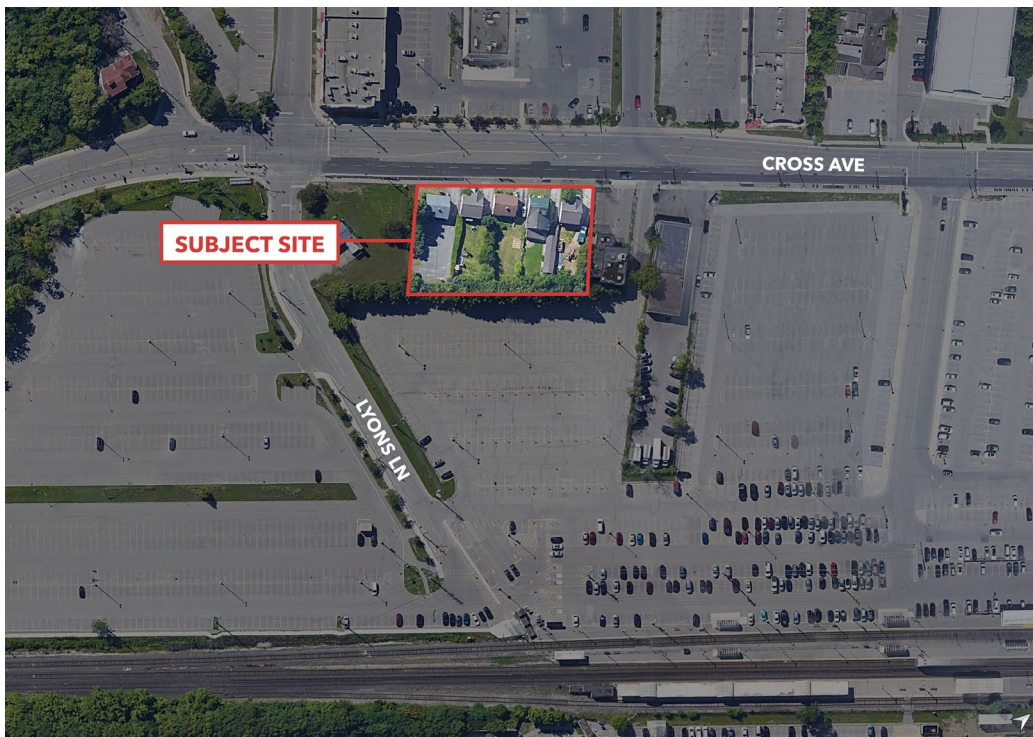
Introduction

Parcel Economics Inc. ("Parcel") has been retained by Batory Planning + Management on behalf of their client (the "landowner"), who own lands located at 118 to 132 Cross Avenue, in the Town of Oakville, hereafter referred to as the "Subject Site".

1.1 Background and Proposed Concept Plan

The location of the Subject Site is shown in Figure 1.1. As shown, the Subject Site is comprised of five residential properties with a total site area of 0.25 hectares. After adjusting for the future widening of Cross Avenue, the total developable site area is 0.19 hectares. There is currently one non-residential use on the Subject Site, which is a medical office use of approximately 73 square metres located in 118 Cross Avenue.

