

[REDACTED]  
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April 17, 2026

City Hall (attention: City Clerk)  
70 Collier Street,  
PO Box 400,  
Barrie, ON L4M 4T5

Re: **Application for a Zoning By-law Amendment**  
Innovative Planning Solutions on behalf of Found Group Development and 126 Ardagh Inc.  
**126 and 130 Ardagh Road, Barrie**  
**City File: D30-003-2026**

Mayor Nuttal and Members of City Council,

Although I live in Barrie's East End, this Ardagh Rd. neighbourhood is my second home. I am a keen grandma and my son's family with three grandchildren live [REDACTED] next to the proposal.

## **SUMMARY AND CONCLUSIONS**

- 1) As a grandma observer, I can tell you that intensification in this neighbourhood is happening at rates far exceeding a recent Simcoe County survey, discussed in my comments below. For example, my son's home is designed with an accessory apartment. At the Patterson/Ardagh corner property, there are four housing units: two in the garden suite and two in the main house. Other nearby homes have apartments or are multi-generational. When I take my granddaughter on playdates in the neighbourhood, I discover the same, high, levels of intensification.
- 2) With respect to the RA2-1)(SP-XXX) rezoning:
  - a. I see no Official Plan policies that would justify the proposed RA-2 zone and the accompanying increase in lot coverage from 35% to 40%;
  - b. I question the safety of decreasing the minimum driveway width from 6.4m to 6.0 m., especially given the slope in this location of the site; and,

- c. I find no planning justification for removing the landscaping that would buffer adjacent backyards on Crawford Rd. from the proposed, busy driveway.
- 3) The proposed rezoning would not provide affordable housing at this time, according to the Planning Submission.
- 4) In my opinion, as a long-retired, professional planner, the proposed RA2-1)(SP-XXX) rezoning would not meet the intent and many policies of the City's Official Plan, and it would not represent good planning.
- 5) As a grandma observer, I see no justification for forcing this monster apartment complex, that does not conform with the Official Plan and has no affordable housing, onto an established, low-rise neighbourhood that is conforming with the Official Plan by quietly and effectively supplying affordable, rental housing that meets our City's needs.
- 6) In addition, I have offered an alternative proposal that conforms with the Official Plan. It would:
  - a. Orient new housing to face Ardagh Rd; and,
  - b. Protect and enhance the very water we drink by maintaining the woodlands and wetlands on this sensitive groundwater site.

## **INTRODUCTION**

With the hope that this review will assist Council and staff in your deliberations of the rezoning application. my comments will focus on the City's Official Plan and the proposal,

As a preface, I have learned that this site would be very challenging to develop at the medium residential density of 199 units per hectare, as proposed in the rezoning.

The long, narrow site is sandwiched between the backyards of Crawford and Patterson Road. This shape forces a medium density, residential building to shift orientation from Ardagh Rd to face those backyards, contrary to Official Plan policies.

In addition, the property slopes about 40 feet down from Ardagh Rd. to the northerly property line. At the proposed density of 199 units per hectare, the sloping topography would increasingly expose the underground parking.

The Architectural Drawings show that the ground floor of the building would be 10 ft. below Ardagh Rd., resulting in 6 residential storeys and 2 levels of above-grade parking at the north. The building height would range from 6 to 8 storeys. If the ground floor is brought up to Ardagh Rd., the building height would span from 6 to 9 storeys.

ISSUE	OFFICIAL PLAN	PROPOSAL	COMMENT
<p><b>1. AFFORDABLE HOUSING</b></p>	<ul style="list-style-type: none"> <li>• City is to ensure a minimum of 15% of new housing units are affordable. (<i>Policy 2.6(l), p. 28</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• Proposal “does not currently include any affordable units” (<i>Planning Rationale, p.43</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• NOT affordable housing</li> </ul>
<p><b>2. CITY GROWTH STRATEGY</b></p>	<ul style="list-style-type: none"> <li>• The Official Plan (OP) clusters higher density development to other locations in the City. (<i>Map 1</i>)</li> <li>• It is not designated for Medium Density residential development. (<i>Map 1</i>)</li> <li>• The site is located within the <i>Neighbourhood, Built up Area</i>. (<i>Map 1 and 2</i>)</li> <li>• The density range for <i>Medium Density</i> residential development is</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed density is 199 units/hectare (uph).</li> </ul>	<ul style="list-style-type: none"> <li>• The OP does not identify this location for higher growth, nor designate it for Medium Density.</li> <li>• The proposed building height of 6 – 8 storeys and density of 199 uph fall within Medium Density policies. (<i>Policy 2.6.2.3 (c) and (d) p. 36</i>)</li> <li>• The location offers little in the way of local amenities to</li> </ul>

	<p>125.0 to 300.0 units per hectare. (<i>Policy 2.6.2.2</i>)</p>		<p>justify higher density development.</p> <ul style="list-style-type: none"> <li>• For example, it is a 15-minute walk to the local school and a 13-minute walk to the food store that is not directly accessible by transit.</li> <li>• The OP suggests a 10-minute walk for providing residents' daily and essential needs (<i>3.2.2.a.7, p.66</i>)</li> </ul>
<p><b>3. VULNERABLE AREAS FOR THE CITY'S DRINKING WATER SYSTEM</b></p>	<ul style="list-style-type: none"> <li>• Map 7 "<i>Drinking Water System Vulnerable Area</i>" identifies areas of this site as a <ul style="list-style-type: none"> <li>• Wellhead Protection Area (25-year capture zone);</li> <li>• Significant Ground Water Recharge Area</li> <li>• Intake Protection Zone</li> <li>• Highly Vulnerable Aquifer.</li> </ul> </li> <li>• The entire site is a Significant Groundwater Recharge Area (SGRA) requiring a risk assessment or a hydrogeological assessment which demonstrates that the quality of groundwater in these areas, and the function of the recharge</li> </ul>	<ul style="list-style-type: none"> <li>• A Hydrogeological Report is provided.</li> </ul>	<ul style="list-style-type: none"> <li>• The Hydrogeological Report recommends more studies, including a Dewatering Assessment, Infiltration measures Groundwater monitoring and Hydrogeological investigation of the wetlands and watercourse.</li> <li>• It is not clear whether Hydrogeological Report fully meets all the Official Plan policies, as set out in 6.5.5 and 6.6.6.</li> </ul>

