



# INNOVATIVE PLANNING SOLUTIONS

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January 04, 2023

Ministry of Municipal Affairs and Housing  
777 Bay Street  
Toronto, ON.  
M7A 2J3

**Attn: Honorable Steve Clark, Minister  
Ministry of Municipal Affairs and Housing**

Dear Minister Clark:

**Re: City of Barrie New Official Plan  
ERO Number 019-5530  
126 Bradford Street, Barrie  
Crown (Barrie) Developments Inc.**

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IPS Consulting Inc. has been retained by Crown (Barrie) Developments Inc. in providing the following comments respecting proposed amendments to the new Barrie Official Plan as adopted Feb. 14 /22. The following comments respond to ERO Number 019-5530 and speak to policies:

## Policy 3.2.1 Human Scale Design

Policy 3.2.1 d) attempts to frame built form characteristics relating to 'over-development'. While the intent of the policy is to frame the characteristics of 'over-development' the description of characteristics, set out in items i) - vi) below, should be neutral and complete. Editing is provided for clarity.

*d) The City will not support over-development. Over-development does not necessarily result from one incompatible form, but often from a cumulation of unbalanced*

characteristics. The policies of this Plan and the City-Wide Urban Design Guidelines provide direction to ensure high-quality urban design is achieved without over-development occurring on any given property. ~~At the same time, over development may sometimes occur even when permissions have been followed. Therefore, the~~ determination of over-development must be weighed across a variety of characteristics that include, ~~but are not limited to:~~

- ~~i) Development that is excessive in its demands on city infrastructure and services;~~
- ~~ii) Development that negatively impacts the public realm and local character;~~
- ~~iii) Development that proposes excessive height or density;~~
- ~~iv) Variances to the City's development standards resulting in inappropriate built form, especially where an alternative built form solution is more appropriate;~~
- ~~v) Undesirable building separation distances resulting in shadow impacts, inappropriate over-look conditions, or which significantly negatively impacts access to daylight; and,~~
- ~~vi) Development that results in other impacts to a site's functionality or that limits the redevelopment potential of the remaining block or adjacent sites, such as site access or circulation issues.~~

#### Policy 3.3.4 High-Rise Buildings

Policy 3.3.4 High-Rise Buildings provided design policies for high-rise buildings. The following policies are, in our view, overly prescriptive in their application.

*ii) Tower, being the upper portion of a building above the permitted podium height, it is slender in shape to reduce visual and microclimatic impacts of the tower and allows the podium to be the primary element of the public realm. The tower meets the following criteria: ...*

*c. Unless further direction is provided in the City-Wide Urban Design Guidelines and/or Zoning By-law, the tower ~~will~~ shall consider a setback ~~a minimum~~ of 12.5 metres from: (1) the side property line; (2) the rear property line, and; (3) the centre line of an abutting right-of-way. When a lot is adjacent to a natural area, a highway or another use where it may be appropriate to have the building closer to the lot line, an appropriate reduction of the setback may be considered to the satisfaction of the City;*

*f. Where more than one high-rise building is located on the same lot, the distance between the towers at the twelfth storey and above shall consider a ~~be at least~~ 30.0 metres separation;*

The softening of rigid criteria recognizes that there are often building design solutions that mitigate potential impacts that merit flexibility at the policy level.

Policy 6.4.2 e) iv)

Affordable Housing policy 6.4.2 e) iv) provides that:

*e) The City shall encourage the provision of an appropriate range and mix of housing options and densities to meet the social, health, economic, and well-being requirements of current and future residents. Further to this: ...*

*iv) All new residential development and redevelopment in Medium Density and High Density land use designations shall provide 15% of their housing units as affordable, in accordance with policy 2.5(l), unless a greater percentage is required as per the applicable policies in Section 2.3, across a range of unit sizes, including three-bedroom units or larger; ...*

Our request is that Medium Density and High Density designations ‘provide 15% of their housing units as affordable’ be revised to require that such developments be required to provide 5% of their housing units as affordable. The reason for this request is that the recent approval of Bill 23 establishes, pending regulation, an upper limit of 5% of the total number of units that can be required to be affordable as part of inclusionary zoning. It is appropriate that the new Official Plan reflect Bill 23 as approved.

Policy 10.2 Definitions

Policy 10.2 Definitions provides that:

*Affordable Means:*

*a) In the case of ownership housing, the least expensive of:*

*i) Housing for which the purchase price results in annual accommodation costs which do not exceed 30% of gross annual household income for low and moderate income households; or,*

*ii) Housing for which the purchase price is at least 10% below the average purchase price of a resale unit in the regional market area; or,*

*b) In the case of rental housing, the least expensive of:*

*i) A unit for which the rent does not exceed 30% of gross annual household income for low and moderate income households; or,*

*ii) A unit for which the rent is at or below the average market rent of a unit in the regional market area*

Our request is that the ‘Affordable’ definition of the new Barrie Official Plan be revised to affordable housing being defined as being priced at no greater an 80% of the average price or rent of in the year a unit is rented or sold. Again, it is appropriate that the new Official Plan reflect Bill 23 as approved.

We appreciate your consideration in this matter and are available to work with your staff to provide further clarification as necessary.

Respectfully submitted,  
**Innovative Planning Solutions**

A handwritten signature in black ink, appearing to read 'K. Bechard', with a large, stylized flourish at the end.

Kevin Bechard, BES M.Sc. RPP  
Senior Associate

Cc: Client.