Figure 1.1
Subject Site Location

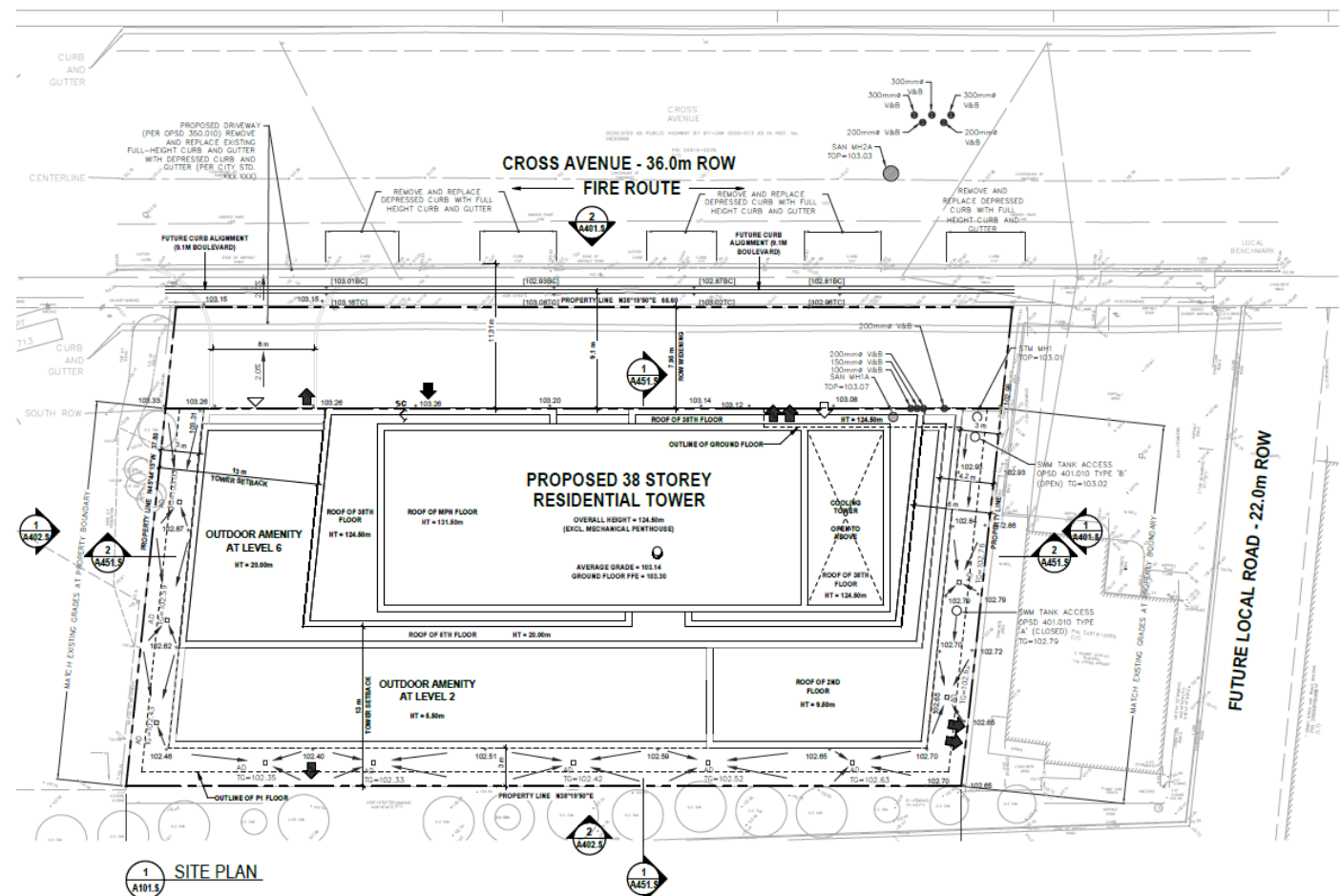


Basemap: Google Satellite.
Source: Parcel.

In terms of surrounding uses, the Subject Site is directly adjacent to the Oakville GO Station and associated parking to the south, east and west, while a range of retail / service commercial uses are located directly to the north. This results in the Subject Site benefiting from both transit connectivity and convenient access to commercial amenities.

Based on these attributes, the landowner has prepared a concept plan for the Subject Site that proposes a 38-storey mixed use building. The building is proposed to contain 429 residential units and 580.5 square metres of non-residential space at grade and on the second level. The concept plan for the Subject Site, shown in Figure 1.2, includes a total of 31,981 square metres of floor space. Therefore, the non-residential space proposed within the concept plan represents less than 2% of gross floor area ("GFA").

Figure 1.2
Concept Plan for the Subject Site



Source: Site Plan prepared by BDP Quadrangle (July 27, 2026).

1.2 Land Use Framework

The Subject Site is designated as Growth Area in Schedule G South East Land Use of the *Livable Oakville Official Plan*, January 15, 2025 Office Consolidation ("Livable Oakville OP"). As it relates to lands designated as Growth Area, the Council adopted *Official Plan Amendment Number 70* ("OPA 70") addresses land uses within this area, referred to as the Midtown Oakville area.

Within OPA 70, the Subject Site is further designated as Urban Core in Schedule L1 Midtown Oakville. As it relates to non-residential uses within Midtown Oakville, Section 20.4.1 of OPA 70 addresses non-residential uses where it states:

d) *Non-residential uses*

- i. *A mix of commercial uses, including large and small-scale retail, service and community-serving uses, is encouraged within the Urban Core, Community Commercial, and Office Employment land use designated areas and should be located at-grade and designed to complement pedestrian-oriented access and street character.*
- ii. *New major retail, such as grocery stores, are permitted where they are integrated with development. Such uses should be located in the podium or base of mixed-use buildings with pedestrian access from the public realm.*
- iii. *Redevelopment on sites with existing non-residential uses shall provide for the replacement of all existing non-residential gross leasable floor area.*
- iv. *The replacement of all existing non-residential gross leasable floor area may be modified on a case-by-case basis, without an amendment to this Plan, provided a Non-Residential Needs Analysis demonstrates that an alternative amount of non-residential use within the relevant Precinct can support the long-term employment objectives of this Plan.*

As the Subject Site currently includes 73 square metres of medical office space, this amount of non-residential GFA will need to be replaced. As it relates to a Non-Residential Needs Analysis, it is defined in Section 29.5 of OPA 70 as:

Non-residential Needs Analysis means a study prepared in support of a development application that proposes to not meet the minimum requirements for non-residential gross leasable floor area. This

study shall demonstrate how the minimum equivalent job creation and complete community objectives and policies of the Official Plan will be achieved within the proposed development plan.

As it relates to policies of the Urban Core lands, Section 20.4.2 of OPA 70 goes on to state:

20.4.2 Designation Specific

a) Urban Core

In addition to permitted uses provided in Part D Sub-Section 12.5.1 of this Plan, lands designated Urban Core are subject to the following policies which are provided to ensure that employment objectives and targets, along with the transit supportive, walkable community, and social cohesion goals of this Plan are met:

- i. New development shall provide a minimum of 12 percent of the total proposed gross floor area as non-residential uses, such as cultural, community, retail, commercial, and/or office, integrated within a mixed-use building or as a standalone building.*
- ii. The minimum non-residential requirement may be modified on a case-by case basis, without an amendment to this Plan, provided a Non-Residential Needs Analysis demonstrates that an alternative amount of non-residential use within the applicable Precinct can support the long-term employment objectives of this Plan;*

It is notable that OPA 70 does not provide a basis for the requirement that 12% of new GFA accommodate non-residential uses. To put this in context, based on the proposed concept plan for the Subject Site, 12% of GFA is equivalent to 3,838 square metres of space. To accommodate this amount of non-residential space, it would require that the first three storeys of the proposed building accommodate non-residential uses. This would be inconsistent with Section 20.4.1 d) i. of OPA 70, which encourages non-residential uses to be accommodated at-grade within mixed-use buildings.

Further, based on our extensive experience as retail market consultants, it is our professional opinion that retail / service commercial uses above the ground floor would not be viable at this location. While there could be potential for limited office space at the Subject Site, based on the size of the Subject Site, market conditions and parking requirements, as will be discussed later in this Non-Residential Needs Analysis, accommodating 3,838 square metres of major office space is not viable.

