

November 3, 2025

**By E-Mail Only to *clerks@springwater.ca***

Township of Springwater  
Administration Centre  
2231 Nursery Road  
Minesing, ON L9X 1A8

***Attention: Jennifer Marshall, Clerk***

Dear Mayor Coughlin and Members of Council:

**Re: Barrie Annexation Proposal  
Comments on October 31, 2025 Council Information Package**

We are counsel to the Midhurst Landowner's Group which is comprised of ten respected community builders, being: Brookfield Residential, Sundance Homes, Countrywide Homes, Geranium, Sarjeant Company Ltd., Rose Corporation, Ballymore Homes, Rosehaven Homes, Paradise Developments, and Silvercore Group.

The Group has had the opportunity to review the contents of the October 31, 2025 Council Information Package and provides the following commentary on its contents.

We provide these comments for Council's consideration prior to the Council Meeting on November 5, 2025.

**Hemson's Update – October 22, 2025**

In their update, Hemson acknowledges that a regional approach to employment land planning is needed and that Barrie, the County, and Springwater all have emerging needs. Yet, the analysis only considers Barrie's need to expand to accommodate employment land. If employment land were truly treated as regional in the analysis, then, the analysis would be agnostic about municipal boundaries. A cooperative approach to growth would prevail over a competitive race-to-the-bottom. The inconsistencies between statements and outcomes by Hemson reveal a lack of credibility.

Hemson is now indicating that, the "City needs to plan for additional employment lands well before 2051". In December 2024 Hemson concluded no additional employment lands were needed by Barrie and that the City's issue was a short-term undersupply of serviced employment land. Then, in July 2025 Hemson indicated 300 ha of employment land could

be needed by 2061. Extending the timeline to 2061 to justify annexation was an odd assumption, particularly when the regional market area could accommodate long term demands without changing municipal boundaries. Now, without indicating where their prior analysis was wrong, and with an apparent lack of new data or information, there has been yet another substantial change in opinion. At this point, Hemson's conclusions are simply not reliable.

Hemson is assuming that all growth that Barrie could not accommodate would go to Midhurst and suggests there is risk in that approach. It is unclear where that assumption comes from. Certainly, Midhurst could accommodate a good deal of growth. However, there are other communities in Simcoe County and the regional market area that could accommodate growth too. Incidentally, it does not appear that Hemson has considered the risk of overreliance on Barrie and the comparative strengths of accommodating growth in many communities, including Midhurst.

Hemson's approach involves planning for "a range and mix of housing for all age groups in *each* municipality". However, that is not consistent with the Provincial Planning Statement, 2024 (the "**2024 PPS**"). Section 2.1.4 of the 2024 PPS indicates that planning for people and homes should be done to meet the needs of the "regional market area".

Hemson's approach requires each municipality to meet new demand for every type of housing within its boundary – but that is not always realistic. As cities mature, they tend to become denser and should not be expected to accommodate low density housing at historic rates. Conversely, it would be strange to place a tower in a rural setting to satisfy such a policy. That is why the 2024 PPS focuses on the regional market area as the scale of analysis for housing - not the municipality. Focusing on the regional market area recognizes that different forms of housing will be suited to different places. It also creates a cooperative policy framework where municipalities in the same regional market area can leverage their distinctive attributes to deliver the type of housing they are best suited to provide.

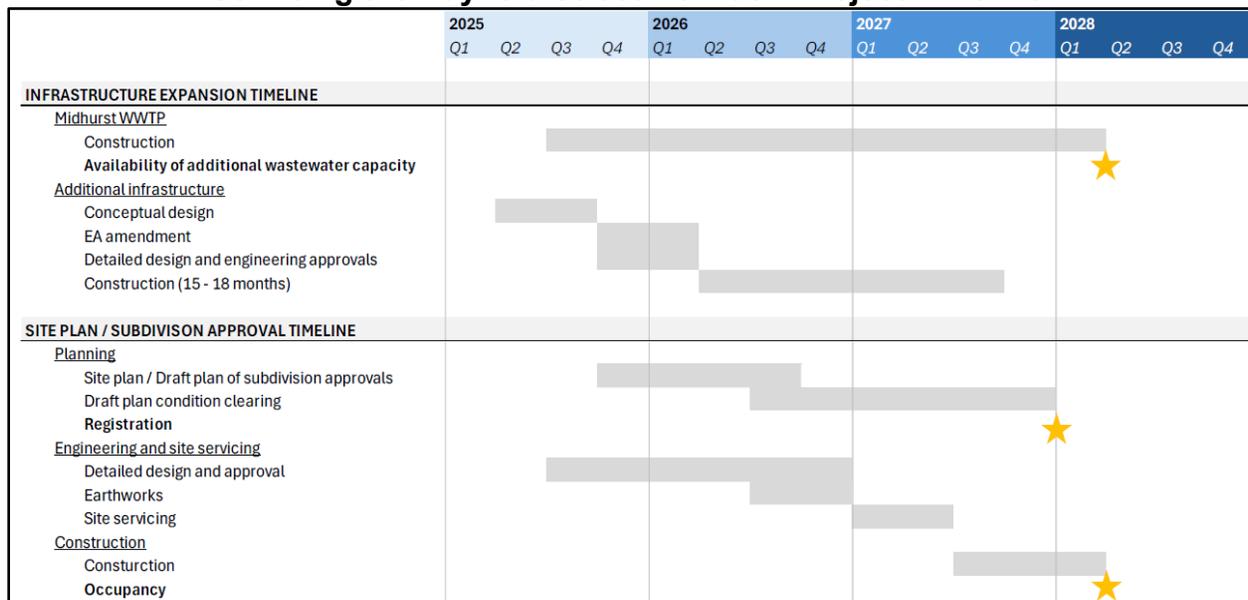
Applying the approach set out in the 2024 PPS then, if anything, Barrie should focus on complementing the regional market area by leveraging its role as a City to deliver forms of housing that are expected to be less prevalent in the surrounding area.

