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SENT VIA EMAIL

P – 2442

December 22, 2020

Planning and Building Services  
City of Barrie  
70 Collier Street  
Barrie, ON L4M 4T5

**Attention: Ms. Kathy Suggitt, RPP  
Manager of Strategic Initiatives, Policy and Analysis  
Development Services**

**Re: Draft City of Barrie Official Plan  
Salem Landowners Group Inc.  
City of Barrie**

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Dear Ms. Suggitt,

On behalf of the Salem Landowners Group Inc., KLM Planning Partners Inc. is pleased to provide you with comments related to the draft City of Barrie Official Plan 2020.

Firstly, we wish to thank you, Tomasz and Michelle for taking the time to meet with Ray Duhamel and myself on a number of occasions to work through our concerns on the draft Official Plan. As mentioned in those discussions, both landowner groups have characterized the issues under four headings for consistency:

- 1. General Observations**
- 2. Major Policy Concerns**
- 3. Detailed Policy Comments/Concerns**
- 4. Detailed Mapping Comments/Concerns**

Due to the detailed review undertaken of the draft Official Plan document, comments related to the Urban Design Guidelines will be provided under separate cover at a later date.

## **1. General Observations**

The Salem Secondary Plan was approved by the then Ontario Municipal Board in 2016. Since that time five residential draft plans of subdivision and one industrial draft plan of subdivision has been approved with one of them being registered and under construction.

All of the approved plans did not require an amendment to the Secondary Plan and given that development is still proceeding, the landowners feel it is important to keep the Secondary Plan largely intact.

As you know, an Official Plan is a guiding document that provides flexibility and interpretation with policies which generally direct how and where the City should grow. The draft Official Plan is completely opposite wherein it is very prescriptive and removes any flexibility inherent within the plan. The issue with such a prescriptive document is it will ultimately require private developments to amend the document regularly. In our view, when a document leads to regular amendments being filed, it is a sign the policies are not effective.

The document as currently drafted is very difficult and cumbersome to read and interpret. There are so many sections and sub sections that it is confusing. Furthermore, there is a substantial amount of urban design terminology used within the document, which are better suited to be included in the Urban Design Guidelines. Based on this, the Salem landowners are of the opinion the document should be simplified.

## **2. Major Policy Concerns**

Just to reiterate what has been noted above, wherein the Salem landowners wish to see the Salem Secondary Plan remain largely intact moving forward. Development applications have been approved, infrastructure is being planned/installed, all of which requires significant investment and as such, the existing Salem Secondary Plan should remain largely in place.

The draft Official Plan proposes to plan to the 2041-time horizon whereas the Growth Plan requires a 2051-time horizon. The Salem landowners are of the opinion the document should be planned to the required timeframe and which will bring the balance of the employment lands east of Highway 400 to Huronia Road into the settlement boundary.

A critical policy that is found within the Salem Secondary Plan but has been left out of the draft document is one that advises prospective developers whom are non-participating landowners that they must become a member in good standing with the group, prior to the submission of a development application. The Salem landowners respectfully request this policy remain.

The draft Official Plan seeks to achieve a minimum of 62 persons and jobs per hectare whereas the Growth Plan sets out a minimum of 50 persons and jobs per hectare and lastly the current Salem Secondary Plan sets out a minimum of 52 persons and jobs per hectare. The Salem Landowners wish to maintain this minimum moving forward.

The Neighbourhood Area designation and policies sets out a minimum of 50 and 60 units per hectare depending on the fronting situation of the development which is much too high. The current Salem Secondary Plan sets out the range of low density residential from 20 to 40 units per hectare, which is a reasonable range of density. The Salem Landowners wish to continue using this density range.

Section 3, Planning for an Attractive City, is very confusing and cumbersome. The Salem Landowners recommend this section be removed and instead be replaced with some basic urban design principles the City wishes to achieve while also referencing the new City-Wide Urban Design Guidelines as the guide for urban design objectives. This is consistent with Official Plans in most other municipalities.