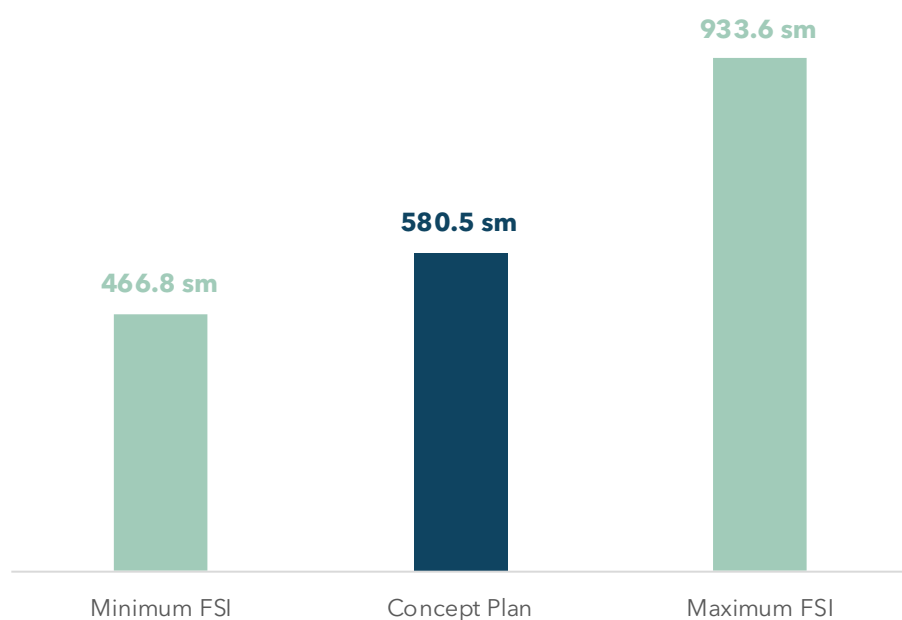
As it relates to the Precincts identified in Policy 20.4.2. a) ii., the Subject Site is located in the Lyons Precinct, as identified in Figure E1 Precinct Areas of OPA 70.

OPA 70 also identifies minimum and maximum densities for lands located within Midtown Oakville. As it relates to development on the Subject Site, Schedule L2 Midtown Oakville Minimum Density identifies a minimum floor space index ("FSI") for the site as being 2.0, while Schedule L3 Midtown Oakville Maximum Density identifies a maximum 4.0 FSI for the Subject Site.

Based on the area of the Subject Site, which is 0.19 hectares (net of the road widening), this results in a minimum of 3,890 square metres of GFA and a maximum of 7,780 square metres of GFA based on the policies in OPA 70. Further, Policy 20.4.2a) i) results in between 467 and 934 square metres of non-residential space, based on the minimum requirement for 12% of GFA to be non-residential uses. Therefore, as shown in Figure 1.3, the 580.5 square metres of non-residential space proposed on the Subject Site exceeds the amount of space that could be accommodated based on the minimum FSI identified for the site in OPA 70.

Figure 1.3

Non-Residential GFA Potential on the Subject Site



Source: Parcel.

1.3 Purpose

As the amount of non-residential space proposed within the current concept plan is less than the 12% identified in Policy 20.4.2.(a)(ii), Parcel has prepared a Non-Residential Needs Analysis to demonstrate how the minimum equivalent job creation objectives and policies of the Livable Oakville OP will be achieved within the proposed development plan.

2.0

Non-Residential Space Needs

2.1 Forecast Demand for Non-Residential Space

In November 2024, Watson & Associates Economists Ltd. ("Watson") released the *Growth Analysis Study, Town of Oakville, Final Report* (the "Growth Analysis Study"). The purpose of the Growth Analysis Study was, in part, to provide an updated long-term assessment of population, housing and employment growth potential in Oakville to 2051. It also included growth allocations to Midtown Oakville to support OPA 70.

The Growth Analysis Study assumes that Oakville's population will increase to 388,000 residents by 2051, or growth of 165,900 persons over the period between 2021 and 2051. As it relates to Midtown Oakville, the Growth Analysis Study allocates 11% of population growth to the area, as well as 8,900 residential units that are largely in form of high-density units.

As it relates to employment growth, which is the focus of our Non-Residential Needs Analysis, the Growth Analysis Study forecasts an additional 73,700 jobs in Oakville between 2024 and 2051, of which 5,960 jobs are allocated to Midtown Oakville. This is equivalent to 8% of employment growth in Oakville between 2024 and 2051.

The Growth Analysis Study provides a breakdown of these employment growth forecasts by employment type in Midtown Oakville. As shown in Figure 2.1, Major Office Employment ("MOE") is expected to grow by 1,000 jobs, while Population-Related Employment ("PRE") is expected to grow by 4,960 jobs.

Figure 2.1

Midtown Oakville Employment Growth, 2024 to 2051

	Midtown Oakville	Town of Oakville	% Share of Town of Oakville
Major Office Employment ¹	1,000	16,200	6%
Population-Related Employment	4,960	40,030	12%
Employment Land Employment	0	17,470	0%
Rural Employment	0	0	0%
Total Employment	5,960	73,700	8%

¹ Jobs located in free-standing office buildings of 1,960 square metres (20,000 square feet) or more or in the office portion of a mixed-use office and residential building. Based on Integrated Growth Management Strategy Regional Urban Structure Discussion Paper, June 2020, Regional Official Plan Review.

Source: Parcel, based on Growth Analysis Study, Town of Oakville, Final Report, November 2024, Watson.

It is important to note that a portion of these PRE jobs include work from home (“WFH”) and no fixed place of work (“NFPOW”) employment. In the Growth Analysis Study, Watson identifies that the relative share of WFH employment is anticipated to increase over the long-term due to advances in technology and telecommunications, as well as demographic and socio-economics. In total, Watson anticipates that 27% of total employment growth will be “related to home occupations, home-based businesses, and off-site employment” (page 52), which includes WFH and NFPOW employment that does not require non-residential GFA to accommodate growth.

As it relates to the PRE job growth, Figure 2.1 anticipates that Midtown Oakville will account for 12% of PRE job growth in the Town between 2024 and 2051. It is unclear if this 12% share informed Policy 20.4.2.(a)(ii) in OPA 70, which requires that 12% of GFA accommodate non-residential uses.