	<p>areas, will be protected, improved, or restored. (Policy 6.5.1.2(c), p. 144)</p>		
<p><b>4. BUILDING HEIGHT – VACANT LAND ON ARTERIAL ROAD, POLICY 2.6.1.3(d), PAGES 34-35</b></p>	<ul style="list-style-type: none"> <li>• Ardagh Rd. is an Arterial road. (Map 4b)</li> <li>• OP states that new development of “<i>up to six storeys may be permitted on vacant lands</i>”, including where: <ul style="list-style-type: none"> <li>• ii) The lands front onto and are “<i>oriented towards an arterial or collector street</i>”;</li> <li>• iii) “<i>Appropriate transitions can be achieved</i>”. See Section 3 policies of the Plan (2.6.1.3(d) p. 34-35)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• As shown on the Architectural Drawings, the exposed building height at the north end is 6 apartment levels, plus 2 levels of exposed parking.</li> <li>• Total height is 8 storeys above ground, not 6 storeys.</li> <li>• The building is not oriented to the Ardagh Rd., the collector road, as: <ul style="list-style-type: none"> <li>• (1) The main entrance faces the backyards on Crawford St.; and,</li> <li>• (2) There are just 4 units on each level facing the arterial with the bulk of the building facing backyards on Patterson and Crawford Road.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Since the site is not currently vacant (<i>there is a building on each of the two lots</i>), this Policy would not apply.</li> <li>• Even if the Policy were applied: <ul style="list-style-type: none"> <li>• (1) A building height of 8 or more storeys above ground would not conform;</li> <li>• (2) The building orientation would not conform;</li> <li>• (3) No appropriate transitions to the abutting detached dwellings are provided.</li> </ul> </li> <li>• In addition, the proposed rezoning removes the landscaped buffer for Crawford Rd properties, not even giving a landscaped buffer transition.</li> </ul>
<p><b>5. DESIGN FOR NEIGHBOURHOOD COMPATABILITY</b></p>	<ul style="list-style-type: none"> <li>• OP has many policies ensuring that proposed intensification is sensitive</li> </ul>		<ul style="list-style-type: none"> <li>• The massive scale and 6-9 storey height are not compatible</li> </ul>


<p><b>AND HEIGHT TRANSITIONS</b></p>	<p>and compatible with existing form and character and transitions between heights are appropriate. (<i>Policy 2.6.1.2.(e) p. 32-33, Policy 3.1.1b, p.62, Policy 3.2.1.b, p,64, Policy 3.2.1.d, p. 65. Policy 3.3.3.d.p.76</i>)</p>		<p>with the existing low -density form and character.</p> <ul style="list-style-type: none"> <li>• No transition is provided between the existing housing and proposed medium density.</li> <li>• The design effectively places a massive structure abutting the backyards of homes along Patterson and Crawford Roads.</li> </ul>
<p><b>6. FRAMING STREET, SHADOWING AND ACCESS TO DAYLIGHT</b></p>	<ul style="list-style-type: none"> <li>• OP states that mid-rise buildings, including its principal entrance, should frame the street it is fronting, while allowing access to sunlight for adjacent properties. (<i>Policy 3.3.1.a, p. 75</i>).</li> <li>• Shadow, view, and microclimatic studies may be required to determine potential impacts arising from mid-rise buildings. (<i>3.3.1.f p.77</i>)</li> <li>• The OP Sustainable and Resilient Design policies optimize passive renewable energy and Green Development Standards focus on maximizing solar gains (<i>3.2.3, p. 66</i>)</li> </ul>		<ul style="list-style-type: none"> <li>• Development of this site should be framed on Ardagh Rd. in keeping with the OP.</li> <li>• If the proposal proceeds, a Shadow Study should be required.</li> <li>• Protection of existing solar facilities on abutting properties also need to be considered in light of the OP’s sustainable and green development policies.</li> </ul>
<p><b>7. ARTERIAL ROAD AND DENSITY OF DEVELOPMENT</b></p>	<ul style="list-style-type: none"> <li>• in order to promotes transit supportive development, the OP states development on</li> </ul>	<ul style="list-style-type: none"> <li>• Proposal allows 199 units/hectare</li> </ul>	<ul style="list-style-type: none"> <li>• The OP wording of “<i>should</i>” is not a mandatory</li> </ul>

	<p>arterial roads “<i>should be planned</i>” to a minimum residential density of 50.0 uph. (<i>Policy 2.6.1.3 (h). p.35</i>)</p>		<p>requirement of 50 uph.</p> <ul style="list-style-type: none"> <li>• Given that the site is only 2 lots fronting on Ardagh Rd., a lesser density should be considered to meet other policies of the OP identified above.</li> <li>• In addition, I believe that intensification, such as shared units, accessory units within existing properties is already occurring at a significant amount in the existing neighbourhood</li> <li>• This intensification trend is also confirmed by an online Simcoe County survey which found 16% of respondents were living with parents, 7% of seniors living with adult children, and 50% of homeowners with an accessory housing unit and more thinking about it. (<i>City of Barrie Housing Needs Assessment p.22</i>).</li> <li>• Therefore, the minimum density of 50 uph could be</li> </ul>
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			reduced for this specific site.
<b>8. OVERDEVELOPMENT</b>	<ul style="list-style-type: none"> <li>• The OP outlines factors to identify overdevelopment.(3.2.1.d, p. 65)</li> </ul>		<ul style="list-style-type: none"> <li>• The proposed rezoning is consistent with overdevelopment considering ;</li> <li>• height and density;</li> <li>• impacts on the local residential character;</li> <li>• impacts on the natural features of the woodland, wetlands and sensitive groundwater area;</li> <li>• shadow impacts;</li> <li>• overlook impacts; and,</li> <li>• access to daylight.</li> </ul>
<b>9. AN ALTERNATE DEVELOPMENT OPTION FOR THIS SITE</b>	<ul style="list-style-type: none"> <li>• The Official Plan would permit an up to 4-storey development facing on Ardagh Rd., as long as it meets the:</li> <li>• 1) The transition policies in Section 3;</li> <li>• 2) It is oriented towards Ardagh Rd; and,</li> <li>• 3) Servicing availability can be confirmed (2.6.1.3 p. 32)</li> </ul>		<ul style="list-style-type: none"> <li>• I would suggest that this option be considered for the area of the site fronting on Ardagh Rd. as it would conform with the Official Plan.</li> <li>• Further, I would suggest that the remainder of the site to the north be kept natural.</li> <li>• The natural lands would enhance and benefit the proposed development, the</li> </ul>

			<p>neighbourhood and the environment by:</p> <ul style="list-style-type: none"><li>• (1) maintaining and replanting the woodland;</li><li>• (2) protecting the wetlands; and,</li><li>• (3) that by protecting and enhancing these natural features, the sensitive groundwater area would be protected.</li></ul>
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Sincerely,



Barbara Marshall.



