

December 12, 2019

Mirrun Zaveri
Ontario Growth Secretariat
Municipal Affairs and Housing
23rd Floor Suite 2304
777 Bay Street
Toronto, ON
M5G 2E5

Dear Ms. Zaveri,

RE: Comments on ERO 019-0720 – Proposed Modifications to the Innisfil Heights Strategic Settlement Employment Area

The City of Barrie has reviewed the proposal to expand the Innisfil Heights Strategic Settlement Employment Area (IHSSEA) as outlined in ERO 019-0720. We understand that the proposal is to expand the boundary of the IHSSEA northeast and northwest above the 9th Line to the southern boundary of the City of Barrie, and south to the 6th Line. As far as we can tell, there are no proposed changes to the permitted uses.

The City has existing designated employment area lands in close proximity to this proposed expansion area and through the new Official Plan process, which is well underway, the City will likely be seeking to expand the settlement area boundary, within existing municipal boundary, for additional employment uses. Based on Provincial policy direction, the City would be seeking to situate those additional employment area lands in close proximity to key infrastructure such as Highway 400 and the existing rail line to the east of the highway. The future highway interchange at McKay will provide important freight access to the highway for the employment area lands. As is the case for our existing lands, all development in this area will be fully serviced.

Based on our review and consideration of the proposal, the City offers the following comments for your consideration.

Need for the Proposed Expansion

The City of Barrie has undertaken a Land Needs Assessment (LNA) in accordance with the Provincial methodology as part of the municipal comprehensive review to inform the development of the City's new official plan. The results of the LNA have indicated a need for additional employment area lands to accommodate the forecasted growth in jobs to the year 2041 for the City of Barrie. We believe that the LNA approach reflects good planning principles and the Provincial requirements.

Has the Town of Innisfil done a Land Needs Assessment to justify the need for this employment area expansion? The Town of Innisfil recently completed their Official Plan (approved by the County of Simcoe in October 2018) and an expansion to this employment area was not contemplated at that time. What has

changed in a year that justifies the need for an expansion at this particular time, particularly when there are approved, undeveloped employment lands in the immediate area?

Impact on Transportation Infrastructure

It is well known to the Province, in particular MTO, that there are transportation corridor/interchange challenges along Highway 400 in the Barrie area. The City is closely monitoring development in this area from a traffic perspective because of implications for the approved Secondary Plan areas and the City's significant investment in transportation infrastructure to accommodate approved growth. The City has concerns that an expanded IHSSEA up to the City of Barrie southern boundary will put additional pressure on the transportation infrastructure in this area.

Has the Town of Innisfil has reviewed the potential impacts this proposed expansion may have on the transportation network? Will the Province require the same infrastructure improvements (or contribution to) of Innisfil as the City has for development in the City's south end?

Servicing of the IHSSEA

It is unclear as to whether the intent is to offer the expanded IHSSEA as serviced or un-serviced lands. There would seem to be need to differentiate the IHSSEA lands from those within the major urban settlement area of the City of Barrie immediately to the north, in order to appropriately support a range of employment development in the regional area.

Provincial Policy Statement, 2014 (PPS) policies 1.1.1a) and e) requires municipalities to plan for healthy, liveable and safe communities by promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term and to promote cost-effective development patterns and standards to minimize land consumption and servicing costs.

What are the plans for servicing the IHSSEA? Will the Province require the lands to be serviced? If the lands will be fully serviced, from where? What is the proposed timing of providing services to the lands if they are to be serviced?

Infrastructure exists or is planned for or is under construction to service the lands within the City. Cross-municipal planning and coordination of such key growth management matters should be encouraged, if not required, by the Province.

Permitted Uses in the IHSSEA

The City has reviewed the list of the existing permitted uses for the IHSSEA and would recommend that the Province consider restricting the uses to only dry industrial uses and not permit any more employment supportive uses as the 25% restriction has already been exceeded. The expansion of the IHSSEA should not be the avenue to provide additional land area to allow further retail and commercial uses that should otherwise be directed to within settlement areas. Also, by restricting the type of employment uses to dry-industrial uses alleviates the need to extend services to this area and allows for the needed differentiation between the IHSSEA lands and the serviced industrial lands offered within the City of Barrie to provide for a range of employment development opportunities.

Possible Designation of a Provincially Significant Employment Zone (PSEZ)

The City of Barrie has been in discussions with the Province about the possibility of designating employment area lands in the south part of the City as a Provincially Significant Employment Zone (PSEZ). Although the IHSSEA is already identified and delineated within the Growth Plan, it is unclear if the Province intends on designating the IHSSEA as a PSEZ. The City would like to know how this might impact the City's designation process and new Official Plan process well underway.

In conclusion, the City of Barrie believes an expansion to the IHSSEA up to the City's southern boundary is inconsistent with the Provincial Policy Statement, 2014 policy 1.1.1d) that states "Healthy, liveable and safe communities are sustained by: d) avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas." Without a fulsome review and consideration of the matters surrounding servicing and transportation the City believes this proposed expansion is premature and requires further study before any expansion is considered and before any ultimate land uses are contemplated in this particular area.

We appreciate the opportunity to provide comments on this proposal. We are available to discuss any of the comments in our letter in order to provide you with any additional clarity you may require. If there are future opportunities to review more materials or provide further input, please let me know. Please reach out with any questions you may have. I can be reached at (705) 739-4220 ext. 5466 or at michelle.banfield@barrie.ca.

Sincerely,



Michelle Banfield, RPP

Director of Planning and Building Services