While the Growth Analysis Study provides employment growth forecasts for Midtown Oakville, it does not translate these forecasts into a need for non-residential space to accommodate these jobs. Therefore, Parcel has utilized reasonable employment densities to determine the need for non-residential space to accommodate these forecasts.

As a portion of PRE jobs would include WFH employment that does not require non-residential GFA, we have excluded these jobs from the calculated need for space. Based on WFH activity rates identified in Figure F-2 of the Growth Analysis Study and population allocated to Midtown Oakville in Figure H-1 of the Growth Analysis Study, we have estimated 1,260 additional WFH jobs in Midtown Oakville between 2024 and 2051. Further, based on our review of the Growth Analysis Study, it is estimated that approximately 6% of PRE jobs are associated with NFPOW employment. In Midtown Oakville, this is equivalent to approximately 300 NFPOW jobs that also do not require non-residential GFA to accommodate growth. Therefore, only 3,400 PRE jobs will require non-residential GFA to accommodate growth.

To calculate the required amount of GFA to accommodate PRE jobs, we have relied on a density of 37 square metres per employee (400 square feet per employee), which is contained in the *Development Charges Background Study, Town of Oakville*, May 13, 2022, as prepared by Watson (the “Oakville DC Study”). For MOE jobs, we have relied on a density of 20 square metres per employee, which is based on the definition of major office in the Livable Oakville OP. As shown in Figure 2.2, to accommodate the 3,400 PRE jobs (excluding WFH and NFPOW jobs) in Midtown Oakville there is a need for 125,800 square metres of commercial space, in addition to 20,000 square metres of major office space.

Figure 2.2

Midtown Oakville Non-Residential Space Needs

	Major Office Employment	Population-Related Employment	Total
2024-2051 Employment Growth	1,000	4,960	5,960
Less: Work From Home Jobs	0	1,260	1,260
Less: No Fixed Place of Work Jobs	0	300	300
Net Employment Growth Requiring GFA	1,000	3,400	4,400
Employment Density			
Square Metres Per Employee	20 sm per job	37 sm per job	
Non-Residential Space Needs (sq.m.)	20,000 sq.m.	125,800 sq.m.	145,800 sq.m.

Source: Parcel, based on Growth Analysis Study, Town of Oakville, Final Report, November 2024, Watson.

2.2 Existing Non-Residential Space

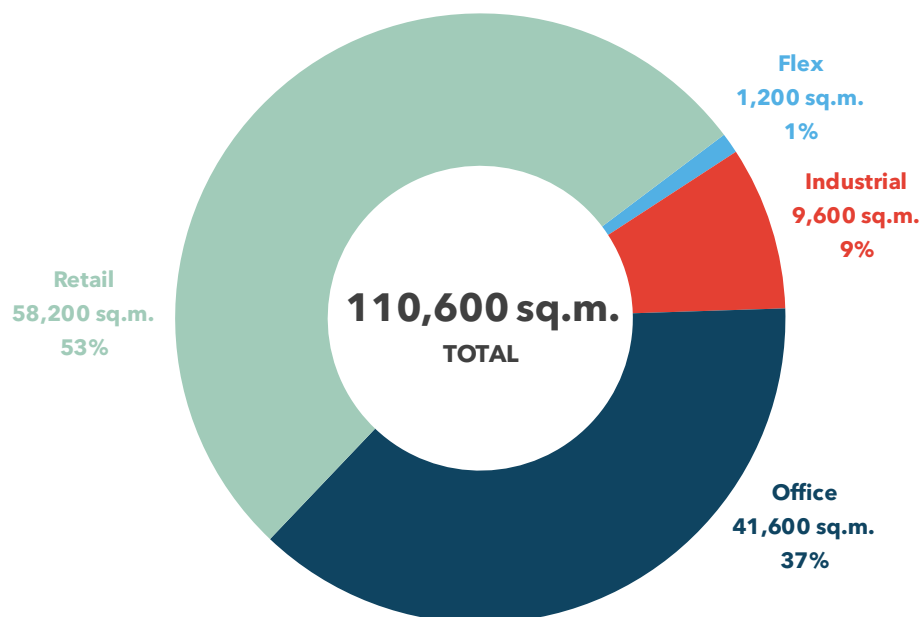
Based on data from CoStar, Midtown Oakville has approximately 110,600 square metres of non-residential space¹. Figure 2.3 provides a breakdown of this space. As shown, retail / service commercial represents 53% of GFA, while office represents 37% of GFA. Less than 10% of the non-residential space is used for industrial purposes. Figure 6-7 in the Growth Analysis Study estimates that there were approximately 5,500 jobs located in Midtown Oakville in 2024. The approximately 110,600 square metres of non-residential space currently located in Midtown Oakville are estimated to accommodate 3,750 of these jobs based on employment densities in the Oakville DC Study, with the remaining jobs likely comprised of WFH and NFPOW employment.

Within the Lyons Precinct, which includes the Subject Site, there is currently 14,392 square metres of non-residential GFA, largely associated with the Home Depot and the office building located at 627 Lyons Lane. Based on employment densities from the Oakville DC Study, there are estimated to be approximately 470 jobs in the Lyons Precinct accommodated within the non-residential GFA, or about 12.5% of employment accommodated in Midtown Oakville.

¹ Non-residential space includes flex, industrial, office, and retail asset types.

Figure 2.3

Existing Non-Residential Space in Midtown Oakville



Note: Existing inventory as of April 2026. Rounded to nearest hundredth.

Source: Parcel, based on CoStar Realty data.

2.3 Proposed Non-Residential Inventory

Proposed Non-Residential Inventory

In addition to this existing non-residential space, there is approximately 27,300 square metres of non-residential space proposed in Midtown Oakville. Retail / service commercial represents approximately 17,100 square metres (60%) of space, while office represents 6,300 square metres (23%) of space (Figure 2.4). An additional 4,500 square metres of commercial space is planned to be used as a fitness centre and co-working facility. This non-residential space is entirely proposed as part of seven mixed-use developments in Midtown Oakville, including the Subject Site. Four of these applications (highlighted grey) combine to form a Transit-Oriented Community (TOC) north of Oakville GO Station.