Section 5.5, the Salem Landowners request the ecological offsetting policies be removed from the document. Any required offsetting will be undertaken by the LSRCA and as such, there is not a need for policies related to this in the Official Plan.

Section 2.6.7.2 which provides policies related to Greenspaces appears to preclude the ability to have Low Impact Development (LID) or other necessary infrastructure where it is required to service surrounding development. The Salem Landowners request this policy be amended to allow for infrastructure that services all of the surrounding developments, as noted in the Subwatershed Impact Study, Master Drainage Plans and Functional Servicing Reports, which are ultimately approved by the City and LSRCA/NVCA as applicable.

Section 3.5.b discourages back-to-back townhouses within Neighbourhood Areas. To preclude this housing form is a lost opportunity to provide another variant of housing at a more affordable price point. The Salem Landowners request that back-to-back townhouses be permitted in the Neighbourhood Area.

### 3. Detailed Policy Comments/Concerns

Policy	Summary	Comment/Request
1.2	This policy states a “Cultural richness amongst a backdrop of flourishing natural areas”	We are not sure what this actually means
1.3	This policy states “hard and soft infrastructure (e.g. stormwater management and affordable housing respectively) Also, “creating stronger synergies across the City”	What does this mean and what is the objective in which it is trying to achieve?
2.3	Allows for minor boundary adjustments without an amendment to the Plan.	Does this include settlement boundary adjustments?

2.3.2.h.ii	Requires at least 35% of housing units in the UGC to be affordable.	This target is much too high which will discourage growth from occurring in the UGC.
2.3.2.i.ii	Requires a pre-submission design process.	What is this and is it really needed? – policy should speak to a meeting with urban design staff prior to formal pre-consultation rather than a design process.
2.3.2.i.iii	Speak to winter city design elements?	What is this and this would be better served to be included in the urban design guidelines rather than the Official Plan.
2.3.2.j.i	Requires an Urban Growth Secondary Plan.	Why is this necessary? Should be amended to say “a detailed Secondary Plan may be developed”.
2.4.2.1.i	Sets out the housing mix requirements, along with “all new development shall be planned...”	The policy is very prescriptive and the Salem SP does not have the same housing mix. The mix in the existing Salem SP should continue
2.4.2.3.j	This policy speaks to including best practices including the use of district energy.	Is the City proposing a district energy plant? If not, why include this?
2.5.1.c	Only permits the subdivision of land for land uses permitted in that designation or that maintain the intent of the plan.	What happens if you have to apply for an OPA to permit the use?
2.5.1.i.v	Requires all new residential development and redevelopment in medium and high-density land use designations to provide 10% affordable housing units with a range of unit sizes.	Where is the rationale for this? If an affordable housing requirement is being sought, it should not be a goal to achieve 10% for each development. Perhaps it should state 10% across the entire City, which is more realistic.
2.5.4.b	How would an OPA or ZBLA have a negative effect of achieving the 50% intensification or DGA density targets?	Are you speaking to down designating or zoning?
2.6.1	Speaks to lands designated as Neighbourhood Area are recognized to have limited infrastructure capacity.	This is not true of the Salem and Hewitt’s SP areas. This wording should be amended.
2.6.1.1.c	States that “Neighbourhood Areas” are considered “established neighbourhoods” that would not experience significant physical change.	How does this relate to the Salem and Hewitt’s SP areas, which are greenfield areas under construction?

