

# HUMPHRIES PLANNING GROUP INC.

June 1, 2015  
HPGI File: 07145

**Ms. Dawn McAlpine, Clerk**  
**City of Barrie**  
70 Collier Street  
PO Box 400  
Barrie, Ontario  
L4M 4T5

**Attn: Ms. McAlpine, City Clerk**

**Re: Employment Lands Conversion Policy - File - D09-ELCP**  
**June 1, 2015 – Public Meeting - Report TMP-10053**  
**Comment Letter - Osmington Inc. (50 Wood Street, 110 Fairview Road)**

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On behalf of Osmington Inc., Humphries Planning Group Inc. asks that the City of Barrie continue to recognize our client's continuing interest in the City's proposed Employment Lands Conversion Policy, which is the subject of tonight's meeting, and our request to be kept informed throughout the City's on-going process. We have been communicating with the City for several years respecting Osmington's properties located at 50 Wood Street and 110 Fairview Road. Osmington Inc. has been requesting the conversion of these two sites to non-employment uses to facilitate residential uses at its Fairview Road location and additional commercial uses on its Wood Street property. As you are also aware, we have continued to raise concern respecting the process undertaken by the City of Barrie in undertaking its Municipal Comprehensive Review process which has also resulted in OMB appeals being filed to OPA's 38, 39 and 40 regarding such matters on behalf of Osmington Inc.

We have reviewed the proposed textual changes to the City's Official Plan and are generally supportive of the changes being contemplated to Section 3.1.2.1 wherein evaluation criteria are proposed to be added to the document for the purposes of considering a land use conversion. However, the information which is currently available for tonight's public meeting is not clear as to whether the City intends to undertake a re-evaluation of the specific sites considered for conversion as part of the Watson Phase 3 report. In our opinion, it is appropriate to do so, given the changes that are being proposed by the City which are no longer consistent with the criteria that were recommended by Watson (Phase 3 of the City's Growth Management exercise) and supposedly used as background information in the preparation of OPA's 38, 39 and 40. We further note that the Phase 3 work completed by Watson did not include the 50 Wood Street site for conversion purposes as it was not vacant at that time. The site is now vacant and therefore it would be appropriate for the City to consider this site at the

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# AIRD & BERLIS LLP

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Barristers and Solicitors

Patrick J. Harrington  
Direct: 416.865.3424  
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June 1, 2015

Our File No.: 84682

Dawn McAlpine, City Clerk  
City of Barrie  
P.O. Box 400  
Barrie, ON L4M 4T5

Dear Ms. McAlpine :

**Re: Written Submission for Public Meeting Before General Committee  
Employment Lands Conversion Policy (File: D009-ELCP)  
North American Park Place Corporation**

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We are counsel to North American Park Place Corporation ("North American"), the owner and developer of the Park Place mixed-employment project located in the northeast quadrant of Highway 400 and Mapleview Drive East.

As City Council is aware, portions of the Park Place development are currently designated *General Industrial* and *Business Park* pursuant to the City's in-force Official Plan. There is also a significant amount of designated *General Industrial* lands beyond the immediate quadrants of Highway 400 and Mapleview Drive. North American accordingly has a direct interest in policy amendments that will affect the future development of Barrie's employment areas.

North American has reviewed the staff presentation on the proposed criteria for Barrie's assessment of future employment land conversions. In our opinion, further information is required from planning staff as to how these criteria would be applied if approved. There are a number of subjective terms proposed to be included in the criteria ("*on the fringe*", "*isolated from surrounding designated employment lands*", "*incompatible*", "*limited market choice*", etc.). It is not clear what evidence the City will require to satisfy these terms.

North American also submits that objective criteria be included within the proposed conversion policy. For example, there are no specific traffic or transportation infrastructure criteria included as currently proposed, nor is there any requirement for a conversion applicant to demonstrate that a proposed conversion conforms with Barrie's Transportation Master Plan (aside from a general requirement to be consistent with the City's general policy objectives). The use of objective as opposed to subjective criteria would make it easier for interested applicants to determine whether a proposed conversion would have merit.

North American is further concerned with staff's proposed policy amendment to "*establish the primacy of Industrial lands.*" We submit that the Province (through its policy plans) and the Ontario Municipal Board (through its decisions) have actively moved away from establishing a hierarchy as between employment uses. North American does not support

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elevating "industrial" employment over other types of employment such as institutional, business or office park, commercial, retail, etc. All forms of employment should be of equal importance to Barrie.

North American may have further comments/submissions once the formal official plan amendment is brought forward. For now, please accept this written submission on behalf of North American and please ensure that our office is provided with advance notice of any further reports or meetings respecting this item. Please also add our office to the list of persons requesting notice of any decision on this proposed official plan amendment.

Should you have any questions or require clarifications, please feel free to contact either the undersigned or North American's planning consultant, Mr. Ron Richards of R.G. Richards and Associates.

Yours very truly,

AIRD & BERLIS LLP



Patrick J. Harrington

PJH/

cc. S. Bishop  
R. Richards

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Attn: City Clerk, Mayor and Members of Council  
Re: Employment Lands Conversion Policy – file D09-ELCP  
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same time that the 110 Fairview Road is being re-evaluated based on the new evaluation criteria being proposed by the City.

**We request that the General Committee consider our request for conversion of these lands and direct Staff to assess these two Osmington properties as potential conversion sites based on the City's proposed criteria for the reasons set forth in this memorandum. We also request a meeting with Staff to discuss this matter further.**

Yours truly,

**HUMPHRIES PLANNING GROUP INC.**

A handwritten signature in black ink, appearing to be 'Rosemarie L. Humphries', written over a horizontal line.

Rosemarie L. Humphries BA, MCIP, RPP  
President

cc Osmington Inc.  
Merwan Kalyaniwalla, Manager of Planning Policy