## FORMAL WRITTEN OBJECTION

### Proposed Zoning By-law Amendment — File D30-003-2026

126 & 130 Ardagh Road, Barrie, Ontario (Ward 6)

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<b>TO:</b>	City Clerk, City of Barrie — cityclerks@barrie.ca
<b>CC:</b>	Riley Anderson, Senior Planner; Councillor Nigussie Nigussie (Ward 6)
<b>DATE:</b>	April 16, 2026
<b>RE:</b>	Formal Objection — Proposed Zoning Amendment, File D30-003-2026
<b>SUBJECT:</b>	126 & 130 Ardagh Road — R2 to RA2-1(SP) Rezoning Application

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### Executive Summary

This submission constitutes a formal objection to the proposed rezoning of 126 and 130 Ardagh Road, Barrie from Residential Single Detached (R2) to Residential Apartment (RA2-1)(SP). The application proposes a 6-storey, 153-unit apartment building on land currently consisting of two single-detached dwellings.

The proposal fails multiple tests of consistency with the Provincial Policy Statement (PPS) 2020, the City of Barrie Official Plan, and Zoning By-law 2009-141. It represents an infrastructure shock to an established low-density neighbourhood and should be refused in its current form. At minimum, approval must be deferred until independent peer-reviewed engineering confirms that local infrastructure — specifically downstream sanitary sewer capacity, stormwater management, and road operations — can support the proposed density without adverse impact on existing residents.

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## 1. Inconsistency with the Provincial Policy Statement (PPS) 2020

### 1.1 Policy 1.1.3.3 — Intensification Must Be Infrastructure-Supported

The PPS requires that intensification be based on existing or planned infrastructure. The leap from 2 residential units to 153 represents an infrastructure massing shock. The developer has not demonstrated that the existing arterial road network, sanitary sewer system, or downstream stormwater infrastructure can absorb this volume of growth at this specific location. This application fails the 'orderly development' consistency test required by PPS Policy 1.1.3.3.

### 1.2 Policies 1.1.1(h) and 2.1 — Natural Heritage Conservation

The PPS mandates the conservation of biodiversity and natural heritage features. There are documented reports of unauthorized tree removal having already occurred on this site. Under Private Tree By-law 2014-115, developers are prohibited from removing trees on lands subject to a development application without specific permits. Any tree removal occurring after a development application is deemed “complete” without a specific permit is a direct violation.

Consequently, this would make the developer's "Tree Preservation Plan" factually inaccurate and obsolete.

This constitutes a direct failure to comply with provincial natural heritage protections under PPS Section 2.1. The City should not grant zoning approval until:

- A Certified Arborist's Report has been submitted and independently peer-reviewed;
- A full Ecological Restoration and Offset Plan has been prepared and accepted by the City;
- The developer has demonstrated compliance with Barrie's Private Tree By-law (2014-115), which explicitly protects trees on lands subject to a development application; and
- A forensic audit should be undertaken of the site's natural heritage has been completed by the City (refer to Exhibit A in the Appendix B)

Note: Given that Barrie's current ecological offsetting policy is valued at approximately \$57,500 per hectare, the extent of the unauthorized removal has direct financial and remediation implications that must be quantified before zoning proceeds.

### **1.3 Policy 1.6.6.1 - Planning for Sewage and Water Services**

The PPS mandates that planning for sewage and water services must protect human health and safety. Failing to provide a Downstream Capacity Analysis, the developer is asking the City of Barrie to ignore a potential threat to the "human health and safety" of existing residents on Moon Drive due to sewage system backups.

By creating a statutory deficiency in parking, the developer is also violating this policy. The reduction in parking leads to congested streets that impede emergency response, directly impacting neighborhood safety and road operations. These infrastructure pressures are compounded by the creation of new sightline obstructions from on-street parking overflow, which further diminishes the operational safety of the site. Consequently, the City of Barrie has a provincial mandate to refuse this development application.

## **2. Technical Deficiencies — Traffic and Site Layout**

### **2.1 Failure of the Traffic Impact Study (TIS)**

The developer's Traffic Impact Study (TIS) likely concludes that road impacts are within acceptable thresholds. However, the study appears to rely on averaged daily trip generation figures that do not adequately reflect the specific operational safety capacity and geometry of Ardagh Road. The following deficiencies should be addressed:

- **Peak-Hour Saturation:** 153 units will generate a pulsed traffic load during morning and evening peak hours. The TIS does not appear to have conducted a sightline analysis or capacity assessment for the specific grade and alignment characteristics of Ardagh Road at this access point.
- **Bottleneck Risk:** All vehicle trips will concentrate at a single or limited points of ingress/egress onto an arterial road. This creates queuing and bottlenecking conditions that threaten the safe and efficient movement of existing neighbourhood traffic — a standard the Official Plan expressly requires development to meet.

The TIS should be updated to include a sightline analysis specifically for the grade of Ardagh Road during winter conditions. Without a proper sightline analysis, particularly for winter conditions, there is no evidence that emergency vehicles can safely ingress, egress, or stage on

the road during a pulsed traffic load from 153 units. This is a “real-world” safety concern that theoretical traffic models often miss. Intensification can not be prioritized over resident safety.

## **2.2 Emergency Response Resulting from Spillover Parking**

Any reduction in on-site parking ratios through Special Provisions will result in overflow onto Patterson Road and Moon Drive. This will narrow the operational width of local streets, creating pedestrian safety hazards and predictably impeding emergency response. Narrow functional width of the side streets due to overflow parking can delay the turning radius and set-up time for heavy fire apparatus (aerial ladder trucks). At the same time, the overflow of parked cars on the street will obstruct the required clear sight triangles, creating a hazardous environment for vehicles exiting the 12.0m unlandscaped and blindspots for drivers and pedestrians. This will jeopardize the safety of pedestrians and motorists attempting to navigate the Ardagh Road corridor.

The City of Barrie must refuse any parking reduction that fails to meet the 1.5 spaces per unit mandate established in Zoning By-law 2009-141 on the basis of resident safety. By definition this is a statutory deficiency: it is not a minor variance and it externalizes the developer’s costs onto the existing neighborhood, as residents and guests will be forced to park on Moon Drive or Patterson Road.

The developer is only asking for reduced parking because they have designed a building that is too large for the lot. If they reduced the unit count from 153 to a lower number, they could meet the legal parking requirement in Zoning By-law 2009-141. Therefore the deficiency is a choice, not a necessity of the land and reflects the self-created hardship standard.

## **2.3 Secondary Egress — Statutory Deficiency (Special Provision Request)**

The developer is requesting a Special Provision to allow a 12.0-metre wide secondary egress that is NOT landscaped. This is a significant departure from the standard 7.0-metre landscaped buffer requirement under Zoning By-law 2009-141, Section 5.3.

This request is a self-created hardship. The developer is sacrificing required safety buffers and pedestrian-supportive streetscape elements in order to maximize building yield on a constrained site. This institutional encroachment turns a residential streetscape into a commercial-style loading zone.

Rather than demonstrating thoughtful site design, this Special Provision signals that the development program is fundamentally too large for the parcel. The Ontario Land Tribunal (OLT) has consistently treated such requests as evidence of over-development, not as minor technical adjustments.

The removal of the landscaped buffer creates a Pedestrian-Vehicle Conflict Zone in direct conflict with the Official Plan's 'Pedestrian-Supportive Streetscape' policies.