2.6.1.1.e	Permits limited levels of intensification as per the land use designations on Map 2.	What does this mean as there is nothing in map 2 that identifies where limited intensification can occur?
2.6.1.3.a. iv	Permits “additional residential units”.	What does this mean as it is not a defined term?
2.6.1.3. e	Requires a min of 50% ground floor in low rise buildings to be non-residential.	Why is this required? This also includes singles as well the way it is currently written and interpreted.
2.6.1.3. f	Requires minimum densities of 50 and 60 units per hectare.	As noted above, these minimum densities are very high, especially compared to the current density ranges in the Salem Secondary Plan. The densities within the respective Secondary Plans should continue to be respected. Also, how is the density calculated? There is no definition. Recommend using the current definition in the Salem and Hewitt’s Secondary Plan area
2.6.1.3. g	Permits additional floor area up to the applicable maximum building height.	This policy does not make sense in terms of what additional floor area is possible.
2.6.1.3.h	75% of an existing low-rise commercial plaza being redeveloped needs to have 75% of the original floor area in non-residential uses.	How and why is this necessary?
2.6.2.2	A mid-rise building is the only building type permitted.	Request that townhouse dwellings be permitted as of right in accordance with the Salem SP.
2.6.2.2. b	Restrict automotive related uses at the intersection of two arterial roads.	What is an automotive related use? Perhaps a definition should be included.
2.6.2.2. b	Requires a minimum of 50% of the “ground floor frontage” to be used for non-residential uses.	What does this mean and how will it be applied?
2.6.2.2.i), j) and k)	Permits townhouses and low-rise buildings.	Does this mean the min height is four storeys (j) to a max of 12 storeys (k)?
2.6.3.2.b)	Speak to “site alteration”	How does site alteration provide a mix of residential and non-residential uses?
2.6.4.1.a)	Restricts commercial and residential uses.	The Salem Landowners request that commercial and residential uses be included as permitted uses. Schools have been dual zoned to permit both uses, therefore the policies should reflect this.

2.6.6.1. e	Boardwalks and trails are being installed by landowners;	This policy should be clarified so that permits it.
3.1.2	Speaks to Urban Design Standards and Guidelines, both of which being mandatory.	This section is confusing and the Salem Landowners request urban design guidelines not being a mandatory policy but changed to being an encouraged policy.
3.3.1. b	Speaks to implementing a design review process for developments resulting in six or more units.	The Salem Landowners are not in agreement with another process being implemented in the City of Barrie.
3.3.2.1.a).i)	Speaks to intersection spacing density.	Why is this necessary? Too detailed for an OP and the Salem Landowners object to having a policy of this nature.
3.3.2.1.a).ii	Speaks to block length maximum of 250 metres and 120 metres in depth.	The Salem Landowners do not object to a maximum of 250 metre block length but do object to a 120 metre depth.
3.3.2.2.a-d)	Speaks to criteria related to “over development”.	This policy is too rigid where flexibility for good urban design is not being permitted. Perhaps a more general statement without the criteria would be more appropriate.
3.3.3	Requires all development applications “shall demonstrate” a number of criteria.	Again, a policy that is much too prescriptive and is not achievable for each and every application. Suggest this policy be revised to be more general in nature.
3.3.4.1	Requires a sustainable development report, including an ability to enhance indoor air quality.	What is this and why is it required? How is a sustainable report or development for that matter able to enhance indoor air quality? Again, the use of “required” and “shall” make this policy nearly impossible to achieve and again, more flexible language should be utilized.
3.3.5.1	Publicly accessible private spaces and ensure design which prioritizes the pedestrian experience.	Publicly accessible private spaces should be more clearly defined as private amenity spaces being accessible for the public will not work with liability etc. Furthermore, how does collector or arterial roads prioritize the pedestrian experience?

3.3.5.2.2	Identifies it is not public parkland. As well, a requirement of 20% being semi-public for four different housing forms.	Will the City be providing parkland credit? Again, difficult to allow public use of private spaces. Where did 20% come from? This seems much too high and not achievable.
3.4.1.	Neighbourhood Areas.	Please see comments above regarding this section.
3.4.3.n)	Speaks to buildings taller than 4 storeys.	This policy should not be applicable to the Salem area given it is a greenfield situation.
3.5	Built forms do not include back-to-back townhouse dwelling units.	As noted earlier, the Salem Landowners request that back-to-back townhouse dwelling units be a permitted housing form.
3.5.2.d)	Requires townhouses to front a public street	This would preclude the ability to do condominium tenure townhouses. The Salem Landowners request this be changed in order to permit this type of housing ownership.
3.5.2.f)	Requires 18 metre separation between townhouses not separated by a public street.	The Salem Landowners request this be amended as it would restrict condominium tenure townhouses.
3.5.3	Requires stacked townhouses to be designed to resemble a traditional street townhouse. An 18.0 metre separation is also required.	The Salem Landowners request this policy be amended as stacked townhouses by their very nature of completely different than a traditional townhouse dwelling. An 18m separation will not work with stacked townhouse unit. Recommend this policy be removed.
3.6	Provides a street tree ration of one tree for every ten parking spaces.	Why is this policy in an OP? Again, this speaks to how rigid this draft document is.
4.2.3.1.c	Speaks to 250m maximum length and 100 metre depth.	As noted earlier, 100 metre depth is not consistent nor should this be included in the OP.
4.2.3.1. f	Strongly discourages “window streets”	Why is a window street discouraged? This removes the need to have a double front or through lot situation. The Salem Landowners request this be removed.
4.2.3.2	Sets out a number of criteria related to all new municipal streets.	The dimension of municipal streets was a topic of much discussion between the Salem Landowners and the City to where