The current development pipeline in Midtown Oakville—if fully developed—would accommodate nearly 20% of the area's non-residential space needs to 2051, based on the space needs identified in Figure 2.2. The proposed office space represents nearly one-third of the space needed to 2051, while the proposed retail / service commercial

space represents as much as 17% of space needs to 2051. It is notable that aside from the Subject Site, none of the applications for non-residential space are located in the Lyons Precinct.

Figure 2.4

Proposed Non-Residential Space in Midtown Oakville

Proposed Space Breakdown				
Development Address	Office	Retail	Other Commercial	Non-Residential
118 to 132 Cross Avenue		581 sq.m.		581 sq.m.
157 and 165 Cross Avenue	1,000 sq.m.	2,700 sq.m.	-	3,700 sq.m.
166 South Service Road East	-	1,300 sq.m.	4,500 sq.m.	5,900 sq.m.
217 to 227 Cross Avenue & 571 to 595 Argus Road	2,700 sq.m.	1,600 sq.m.	-	4,300 sq.m.
349 Davis Road	1,500 sq.m.	800 sq.m.	-	2,200 sq.m.
420 South Service Road East	-	9,100 sq.m.	-	9,100 sq.m.
590 Argus Road	1,100 sq.m.	1,000 sq.m.	-	2,100 sq.m.
Total	6,300 sq.m.	17,081 sq.m.	4,500 sq.m.	27,881 sq.m.

Note: Highlighted applications are part of a TOC. Values rounded to nearest hundredth.

Source: Parcel, based on Town of Oakville Active Development Applications portal.

2.4 Non-Residential Space Potential

Based on Section 20.4.2. a) ii. we have also considered the potential amount of non-residential GFA that could be accommodated within the Lyons Precinct to support the long-term employment objectives of the Livable Oakville OP.

The minimum densities included in Schedule L2 of OPA 70 would result in the ability to accommodate 210,725 square metres of GFA in the Lyons Precinct. Based on the policy to accommodate 12% of GFA as non-residential space, this would result in the Lyons Precinct accommodating 25,290 square metres of non-residential GFA. As noted previously, there are currently 14,392 square metres of non-residential GFA currently within the Lyons Precinct. Therefore, the Lyons Precinct could accommodate an additional 10,898 square metres of GFA based on the minimum densities identified in OPA 70. This represents approximately 7.5% of the non-residential space need in Midtown Oakville to accommodate employment growth to 2051. The 580.5 square metres of non-residential

GFA proposed on the Subject Site would contribute towards the additional space needed in the Lyons Precinct to accommodate employment growth.

3.0

Office Market Feasibility

As major office uses are permitted within the Urban Core designation, we have considered existing office market metrics in the Town of Oakville and the viability of major office uses on the Subject Site.

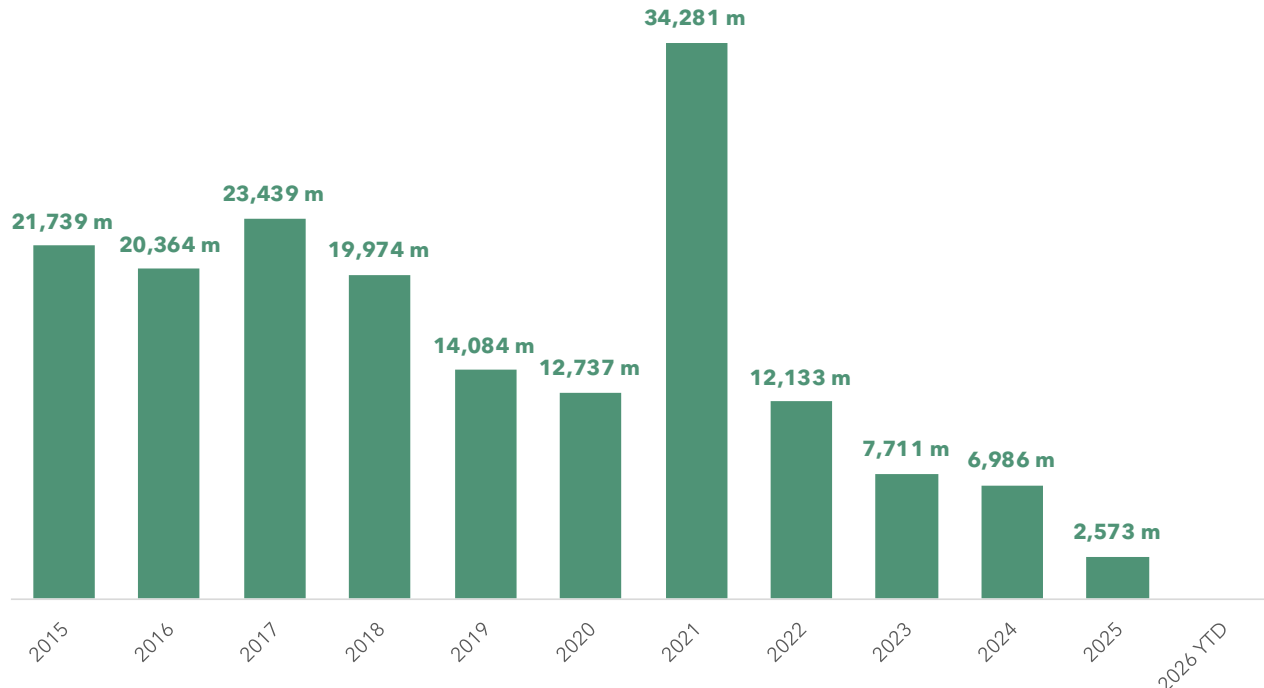
Office Market Metrics

Office Supply

As shown in Figure 3.1, between 2015 and 2022, the Town of Oakville added approximately 19,800 square metres of new office space per year. However, since that time new office space construction in the Town has declined significantly, to approximately 5,700 square metres per year, or a 70% reduction in the construction of new office space. The decline in office space construction in recent years is due, in part, to the COVID-19 pandemic, which has impacted demand for office space by providing the opportunity to work from home. Furthermore, while Figure 3.1 shows significant delivery of office space in 2021, this new space was started prior to the pandemic.