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## **3. Infrastructure and Servicing Gaps**

### **3.1 Downstream Sanitary Sewer Capacity — Application is Premature**

The developer's Functional Servicing and Stormwater Management Report may demonstrate that the site can connect to the municipal sewer network. However, demonstrating a physical connection point is not sufficient. The developer has not provided adequate evidence of downstream sanitary sewer capacity beyond the site boundary.

High-density infill in established low-density neighbourhoods routinely triggers Inflow and Infiltration (I&I) issues in aging municipal pipes. The sudden surge in daily sanitary flow from 153 units — effectively equivalent to adding a mid-sized apartment complex to a system designed for single-detached homes — creates a material risk of sewage backup into existing basements on Moon Drive and Patterson Road (see Exhibit C in Appendix B).

The City should require the developer to submit an independent I&I Analysis addressing downstream capacity before any zoning decision is made. The OLT has held in numerous precedents that the burden of proof lies with the applicant to demonstrate that infrastructure can support the proposed density. This application has not met that burden.

### **3.2 Stormwater Overload — Impervious Surface Increase**

The developer is requesting an increase in permitted lot coverage to 40%, compared to the standard maximum of 35% under Zoning By-law 2009-141 (see Exhibit A in Appendix B). This 5% increase in impervious surface may appear minor in isolation, but at this site scale it meaningfully increases stormwater runoff volumes entering the municipal storm sewer system.

The City of Barrie's 2025 Corporate Asset Management Plan identifies storm sewers as high-value infrastructure assets (valued at approximately \$1.55 billion) requiring careful capacity management. Approving increased lot coverage without a rigorous peer-reviewed stormwater analysis creates a downstream flooding risk for adjacent homeowners. This risk must not be externalized onto existing residents where they could incur significant financial costs, especially if home insurance coverage excludes flooding provisions.

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## **4. Failure of Compatibility and Step-Down Transition**

### **4.1 Incompatible Built Form — Massing Shock**

The City of Barrie's Official Plan (Section 3.1) and the PPS both require that intensification be compatible with the existing built form of established neighbourhoods. Compatibility does not mean sameness, but it does require a graduated transition in scale and massing.

The proposal jumps directly from Residential Single Detached (R2) to a 6-storey Residential Apartment (RA2-1). There is no intermediate transitional form — no townhouses, no mid-rise step-up.

A 6-storey building placed directly adjacent to 1- and 2-storey bungalows is an abrupt massing change that is a violation of the City of Barrie Official Plan Section 3.1 regarding compatible transitions.

This application fails the Compatibility Test established by the OLT in cases such as *Gisondi v. Toronto*.

### **4.2 Angular Plane and Privacy Violations**

The City's Urban Design Guidelines (Section 4.3) require that buildings respect the Angular Plane — typically a 45-degree angle measured from adjacent residential property lines — to prevent excessive shadowing and loss of privacy for neighbouring properties.

Given the proposed building's height, massing, and the reduced setbacks implied by 40% lot coverage, it is highly probable that this development violates the angular plane requirement for

properties on Moon Drive. The adverse impact on sunlight, privacy, and peaceful enjoyment for existing residents constitutes a direct harm that the planning framework is designed to prevent.

### 4.3 OLT Precedent — Self-Created Hardship

The constellation of Special Provisions being requested in this application — increased lot coverage, unlandscaped secondary egress, and potentially reduced parking — collectively constitute a pattern the OLT has described as Self-Created Hardship.

The developer's request for a 12.0 unlandscaped egress is a direct admission that the 153-unit building is too large for the constraints of the lot and qualify as a statutory deficiency. By doubling the width and removing the greenery, the developer is not just asking for a minor variance; they are effectively creating an "Institutional" loading zone in a residential neighbourhood.

The developer is attempting to fit a building program that exceeds what the site can reasonably accommodate by systematically waiving the protective standards of the Zoning By-law.

The use of Special Provisions should not bypass the City's fundamental safety and design standards purely to increase profit or unit yield.

The OLT has held that Special Provisions should not serve as a mechanism to bail out a design that is fundamentally too large for the parcel.

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## 5. Closing Statement and Requested Actions

For the reasons set out above, I respectfully request that the City of Barrie:

1. **Refuse the proposed Zoning Amendment** (File D30-003-2026) in its current form as inconsistent with the Provincial Policy Statement 2020, the City of Barrie Official Plan, and Zoning By-law 2009-141;
2. **Alternatively, defer** any decision pending the completion and independent peer review of:
  - (a) a **Downstream Sanitary Sewer Capacity and Inflow and Infiltration (I&I) Analysis** - a certified Downstream Capacity Analysis is required prior to any decision to ensure engineering risks to Moon Drive and Patterson Road are fully understood;
  - (b) a certified **Arborist Report and Ecological Restoration Plan** addressing unauthorized tree removal; and
  - (c) a revised **Traffic Impact Study (TIS)** incorporating a peak-hour certified **sightline analysis** specific to the Ardagh Road geometry including winter conditions. This analysis must prove that the removal of the 7.0m landscaped buffer, concurrently with sightline obstructions from anticipated on-street parking overflow, will not result in a safety hazard;
3. **Require** the developer to demonstrate that all Special Provisions are genuinely minor, including the 12.0m unlandscaped egress and **statutory deficiency** in the parking space ratio; and
4. **Direct** City of Barrie planning staff to conduct a **forensic natural heritage audit** to quantify the pre-development canopy cover and ensure that any remediation costs or fines under the Private Tree By-law 2014-115 are settled as a condition of the application process.

*The broad public interest is not served by approving a development that creates a permanent infrastructure deficit, degrades established neighbourhood character, and ignores clear statutory safety requirements. Approval of this application in its current form would establish a detrimental precedent that ‘Special Provisions’ can be used to bypass fundamental planning protections for the sake of over-development. This application fails to meet the mandatory consistency tests of the PPS and the City of Barrie Official Plan and should be refused.*