		the ROW widths, sidewalk locations etc. have been agreed to. The landowners request the existing standards continue to be applied.
4.2.3.3	Requires private roads to have the same standard as a public road.	Why? This defeats the purpose of having condominium tenure. The Salem Landowners request this policy be removed. If the issue is related to a homeowner not understanding the difference between a condo road and a public road, we suggest that a home buyers map would help to educate the purchaser on the differences.
4.3. b	Speaks to Map 5 with the planned ROW widths.	As noted in our discussions, the ROW widths went through considerable discussion and length with City staff to where an agreed ROW plan has been developed for the Salem SP. We request those ROW's be carried forward in the OP.
4.3.1.4	Sets out a number of standards for arterial roads.	Do these standards conform to the ROW width standards, as noted above and which have been approved and are being designed and built towards?
4.3.1.6.d) & e)	Speaks to frontage requirements on collector roads.	The landowners wish to have these two policies removed.
4.3.1.7.a)	Provides standards for collector roads.	Do these standards conform to the ROW width standards, as noted above and which have been approved and are being designed and built towards?
4.3.1.10	Provides standards for local roads.	Do these standards conform to the ROW width standards, as noted above and which have been approved and are being designed and built towards?
4.3.1.11	Provides standards for laneways	Do these standards conform to the 8 metre and 11.0 metre laneway standards that have been approved for the Secondary Plan areas?
4.8.1	Speaks to the ROW requirements based on Map 4 and Map 5	As noted above, the ROW's should match those that have been approved for the Salem Secondary Plan.
5.5	Speaks to ecological offsetting	As noted earlier, the landowners wish to have this section removed as any



		offsetting would be coordinated through the LSRCA.
5.6	Provides policies on parks and open spaces	This section does not conform to the executed Master Parkland Agreement the Salem Landowners entered into with the City. This section should reflect the agreement.
5.7.2	Semi-public open spaces	See earlier comment regarding semi-public spaces.
5.9.1.c) & d)	Speaks to calculating parkland based on 5% & 2% of the total gross land area.	This should be on a net basis as natural heritage features or other major infrastructure would not be included in the calculation.
6.3.1.a)	Speaks to site alteration for climate sensitive design	How does site alteration, which is a defined term, accomplish this? Suggest this be removed.
6.3.1.e)	Encourages the use of district energy systems.	As noted above, is the City of Barrie constructing a district energy system?
6.4.c)	Requires one attached or detached secondary suite for every 40 ground related units.	How was this formula created? Perhaps it should state that it encourages homebuilders to provide as an option for purchasers to purchase a secondary suite, provided the site conditions will allow for it.
7.4.1	Retail and commercial	Is retail and commercial not the same thing?
8.3.2.b)	Medium and high-density development providing public or semi-private spaces.	If the space is public, will parkland credit be provided? The same comment applies to semi-private as noted earlier.
8.4.2.b) and i)	Speaks to archaeological resources.	This Ministry of Culture looks after archaeological resources and therefore any policy suggesting the deeding of artifacts and the development of lands containing resources, should all be deferred to the Ministry as they are the approval authority for such things.
9.4.2.2.1	Speaks to “at a minimum” and “must”, the studies required for a mid-rise building.	A mid-rise building in the Salem Secondary Plan lands is different than within the built boundary and these studies may not be necessary. Perhaps this should be revised to reflect the difference.