### **Remington Letter and MSH Report – October 27, 2025**

The Midhurst Landowner's Group acknowledges the urgency to get "shovels in the ground" as set out in Remington's October 27, 2025 correspondence.

The Midhurst Landowner's Group has laid out a realistic and defensible strategy to servicing the Remington lands by early 2028 as explained from start to finish in the project timeline chart provided below.

### Servicing the Bayfield Street Corridor: Project Timeline



The Midhurst Landowner’s Group applauds Remington’s stated urgency and reiterates its commitment to working with them to deliver their development as quickly and collaboratively as possible. Doing so will contemporaneously open up the Bayfield Street Corridor to unlock additional economic and social benefits for the Township and County.

#### Burnside Memorandum – October 24, 2025

The Group’s engineering consultants have reviewed the two-page memorandum supplied in support of the Remington proposal at 727 Bayfield Street.

Of note, this memorandum only identifies \$2.0m in costs associated with the extension of linear infrastructure to one site. That focus understates the true cost of servicing. The approach is similar to past reporting on servicing in connection with the Barrie Annexation Proposal in that it carries no expense for upsizing or used capacity in treatment facilities. Someone must pay those additional costs.

In comparison, the Midhurst servicing expansion that has been identified contemplates servicing many more sites between the municipal boundary and the area just north of Snow Valley Road throughout the Bayfield Street Corridor. This would unlock greater opportunity for accommodating growth and generate more economic and social benefits for Springwater, of which 727 Bayfield is but a part. There can be no serious comparison between servicing one site and servicing a whole area.

The Group takes a wholistic view of growth in the Corridor instead of focusing on just one or another site. The broader view holds greater opportunity for Springwater and the County.

## Parcel Economics Report – October 2025

The Parcel Economics Report assesses the economic benefits of only the Remington lands. The benefits would only improve with the servicing of the entire Bayfield Street Corridor as contemplated by the Midhurst Landowner's Group.

### Conclusion

Mayor Coughlin, Deputy Mayor Cabral and Members of Council, the Midhurst Landowner's Group sees the tremendous future potential for the County and Springwater. We ask that you do not support the Boundary Adjustment Framework as proposed by Barrie and require the Bayfield Street Corridor to be serviced by Springwater so that the greater good can be realized, together.

Yours truly,  
**DAVIES HOWE LLP**



Alex Lusty (he/him)

copy: Martha Green, Deputy Minister, MMAH  
Sean Fraser, Assistant Deputy Minister, MMAH  
Tanzeel Merchant, Regional Director, MMAH  
Hon. Doug Downey, MPP, Barrie-Springwater-Oro-Medonte  
Hon. Andrea Khanjin, MPP, Barrie-Innisfil  
Brian Saunderson, Member of Provincial Parliament, Simcoe-Grey  
Dan Mathieson, Chair, OPLDF  
Jeffrey Schelling, OPLDF  
Warden, Deputy Warden and Members of County Council  
Clerk's Office, Springwater  
Mark Aitken, CAO, Simcoe County  
Rob Elliott, General Manager, Engineering, Planning & Environment  
Nathan Westendorp, Director of Planning/Chief Planner  
Nancy Huether, Director of Economic Development and Airport Services  
Mayor, Deputy Mayor and Members of Springwater Council  
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Stacey Forfar, CAO, Springwater  
Renee Ainsworth, Deputy CAO, Springwater  
Chris Russell, Director of Planning, Springwater  
Trevor Harvey, Director of Engineering, Springwater  
Greg Bedard, Director of Finance/Treasurer, Springwater  
Joe Mullan, Ainley Group, Springwater Peer Review Engineer

Mayor, Deputy Mayor and Members of Oro-Medonte Council  
Clerk's Office, Oro-Medonte  
Sean Binns, CAO, Oro-Medonte  
Brent Spagnol, Director of Planning, Oro-Medonte  
Midhurst Landowner's Group, c/o Daniel Steinberg, Trustee