Figure 3.1

Oakville New Office Construction



Source: Parcel, based on CoStar Realty data.

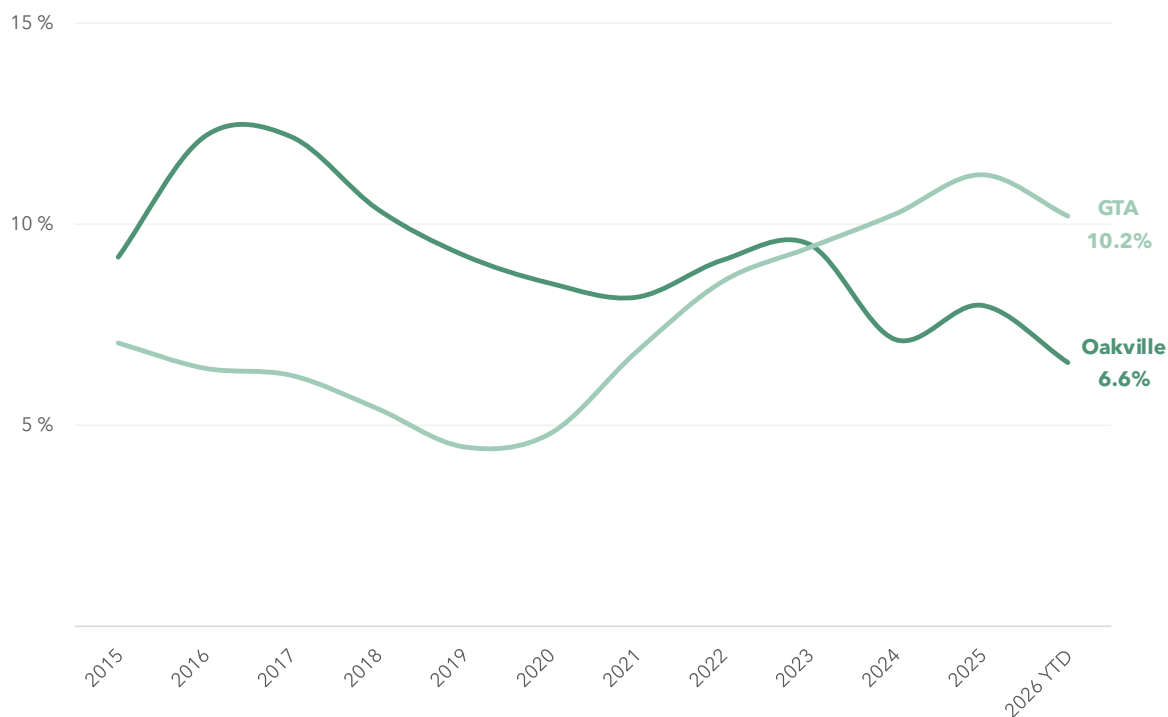
Office Vacancy Rate

Figure 3.2 shows the vacancy rate for existing office uses across Oakville in comparison to the Greater Toronto Area ("GTA"). As shown, the office vacancy rate in Oakville has been declining since the height of the pandemic and currently stands at nearly 7%. This vacancy rate is characteristic of a balanced office market. This vacancy rate is also lower than the GTA-wide average of 10.2%.

While a relatively low vacancy in Oakville is an indicator of office demand in the area, vacancy across other office buildings in the GTA represent direct competition to existing and / or new office space in Oakville, including Midtown Oakville. This is heightened due to the fact that many vacant office spaces in the GTA are located in locations closer to Toronto and / or along subway lines. These opportunities will limit demand for new office space in Midtown Oakville.

Figure 3.2

Average Office Vacancy Rates



Source: Parcel, based on CoStar Realty data.

Net Lease Rates

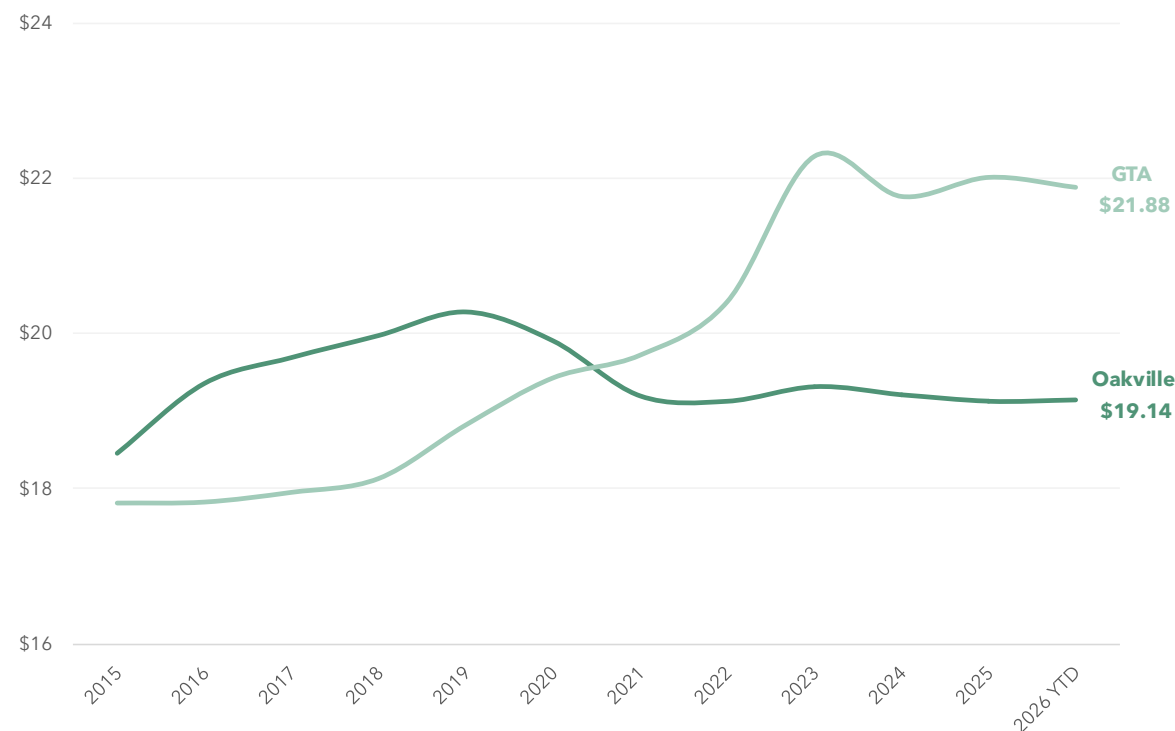
Further, the net lease rates for office spaces in Oakville have been relatively stable since the pandemic despite relatively low vacancy rates. Estimated at \$19 per square foot (PSF), existing net lease rates for office space in Oakville are slightly below net lease rates for office space across the GTA, as detailed in Figure 3.3. As shown, current office lease rates in Oakville are also below rates experienced prior to the pandemic.