9.5.2.i)	Speaks to the Hewitt's Secondary Plan.	Why is the Salem Secondary Plan not also referenced? Furthermore, the Salem Secondary Plan is not referenced anywhere else in this draft document.
9.5.3.k.ii)	Requires vegetation removal not occurring more than 30 days prior to grading.	This is not achievable and should be removed.
9.5.4	Provides various condominium tenures	Why is vacant land condominium not noted? This is another viable option which has been used successfully elsewhere.
9.5.9	Sets out policies related to Minor Variance applications.	The Planning Act sets out the four tests in which an application has to be examined. This section should be amended to be reflect the Planning Act and not create new test within this draft document.

#### 4. Detailed Mapping Comments/Concerns

##### Map 1

- The natural heritage system limits between the Crisdawn and Unilock lands south of Salem, west of Essa do not reflect the approved limits. The natural heritage limits have been reflected on the natural heritage plans provided previously. We can provide the digital files again, if that is of some assistance.
- Why are some parks included but not others?

##### Map 2

- The park and community hub (elementary school) which are shown on the MTO lands west of the Crisdawn subdivision on the north side of Salem are not in the correct location. These should be located on the DiPoce lands to the north, in accordance with their draft approved Plan of Subdivision.
- The approved park and school location on the H&H draft approved Plan of Subdivision is not shown.
- Exell Avenue is shown as a collector road west of Reid Drive. Given that it does not go anywhere, this section should be removed and should be shown as a local road only.
- The Community Hub designation shown at the SW corner of McKay Road West and Veterans Drive is approved for commercial uses. This designation should be amended.
- The Commercial District lands shown on the south side of McKay Road West are approved live/work dwelling units, which in accordance with the approved zoning permits residential, or live/work units. This should be revised.

- The lands fronting McKay Road West on both the north and south side for Ruby Red and Watersand within Phase 2 are not correct. The north side contains a high school and the south side contains the recreation centre.
- A road pattern with street names for the lands on the south side of McKay Road West and County Road 27 are not accurate and should be removed.
- The street pattern and street names for the lands on the south side of McKay Road East and should be removed.
- The Employment Area – Industrial designation on the south side of McKay Road East should extend to the rail line in order to better utilize that existing infrastructure.
- The NHS limits are not correct on the Crisdawn lands south of Salem, west of Essa Road.

### **Map 3**

- The Natural Linkage Area shown between the Crisdawn and Unilock lands south of Salem, west of Essa Road are not correct.

### **Map 4**

- A Future Salem Mobility Hub is identified at the SW corner of McKay Road West and Veterans Drive. This parcel is draft plan approved with commercial uses approved at that corner. This should be located on the east side of Veterans Drive along the employment lands.
- The road pattern and street names as noted above, should be removed on the south side of McKay Road West and County Road 27 and on the south side of McKay Road East.
- All trails shown should be identified as conceptual only.

### **Map 5**

- As noted above, the ROW widths are not consistent with the approved ROW widths for the Salem Secondary Plan Area. This should be revised.

### **Map 6**

- The park shown south of Mabern is not correct. This should be north of Mabern to reflect the location on the draft approved DiPoce Plan of Subdivision.
- As well, the parkland locations should reflect the executed Master Parkland Agreement.

### **Map 7**

- Same comment as above regarding the park shown on the south side of Mabern.
- Why are parks identified as “Celebration Spaces”?

## Appendix 2

- Similar to above, the lands identified as Phase 5 should have the road pattern and street names removed.

We look forward to seeing the above noted changes reflected in the revised Official Plan, and as always, we would be pleased to discuss this with you further, if required.

Yours truly,

**KLM PLANNING PARTNERS INC.**



Keith MacKinnon BA, MCIP, RPP  
Partner

cc. Salem Landowners