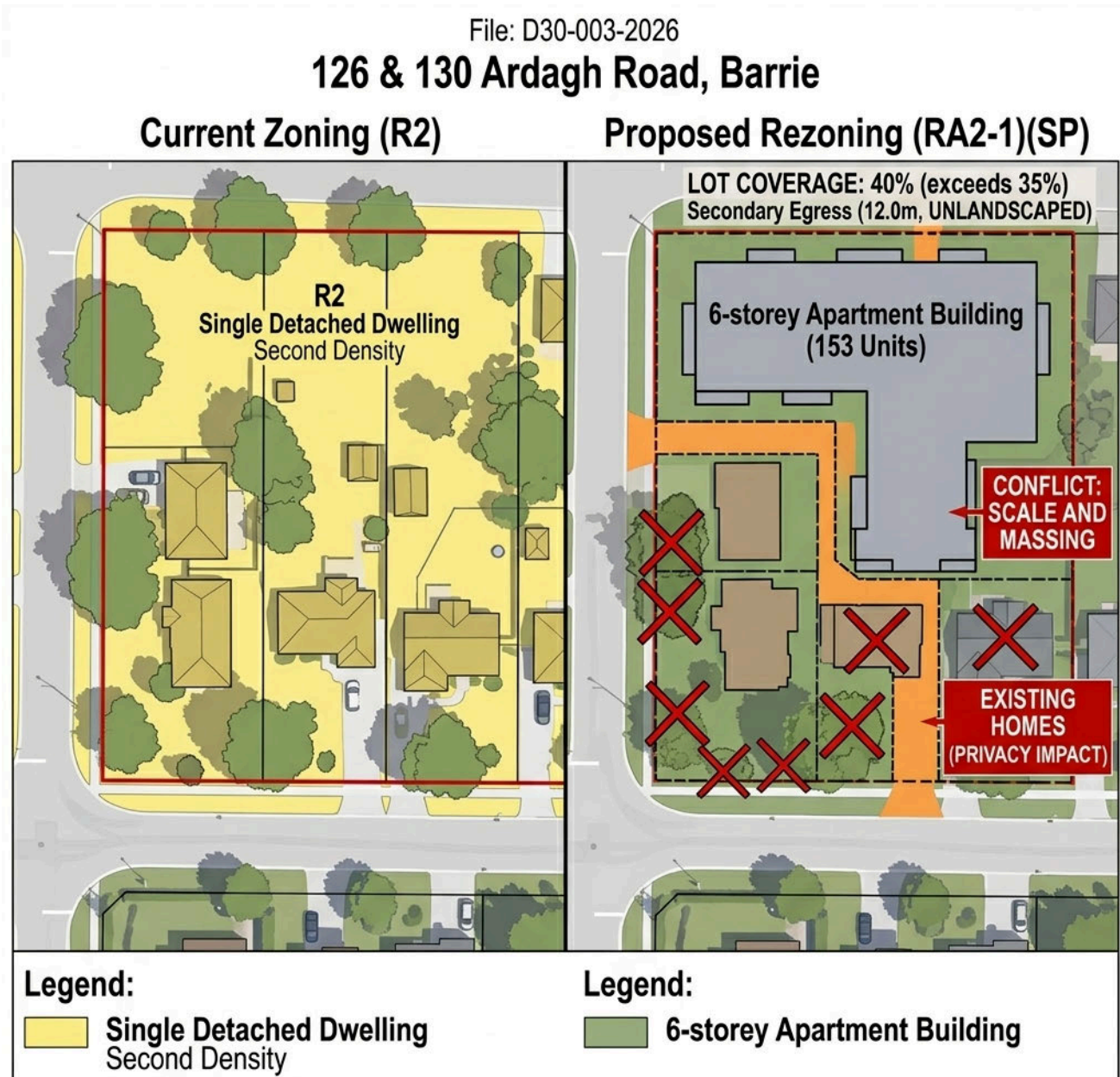
## Appendix A: Summary of Statutory Conflicts

Planning Principle	Policy Reference	Conflict Identified
Angular Plane	Barrie Urban Design, Section 4.3	6-storey massing violates the 45-degree privacy/shadowing buffer required adjacent to R2 properties.
Step-Down Transition	Barrie Official Plan, Section 3.1	No graduated density transition. Abrupt jump from 1-storey homes to a 6-storey apartment — incompatible built form.
Impervious Surface / Lot Coverage	Zoning By-law 2009-141	Requested 40% lot coverage (standard: 35%) increases stormwater runoff beyond site and downstream capacity.
Natural Heritage / Vegetation	Private Tree By-law 2014-115 & PPS s.2.1	Documented unauthorized tree removal violates provincial natural heritage policies and local conservation mandates.
Emergency Access / Streetscape	Zoning By-law 2009-141, Section 5.3	Request for 12.0m unlandscaped secondary egress removes required 7.0m landscaped safety buffer; concurrently, on-street overflow creates sightline obstructions — a statutory deficiency.
Intensification	PPS 2020, Policy 1.1.3.3	Intensification not supported by existing infrastructure — jump from 2 to 153 units exceeds planned network capacity.
Parking Ratio	Zoning By-law 2009-141	Statutory deficiency in parking ratio forces overflow that narrows the functional width of the street for emergency staging.
Sewage and Water	PPS 1.6.6.1(b)(4)	Infrastructure prematurity; failure to protect human health and safety due to unverified downstream capacity and I&I risks

## Appendix B: Visual Exhibits

### Exhibit A — Site Plan: Current Zoning vs. Proposed Rezoning

The aerial comparison below illustrates the scale of transformation proposed. The current R2 zoning (left) shows two single-detached dwellings with significant tree canopy and permeable surface. The proposed RA2-1(SP) footprint (right) reveals 40% lot coverage, elimination of natural features, and the unlandscaped 12.0m secondary egress highlighted in orange.



**Image 1. Plan 126 & 130 Ardagh Road, Barrie (File D30-003-2026)**

*Exhibit A: Site Plan Comparison — Current R2 Zoning vs. Proposed RA2-1(SP) Footprint (File D30-003-2026)*

## Exhibit B — Streetscape Perspective: Failure of Step-Down Transition

This streetscape perspective illustrates the massing incompatibility between the proposed 6-storey apartment building and the existing 1-2 storey homes along Ardagh Road. The absence of any step-down transition — from apartment directly to bungalow — constitutes a failure of compatible built form as required by the Official Plan.