Lower lease rates in Oakville are likely tied with the heightened availability of office space across other markets in the GTA. Landlords are likely unable to increase the lease rates they are charging given the absence of sufficient demand to absorb vacant space and proximity to other opportunities at more optimal locations in the area.

Low lease rates also limit the likelihood that new office space will be developed in Oakville. Rising costs—including construction costs, interest rates, development charges and property tax increases—are limiting the viability of building office space and non-residential space more generally. Developers require high lease rates as a means to make these developments feasible. Net lease rates in Oakville are not enough to support new office development, indicating that it will not be possible to provide office space on the Subject Site.

Figure 3.3

Average Office Lease Rates (per SF)



Source: Parcel, based on CoStar Realty data.

Parking Requirements

In addition to market factors that could impact the ability to accommodate major office uses on the Subject Site, the viability of space will also be impacted by the need to provide parking for office users. Based on the Town's zoning by-law, there is a requirement for 1 parking space per 35 square metres of net floor area². If 12% of the development's total proposed GFA is assumed to be non-residential and is used entirely for office purposes, then a minimum of 110 parking spaces will be required for approximately 3,800 square metres of office space (Figure 3.4).

The current concept plan for the Subject Site includes 84 underground parking spaces across three levels of underground parking. Increasing the number of underground parking spaces on site to accommodate the required number of parking space to support office development is not viable at the Subject Site due to the high cost to construct underground parking.

Therefore, the only locations where office space is likely to be viable based on the required parking, is at locations where surface parking can be provided rather than more expensive underground parking. This is consistent with office space currently provided across Midtown Oakville.

Figure 3.4

Minimum Office Parking Requirements

	Ratio	GFA
Proposed Space		
Total Space		31,981 sq.m.
Non-Residential Space Ratio	12%	
Assumed Non-Residential Space		3,838 sq.m.
Parking Potential		Parking Spaces
Business Office Parking Ratio	1.0 per 35 sq.m	
Minimum Parking Requirement		110

Source: Parcel, based on Town of Oakville's Zoning By-law 2014-014 and development's proposed concept (as of July 27, 2026).

² This is the parking ratio for Business Office uses permitted under the Subject Site's current zoning of 'Midtown Transitional Commercial'.

4.0

Subject Site Characteristics & Employment Potential

4.1 Site and Access

Midtown Oakville has a large concentration of retail and office space. Much of the office space is concentrated along the Trafalgar Road corridor within the Trafalgar Precinct while retail space extends beyond. The Subject Site is to the western portion of Midtown Oakville and is situated in a primarily retail area adjacent to a large suburban plaza and standalone retail shops.

North of the Subject Site across Cross Avenue is Trafalgar Village, a commercial retail plaza consisting of retailers such as Home Depot, Value Village, Dollarama, and United Supermarket among others. To the east of this plaza are other commercial properties and a hotel that are slated for redevelopment as part of a TOC. Directly east of the Subject Site is an auto repair shop and an accountant's office while to the west is a hydro substation. Oakville GO Station and its north parking lot encompass the Subject Site to the south.

The GO Station offers direct connections between Downtown Toronto and Downtown Hamilton (and beyond) along the Lakeshore West train route while providing bus connections to other parts of Oakville and the GTA. VIA train service is also available at this station.

The Subject Site benefits from visibility due to its proximity to Oakville GO and Cross Avenue, which serves primarily as a local throughfare between Trafalgar Road (a major arterial) and Cornwall Road (a multi-purpose arterial). The Subject Site also benefits from quick access to Highway 403 via the Trafalgar Road interchange, which is less than one-kilometre away.

In respect to future non-residential redevelopment on the Site, there is little to no market for office space as this use is focused along the highly accessible and visible Trafalgar Road corridor. The Subject Site is also small for redevelopment as a major office use. Retail space is more favourable in this part of Midtown Oakville but should be limited to ground floor retail.

Figure 4.1
Subject Site Location & Surrounding Context



Basemap: Google Satellite.
Source: Parcel.

4.2 Subject Site Employment Potential

We have calculated the amount of employment that could potentially be accommodated on the Subject Site based on the minimum (2.0 FSI) and maximum (4.0 FSI) densities contained in OPA 70, in comparison to the employment that could be accommodated in the proposed concept plan for the Subject Site. These employment estimates are

comprised of WFH jobs that could be accommodated in residential units, as well as employment that could be accommodated in non-residential GFA.

The amount of GFA that could be accommodated on the Subject Site is summarized in Figure 4.2. As shown, the concept plan for the Subject Site proposes approximately 31,981 square metres of GFA. This is compared to 3,890 square metres based on the minimum FSI and 7,780 square metres under the maximum FSI identified in OPA 70.

