

D&L Crane Holdings Ltd.
P.O. Box 761
Charlottetown, PE
C1A 7L3

July 22, 2021

Allison MacEwan, Director Regulator Services
Island Regulatory & Appeals Commission
PO BOX 577
Charlottetown, PE
C1A 7L1

Dear Mr. MacEwen,

Please accept this letter as formal objection to an application for a new Retail Petroleum Outlet License submitted by Mel's Enterprises Inc. in Stratford, PE. I feel the application submitted for the new license was not accompanied by enough supporting information for IRAC to form a decision at this time on the proposed site.

The site proposed in the application forms two parcels of land in Stratford: PID 328039 & 882084, of which both parcels of land are owned by Concord Properties Ltd. and would require a significant approval and rezoning with the town of Stratford before development permits would be issued. The two properties also share one single entry point off Jubilee Rd. This single point of ingress and egress to the site would create significant traffic flow concerns on Jubilee Rd. given the proximity to the primary entrance to Stratford Quick-Stop & Tim Hortons. For safe and convenient ingress and egress of the proposed development outlined in the application, road extensions to Shakespeare Dr. and Jubilee Rd. as outlined in Appendix A1, Phase 6 of the application would expect to be approved with development permits and construction timelines.

The application also states there will be an additional entry point to the site off the proposed Shakespeare Dr. extension as outlined in A1 of the application appendix. The construction of these additional roads and entry points is important to the traffic flow of the area. As a business owner across the road from the proposed site, I would have expected to see a detailed traffic study prior to submission of the application. This study would be necessary to ensure traffic flow will maintain a safe and convenient access to both properties prior to an approval and construction of the Shakespeare Dr. and Jubilee Rd. extensions. I feel this significant development prior to the additional ingress and egress options will present traffic flow concerns in the area.

Annual fuel volume data outlined in the application is current up to 2019 numbers. I feel 2020 numbers are important as it outlines the effects seen on retail fuel sales due to the existing Pandemic. There is also an anticipated decline in hydrocarbon reliance as provincially and federally the government shifts focus to becoming carbon neutral. Provincial government stated on March 18, 2021 that a target for the PEI motoring public to be all Electric was 2030. Federally, the government announced that they intend to ban the sale of fuel-powered vehicles by 2035. These two provincial and federal targets will ultimately result in a decline of fuel sales if met. Although we see population growth locally and marginal increases in fuel sales provincially, the outlook for retail sales appears to face a decline.

In summary, though my business would potentially be affected if this application were approved, this intervention is not based upon competitive market forces. I have spent a significant amount of time

reviewing this matter and previous decisions. I am aware that the Commission's role is not to regulate the market but to consider the application in light of the motoring public and its need and convenience. Based upon the materials submitted by the applicant to date, and with all due respect, the overall development of this area, including the construction of a new retail outlet, amounts only to a concept. Granting approval, based largely on a concept, seems difficult when the materials are limited as they relate to the motoring public and its need and convenience. Issues such as road design, realignment, ingress and egress are all important to not only the motoring public at large, but the way in which my location and customers, including large delivery trucks, would be impacted from a safety perspective.

For the reasons as set out above, and in order to ensure that I receive any further information that might be filed in support of the application, I ask to be recognized as an intervener.

I have copied my lawyer, Ryan MacDonald, to this submission, and ask that any future communications pertaining to this matter be directed to him.

Regards,

A handwritten signature in cursive script, appearing to read "David Crane", with a long horizontal flourish extending to the right.

David Crane
President, D&L Crane Holdings Ltd.