### STREETSCAPE PERSPECTIVE: ARDAGH ROAD (FILE D30-003-2026)

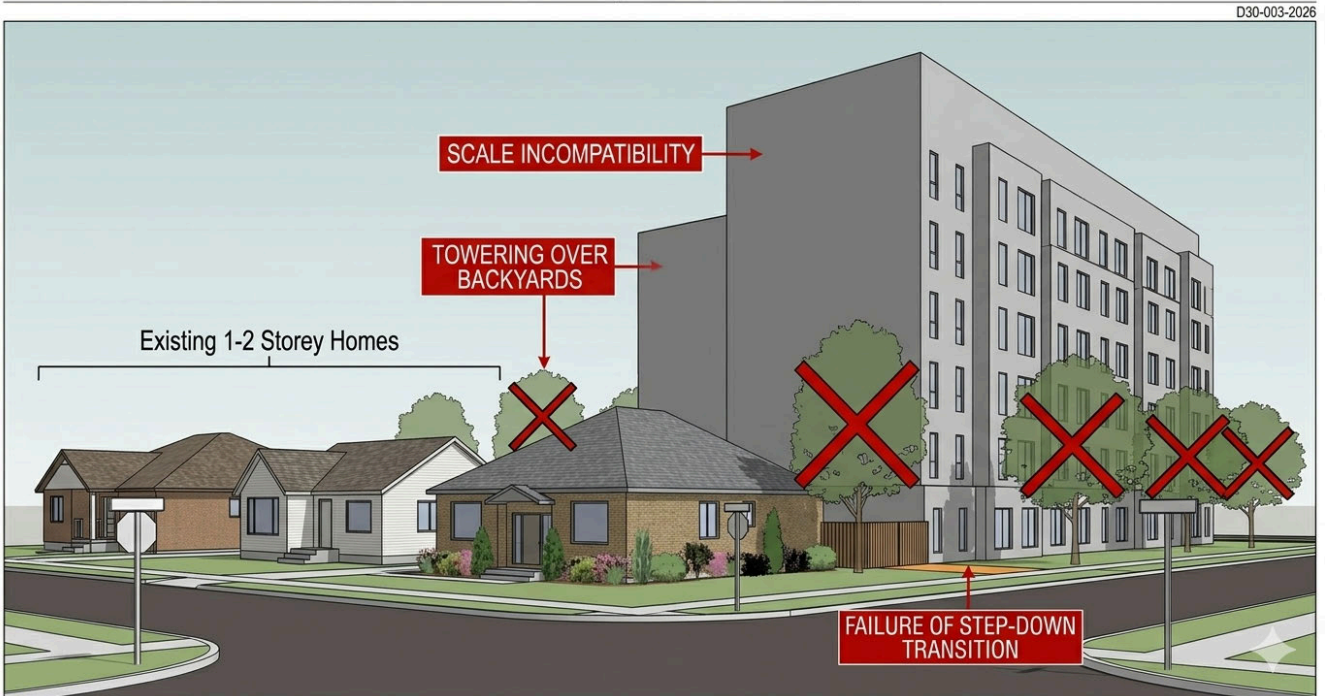


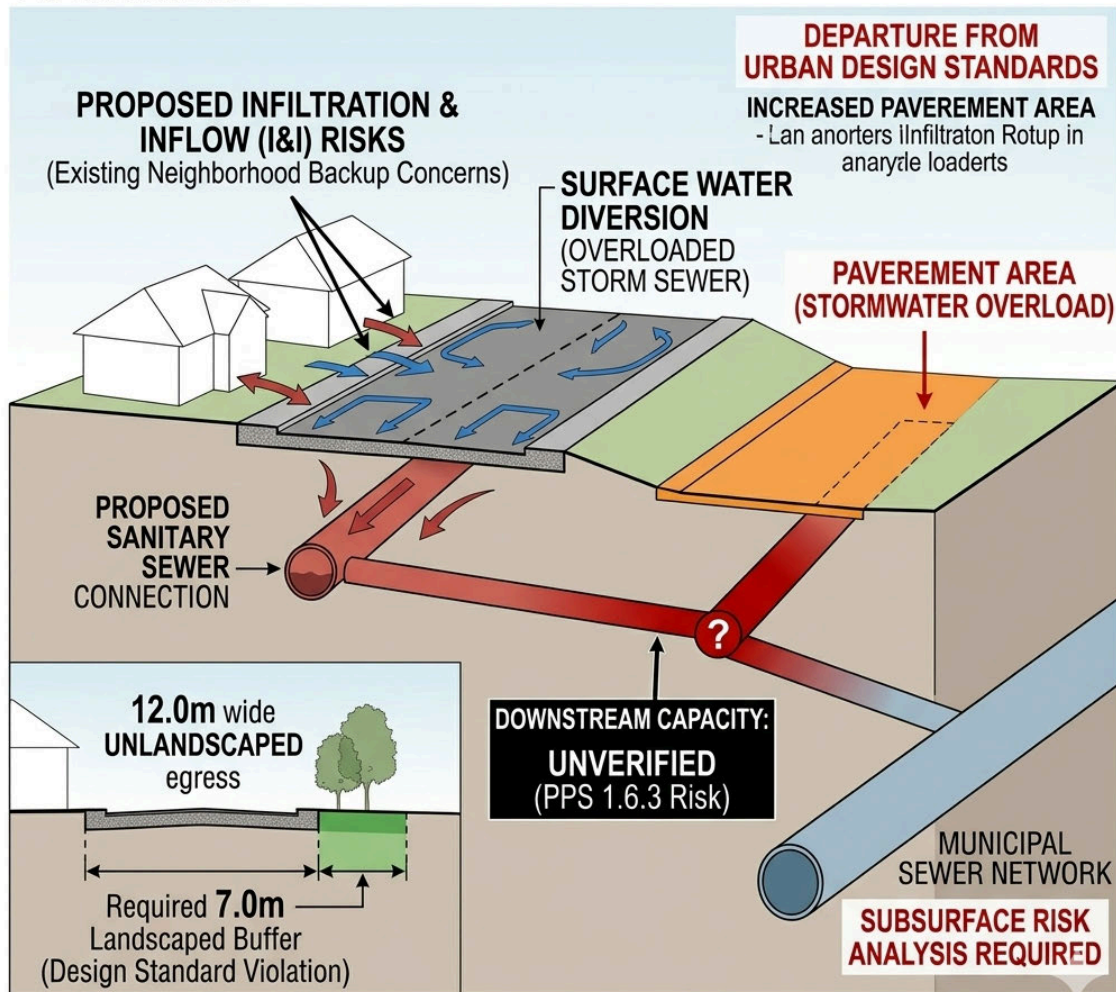
Exhibit B: Streetscape Perspective — Scale Incompatibility and Failure of Step-Down Transition (File D30-003-2026)

## Exhibit C — Subsurface Infrastructure Risk Diagram

This schematic cross-section visualizes the downstream sanitary sewer risks and stormwater overload concerns arising from the proposed 40% lot coverage. It highlights the unverified downstream sewer capacity connection and illustrates the inflow and infiltration (I&I) risk pathway that could cause sewage backups in existing neighbourhood basements.

### 126 & 130 Ardagh Road, Barrie

File D30-003-2026



File D30-003-2026

Exhibit C: Subsurface Infrastructure Risk — Downstream Sanitary Sewer (Unverified Capacity) and Stormwater Overload Risk (File D30-003-2026)

**Statement on Use of Generative AI:** Portions of the content in this statement were generated or referenced with the assistance of AI tools. These sections were reviewed, edited, and incorporated by the author to ensure accuracy, relevance, and alignment with the intended message.

To Whom it May Concern,

My name is Elaine Kennedy and I am the homeowner of  
I am requesting that the re-zoning/development proposal for the six-story  
apartment building at 126 and 130 Ardagh Rd be denied.

My concern is primarily with the height of the building.