Figure 4.2

Gross Floor Area on the Subject Site

Gross Floor Area	Concept Plan	Minimum	Maximum
		2.0 FSI	4.0 FSI
Residential	31,400 sm	3,423 sm	6,846 sm
Non-Residential	581 sm	467 sm	934 sm
Total	31,981 sm	3,890 sm	7,780 sm

Source: Parcel.

Work From Home

In determining the number of WFH jobs that could be accommodated on the Subject Site under the various scenarios, we have estimated unit potential. Based on the concept plan for the Subject Site, there are 429 units proposed. To estimate the number of units that could be accommodated on the Subject Site under the minimum and maximum densities, we have assumed a gross unit size of 73 square metres per unit³ and a unit mix that is consistent with that proposed in the concept plan for the Subject Site.

As shown in Figure 4.3, the 429 units proposed in the concept plan is in comparison to only 47 units in the minimum FSI scenario and 94 units in the maximum FSI scenario. As summarized in the Growth Analysis Study, WFH employment is anticipated to account for nearly 16% of employment growth in Oakville and will therefore be an important component of employment growth in the Town.

To estimate WFH jobs, we have relied on person per unit ("PPU") rates from the Oakville DC Study and 7% of the population working from home by 2051, which is consistent with the activity rate assumed in the Growth Analysis Study. Based on this analysis, the Subject Site could accommodate 46 WFH jobs based on the units proposed in the

³ Gross unit size includes areas for circulation and residential amenities. The gross unit size is consistent with the average proposed in the concept plan for the Subject Site.

concept plan. This compares to 5 WFH jobs in the minimum FSI scenario and 11 WFH jobs in the maximum FSI scenario.

Figure 4.3

Work From Home Employment Potential

Residential Units	Concept Plan	Minimum 2.0 FSI	Maximum 4.0 FSI
One-Bedroom or Less	282	31	62
Two-Bedrooms or More	147	16	32
Total	429	47	94
Total Population	660	70	150
WFH Activity Rate		7.0%	
WFH Jobs	46 jobs	5 jobs	11 jobs

Source: Parcel.

Non-Residential GFA

In addition to WFH jobs accommodated within residential units, there is also an opportunity to accommodate jobs within the non-residential GFA. As summarized in Figure 4.4, the non-residential GFA accommodated on the Subject Site in the proposed concept plan exceeds the GFA that could be accommodated in the minimum FSI scenario.

Figure 4.4

Non-Residential Space Job Estimate

	Concept Plan	Minimum 2.0 FSI	Maximum 4.0 FSI
Non-Residential GFA	581 sm	467 sm	934 sm
Job Density	37.2 sm per employee		
Jobs	16 jobs	13 jobs	25 jobs

Source: Parcel.

Based on an employment density of 37.2 jobs per square metre (400 jobs per square foot), the Subject Site could accommodate 16 commercial jobs based on the space proposed in the concept plan. By comparison, the Subject Site could accommodate 13 commercial jobs in the minimum FSI scenario and 25 commercial jobs in the maximum FSI scenario.

Comparison of Employment Potential

Based on the above analysis, Figure 4.5 compares the employment potential of the Subject Site based on the concept plan to the job potential in the minimum and maximum FSI scenarios. As shown, the concept plan has the potential to accommodate 62 jobs once fully developed. This is more than 3-times the number of jobs that could be accommodated in the minimum FSI scenario and a bit less than twice the number of jobs that could be accommodated in the maximum FSI scenario. This analysis demonstrates how the minimum equivalent job creation objectives will be achieved within the proposed development plan.

Figure 4.5

Estimated Subject Site Employment Potential

	Concept Plan	Minimum 2.0 FSI	Maximum 4.0 FSI
WFH Jobs	46 jobs	5 jobs	11 jobs
Commercial Jobs	16 jobs	13 jobs	25 jobs
Total Jobs	62 jobs	18 jobs	36 jobs

Source: Parcel.

5.0

Summary and Conclusions

The Non-Residential Needs Analysis has been prepared to address Policy 20.4.2.a) i) of OPA 70, as the current concept plan for the Subject Site does not provide a minimum of 12% of GFA as non-residential uses. Where a Non-Residential Needs Analysis is defined as:

Non-residential Needs Analysis means a study prepared in support of a development application that proposes to not meet the minimum requirements for non-residential gross leasable floor area. This study shall demonstrate how the minimum equivalent job creation and complete community objectives and policies of the Official Plan will be achieved within the proposed development plan.

As noted in the requirement for a Non-Residential Needs Analysis, the study shall demonstrate how the minimum equivalent number of jobs based on policies in the Livable Oakville OP will be achieved. As demonstrated in our report, while the concept plan only proposes that 1.8% of the GFA accommodates non-residential uses, based on the increased density proposed on the Subject Site, **the concept plan would accommodate more jobs than could be accommodated based on the minimum and maximum densities proposed in OPA 70**, which is not yet in force and effect. Therefore, the proposed concept plan for the Subject Site satisfies the requirements of the Non-Residential Needs Analysis.

Further, to achieve 12% of GFA as non-residential uses, it would require 3,838 square metres of non-residential GFA, or the first three storeys of the proposed building. In our extensive experience as retail market consultants, it is our professional opinion that retail / service commercial uses above the ground floor would not be viable at this location. Accommodating non-residential uses above the ground floor is also not consistent with OPA 70, which encourages non-residential uses on the ground floor of mixed use buildings. Therefore, accommodating 12% of GFA as non-residential uses would not achieve the complete community objectives of the Livable Oakville OP, as the non-residential space would remain vacant and come at the expense of additional housing.

Further, it is our professional opinion that there is not market potential to accommodate major office space at the Subject Site. Furthermore, major office space in Midtown Oakville should be concentrated in the existing office node located along Trafalgar Road.

Based on the above analysis, this Non-Residential Needs Analysis has demonstrated that the proposed concept plan for the Subject Site achieves minimum equivalent job creation and complete community objectives and policies of the Livable Oakville OP.



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