



64 Jardin Drive, Unit 1B
Concord, Ontario
L4K 3P3
T. 905.669.4055
F. 905.669.0097
klmplanning.com

SENT VIA EMAIL

P – 2442

June 2, 2021

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

**Attention: Ms. Michelle Banfield, RPP
Director of Development Services**

**Re: City of Barrie Official Plan
May 6, 2021 Draft
Salem Landowners Group Inc.
City of Barrie**

Dear Ms. Banfield,

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.

We are disappointed that our detailed submission dated December 22, 2020 has not been acknowledged either through a comment matrix or a track change version of the Official Plan. This would have been helpful with our review of the second draft dated May 6, 2021.

As mentioned in our previous submission, we 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**

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.

As noted previously 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.

As noted in the previous submission, the document remains very difficult and cumbersome to read and interpret. There continues to be too many sections and sub sections that it is confusing. In addition, 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 continue to 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, a significant investment in infrastructure is being planned/installed and as such, the existing Salem Secondary Plan should remain largely in place.

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 79 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.

As noted previously, the Salem Landowners request that Section 5.5, 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.

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?
2.3.2		The policies begin at “b” as opposed to “a”.
2.3.2.e.ii	Requires at least 20% of housing units in the UGC to be affordable.	This target continues to be too high which will discourage growth from occurring in the UGC.
2.3.2.f.ii	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.
2.3.4.a).iii)	Requires at least 20% of the housing units within the MTSA be affordable	This policy was not included in the first draft and in our opinion, given a significant amount of land is already draft plan approved or under construction, this policy is not achievable.
2.4.2.3.c	Requires at least 52% of new housing being high density with the DGA.	This housing mix target does not seem reasonable, especially for the Salem Secondary Plan area that was designed to have a greater mix than what is being proposed. Again, we request the current Salem Secondary Plan target mix remain.
2.4.2.3.f)	Designated Greenfield Areas require a minimum density of 79 persons and jobs per hectare.	We understand this is an error. As noted previously, the persons and jobs per hectare calculation should conform to the Growth Plan.
2.5.j)	Requires a minimum 10% of all new housing units in each year to be affordable.	Again, this target is much too high and is not sustainable. In our view, the

		requirement should be 5% across the city as a whole.
2.6.1.3.d	Requires a min of 50% ground floor in low rise buildings to be non-residential where there is no existing commercial within 450 metres.	As noted previously, this would continue to include singles with the way it is currently written and interpreted, which is not logical.
2.6.1.3.e.i) and ii)	Requires minimum densities of 50 and 60 units per hectare depending on the frontage of either a local or collector road.	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 given the density applying to local and collector roads? This is a very confusing and convoluted way to calculate density.
2.6.2.3.c	Only permits buildings with a minimum height of six storeys.	As noted previously, we continue to request that townhouse dwelling units in various forms be permitted as of right within the Medium Density designation, in accordance with the Salem Secondary Plan.
2.6.4.1.	Residential uses are only permitted as part of a mixed-use development.	The Salem Landowners request that standalone residential uses also be permitted within elementary and secondary schools along with recreation centres. This was a fundamental item within the Salem Secondary Plan that not only permits residential uses but these blocks are also dual zoned in order to provide residents that will live beside these uses a clear understanding what would be permitted should those uses not ultimately be constructed. and included as permitted uses.
3.1.2	Speaks to Urban Design Standards and Guidelines, both of which being mandatory.	The Salem Landowners request urban design guidelines not being a mandatory policy but changed to being an encouraged policy as is typical with municipal Official Plans.

3.2.2.a)	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.
3.2.3.1	Requires a sustainable development report, including an ability to enhance indoor air quality.	As noted previously, 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.
3.3.2.e)	Requires stacked townhouses to be designed to resemble a traditional street townhouse.	The Salem Landowners request this policy be amended as stacked townhouses by their very nature of completely different than a traditional townhouse dwelling.
4.2.1.a) v)	Requires avoiding the use of window streets.	Why are window streets to be avoided? Engineering standards will preclude multiple connection points to collector or arterial roads which is where this condition is typically utilized. This means you are looking for reverse frontage, through lot or flankage conditions, which are not desirable. This policy should not be included in the Official Plan.
4.2.3.2	Requires private roads to have the same standard as a public road.	As noted previously, 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.
4.3.1.2	Sets out a number of standards for arterial roads.	As noted above, this policy will seek to restrict access which will limit the ability to create a flankage situation thereby requiring either through lots or reverse frontage (also discouraged).
4.3.1.3	Speaks to collector roads.	Same comment as above.

4.3.2.c)	Speaks to the street system being coordinated with Block Plan and Plan of Subdivision approvals.	Is the City intending to implement a Block Plan process?
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.
5.9.1.c) & d)	Speaks to calculating parkland based on 5% & 2% of the total gross land area.	As noted previously, this should be on a net basis as natural heritage features or other major infrastructure would not be included in the calculation. Furthermore, there is no definition of "gross land area" in the Official Plan in which to determine what is included and excluded from the calculation.
6.3.1.d)	Encourages the use of district energy systems.	As noted previously, is the City of Barrie constructing a district energy system?
6.4.2	This section sets out some very restrictive affordable housing policies.	The Salem Landowners request the affordable housing policies be revised to encourage the addition of affordable housing units rather than being so prescriptive.
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 and 9.4.2.2.2	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.h	Requires Sub-Watershed Impact Studies be completed prior to the next phase of development.	The SIS for the Salem Secondary Plan encompassed all of the Phase 1, 2 and 3 lands within the current Salem Secondary Plan. The SIS should only be required for those identified as Phase 4 in the Salem area.

9.5.3.j	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	As noted previously, 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.
9.5.11.d	Requires the use of a hold symbol for the requirement of entering into a cost share agreement.	In our view, landowners should be required to be a member in good standing with the Salem Landowners Group prior to the submission of development applications to the city. We request this be included in the Official Plan.

4. Detailed Mapping Comments/Concerns

Many of the detailed mapping comments/concerns that are noted below have been provided to staff via a meeting on June 3, 2021. These are being reiterated for the public record.

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. As noted to staff, we will provide the approved limits.
- A park is missing on the Watersand Phase 2 lands at the terminus of Exell Avenue. This is consistent across many of the schedules.
- As noted previously, we request the streets and street names for the Phase 4 and employment lands east of Highway 400 be removed as they are not consistent with what will be ultimately shown in future draft plan of subdivision applications.

Map 2

- 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.

- 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 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 4A

- 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 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 4B

- Reid Drive south of Salem and McKay Road between Reid Drive and Veterans Drive should not be identified as a "Freight Supportive Corridor".

Map 5

- Exell Avenue, west of Reid Drive, is shown as a 24m collector road. Given it terminates at a neighbourhood park, it is our opinion this should be identified as a local road.

Map 6

- The neighbourhood Park, which terminates at Exell Avenue is not shown.
- The Stormwater Management Pond on the south side of Walker Street, immediately east of the NHS does not exist and should be removed. This should be consistent across all of the schedules.

Appendix 2

- Similar to above, the lands identified as Phase 4 West 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.

Yours truly,

KLM PLANNING PARTNERS INC.



Keith MacKinnon BA, MCIP, RPP
Partner

- cc. Salem Landowners
- cc. Tomasz Wierzba – City of Barrie