How in the world is a six-story apartment building essentially  
placed in the back lane of an existing neighbourhood  
acceptable? There simply is not the depth in lots to  
accommodate the height of this proposal. A six-story  
building will significantly affect the quality of life of the  
adjacent neighbours. **WE LITERALLY WOULD HAVE A BRICK  
WALL IN BACKYARDS—THIS IS COMPLETELY UNFAIR  
IN ALL ASPECTS!**

Please do not approve this application. I'm sure the neighbours would be okay  
with a compromise—perhaps a three-story.

Again, I respectfully request that this application be denied.

Sincerely,

Elaine

Craig McNair

City Hall  
Attn: City Clerk  
70 Collier Street, PO Box 400  
Barrie, ON, L4M 4T5

Re: Application for Zoning By-Law Amendment to RA2-1)(SP-XXX)  
Innovative Planning Solutions on behalf of Found Group Development and 126 Ardagh  
Inc.  
126 and 130 Ardagh Road, Barrie  
City File: D30-003-2026

Mayor Nuttal and Members of City Council,

Since I have spent a lot of time reviewing the technical studies for this application to the RA2-1)(SP-XXX) Rezoning.

I have concluded that:

1. The technical studies do not demonstrate the feasibility of this massive, proposed development with its 199 unit/hectare density, up to 30-meter height (as permitted in the RA2-1 Zone), as well as the proposed 40% lot coverage.
2. The technical studies give me no peace of mind about the negative impacts with respect privacy, access to daylight, mental health, investment solar roof system, potential flooding, etc.
3. In my opinion, given the City's inventory of proposed 25,000 housing units and likely more modest population growth, it would not be prudent to approve this rezoning application that does not conform with the Official Plan and the technical reports are inadequate.
4. The application at 126 & 130 Ardagh Road is not in the best interests of the community, the neighbourhood, nor the city and should not be approved at this time.
5. Under Ontario Reg. 41/24, this site should have been classified as a wetland. It meets the definition of a wetland in multiple ways: by having a water table close to the surface, by having soil with an abundance of water, and by the wetland vegetation which is present and by the cedar and birch forest which the owner illegally destroyed.

The site should be evaluated for Environmental Protection status level 3, in accordance with the city's Official Plan to protect both sites of groundwater features, and to protect the forest which prior to the illegal tree removal met the size criteria of 0.5 hectares and above.

The city should consider Environmental Protection designation and require replanting of the forest to restore it to the state which ought to have been assessed and designated as protected prior to any unauthorised and illegal site alteration.

A SUMMARY is provided on the next pages, followed by my detailed comments in the section, titled BACKGROUND.

## **SUMMARY OF MY CONCERNS ABOUT THE TECHNICAL STUDIES**

### **S.1 Limitations of the Hydrogeological, Geotechnical, and Functional Servicing and Stormwater Reports**

- S.1.1 The investigations are based on the original proposal of 42 townhouses with single floor basements and thus were limited to 6.5m boreholes.
- S.1.2 The previous townhouse study is not adequate to assess the viability of the latest application with its 6-floor apartment building, 3-floors of underground parking, and with the ground floor units facing Ardagh Rd up to 3 m below ground, as shown on the Architectural Drawings.
- S.1.3 Boreholes identified high groundwater levels (often at less than 1 metre) and later filled with water above ground level. This indicates a pressurised aquifer, and likely a superficial and deep aquifer.
- S.1.4 Since floor slab foundations must be at least 500mm above the seasonal high groundwater elevation, because of the high groundwater, floor slab foundations are not feasible, and basements are not recommended, without raising the grade.
- S.1.5 Under Ontario Reg. 41/24, Lake Simcoe Regional Conservation Authority needs to investigate the unmapped wetlands and aquifers to determine if permanent development restrictions are required. Under the regulation, this site meets the definition of a wetland, and meets the criteria for environmental protection under the city's Official Plan 5.3.1e) as a site of significant groundwater. Under OP 5.4.2.3 a) this

site would have met the criteria for Environmental Protection Area Level 3 based on meeting or exceeding the minimum threshold of 0.5 hectares of woodland.

- S.1.6 WMI's proposal of using LID stormwater tanks will not work because of the high groundwater, and aquifers. Soil infiltration estimates are likely not adequate as they did not account for the high groundwater and aquifers.
- S.1.9 The existing stormwater system is undersized and cannot handle the stormwater flow, if proper accounting for the lack of soil infiltration is considered.
- S.1.10 A sewage tank and sanitary pumping uphill to Ardagh Road will be required, with no plan in place to manage water issues affecting the foundation and subsurface walls of the building, nor prolonged power outages.

## **S.2 More studies are required**

### **S.2.1 Shadow Study**

The partial shadow analysis provided does not conform with the Shadow Study requirements of the City of Barrie. At 6, 7 and 8 floors above ground, the proposed building will have a tremendous negative impact on existing neighbours' yards, gardens, greenspaces, and rooftop solar panels. That does not include the overlook, loss of privacy and accompanying mental health stresses for all the families that are impacted.

Furthermore, the RA2-1 Zone, according to the City's Zoning By-law, allows a building with maximum height of 30m or 98.4 feet. Since there are no Special Provisions to reduce this height in the rezoning, I would suggest that the next Shadow Study be based on the maximum building height, as permitted in this zone.

The impacts on potential rooftop, solar systems need to be thoroughly investigated, as well. In Australia, for example, over 50% of housing now have solar systems. The study needs to assess the long-term economic loss to all homes affected by shadowing, even if the systems are not currently installed.

rooftop system would be severely impacted by the proposed building. It has been a considerable investment as the system has a 50-year payback face a 50-year financial loss.

### **3.2.2 Potential oil contamination**

Greg Barker (IPS planner) confirmed the presence of oil drums on the site. At the Feb. 20, 2025, neighbourhood meeting, he noted that the illegal tree removals of 2024 were needed to remove the oil drums and debris from the site. Neighbours had also observed oil drums. The owner had told Soil Engineers Ltd. that there were no oil drums or spills or debris.

A second phase environmental assessment with evaluation for soil contamination must be required.

### **3.2.3 Flooding impacts on neighbouring properties**

With this massive building and lot coverage, underground parking, sloped topography, high water table and impermeable soil conditions, flooding beyond the site needs to be considered.

A study is required identifying the potential extent of flooding on adjoining properties and the neighbourhood both during and after construction.

For example, I am concerned that the proposed, perforated pipe drainage along the edge of my property may pose a serious flooding risk, because of the ineffectual water management system.

### **3.2.4 Functional Analysis of the Forest and Groundwater Management**

Prior to the owner illegally cutting down part of the forest on this site, the trees were effective at removing much of the persistent surface water across the property, minimizing flooding and supporting a healthier groundwater system.

A cost/benefit analysis is needed to assess the value to the City's groundwater resources and the local ecosystem of returning the portion of the site that was clearcut, back to a forested condition while maintaining the forest, wetlands and watercourse on the site.

### **3.2.4 Housing Inventory**

With 25,000 housing units in the City's approval pipeline, no justification has been provided to approve this project at this time.

## **BACKGROUND**

### **SOIL ENGINEERS LTD. REPORT**

- The owner has claimed there were no spills, leaks, drums or hazardous materials on the site.
- Soil Engineers Ltd.: On the basis of this statement, the firm recommended that no further environmental site assessment would be required.
- Greg Barker, planner at IPS, advised during neighbourhood meeting of February 20, 2025, that trees had to be removed (illegally) in 2024, to allow for extensive cleanup of debris and multiple oil drums.
- Neighbours had observed oil drums on the property.
- A second phase environmental assessment with evaluation for soil contamination must be required.

### **CAMBIUM HYDROGEOLOGICAL AND GEOTECHNICAL REPORTS**

- Boreholes were drilled to 6.5m, based on the original proposal of 42 townhouses with one floor basements. The projected excavation depth for the 3-floor underground parking garage would be 10m. Deeper excavations are required to evaluate the water and soil conditions.
- LID (stormwater storage tank) requires a minimum vertical separation of 1m between the bottom LID insert and the maximum groundwater elevation. Groundwater measurements showed groundwater at 0.88 to 1.21 mbgs. An LID stormwater insert tank is not feasible for this site, according to measurements at either the north or south end of the property.
- Under Ontario Reg. 41/24, the Lake Simcoe Regional Conservation Authority needs to investigate the unmapped wetlands and aquifers to determine if permanent development restrictions are required.
- Boreholes at the site contained water above ground level, indicating a pressurised aquifer. Construction of the proposed 3-floor underground parking garage requires excavating into the aquifer, which cannot be permitted due to the prohibition on permanent de-watering.

- Cambium notes in their report that floor slabs must be at least 500mm above the seasonal high groundwater elevation. Because of the high groundwater, floor slab foundations are not feasible, and basements are not recommended, without raising the grade.
- Further investigation is required to understand the complex groundwater situation at the site and indicate both superficial and deeper aquifers.

#### WMI FUNCTIONAL SERVICING AND STORMWATER REPORT

- The WMI report never mentions the aquifers or high groundwater from Cambium's investigation.
- The firm operated on incorrect assumptions for water infiltration into the soil based on soil type.
- As neighbours have witnessed, standing water can pond on the surface for days, weeks and longer.
- Any estimate of stormwater infiltration is greatly underestimating the risk of overloading the city stormwater system.
- The 98.8m section of storm sewer within Moon Drive is undersized. Because of failing to account for reduced infiltration from the high groundwater and aquifers, it is highly likely the load on the storm sewer system will be much greater than predicted.
- WMI proposed an underground stormwater storage tank. per Cambium's Geotechnical report. Such LID tanks won't work because of the high groundwater level, requiring a minimum of 1 meter from the bottom of the storage tank to the maximum high groundwater level (which in the northern portion of the site is consistently less than 1 meter below ground surface even in July when groundwater levels are not at their highest).
- WMI erroneously assumed that swales would allow for water infiltration. However, their assumption would not work because of the aquifer and the water table. WMI needed to read the Cambium report. Neighbours have observed persistent standing water as proof that WMI's assumed infiltration through swales, or grass would not be effective.
- WMI has also not considered that the perforated pipe drainage along the edge of the property may pose a serious flooding risk to neighbouring properties, because of the ineffectual water management system which is being proposed.

- WMI also discusses lawns and rainwater harvesting as methods for promoting water infiltration. This is absurd given the obvious lack of infiltration on the site, and the aquifers. And rainwater harvesting would require storage tanks which could not be built due to the high water-table, and releasing the water will simply result in additional flooding.
- Before the owner illegally removed part of forest on the site, the trees were effective at removing much of the persistent surface water across the property.
- An internal sanitary pumping system will be required to bring sewage from a holding tank up to Ardagh Road. WMI offers no solution for how to prevent future sewage leaks into the lower levels and into neighbouring properties in the event of prolonged power failures, or of structural damage to the tank and the building foundation from flooding and ice damage resulting from potential inadequate management of the high water-table on the site and the aquifers.

#### SHADOW STUDY

- The applicants have not provided a Shadow Study that meets the City's requirements.
- Requirements include all existing and proposed buildings, parks, open spaces, yards, and the shadows of all existing buildings.
- The impact analysis needs to be performed for April 21, June 21, September 21 and December 21, at hourly intervals beginning 1.5 hours after sunrise until 1.5 hours before sunset.
- The Shadow Study must show that there is adequate sunlight for parks, open spaces, private amenity areas and surrounding streets to maximise their use through spring, summer and fall afternoons and evenings.
- These criteria are not addressed by the existing drawings. They only show times during the late morning, noon, and no later than 5pm in the summer and fall. Nor do the drawings show existing buildings, yards and amenity areas. This prevents a proper evaluation of shadow impacts.
- Even the limited drawings show full obstruction of light to existing rooftop solar installations in the afternoon to the east, while not showing the similar impact on properties throughout the morning to the west of the proposed development.

- In addition, the 6-8 floor height above ground level will also have significant negative impact on existing rooftop solar installations, as well as impacting the right of residents to install future rooftop solar installations, without experiencing undue hardship as a consequence of the proposed development.

### Population Growth Concerns

- Previous growth projections for the City of Barrie have suggested a 2031 population of 209,390 that may prove unrealistic. The 2021 population was just 147,845, for example. As the chart below indicates, Barrie’s population growth has been modest with an increase of 19,420 from 2006 to 2021.
- Nearly all of that increase is in those aged 55+.
- At the same time, the population of children declined by 7%, or by 2,680.
- Considering the declining birth rate, the substantial decline in non-permanent residents from ending the foreign student visa programs (resulting in a national population loss so far approaching 2 million with close to half of those who have left living in Ontario), the future growth for may turn out to be far less than the estimates which the city and the province have been encouraged to use.
- In addition, the city should well consider that developers with longer term and well-researched plans for Harvie Road and Bryne Drive, are currently selling off land in excess of 100 acres rather than building.

Population Age Distribution, City of Barrie					
Age Group	2006		2021		Growth (2006-2021)
0-19 (Children)	36,515	28%	33,835	23%	-7%
20-24 (Students/New Grads)	8,555	7%	10,050	7%	17%
25-44 (Young Adults)	40,535	32%	41,265	28%	2%
45-54 (Middle-Aged Adults)	17,815	14%	19,485	13%	9%
55-64 (Young Downsizers)	11,030	9%	19,690	13%	79%
65-74 (Mature Downsizers)	7,095	6%	12,665	9%	79%
75+ (Older Adults)	6,880	5%	10,855	7%	58%
All Groups	128,425	100%	147,845	100%	15%

Source: Statistics Canada.

- Since the city has already invested in infrastructure upgrades for development which may not occur, maybe even never, it would be in the best interests of our entire community to pay attention to our changing demographics, needs, and concerns, and take the time to consider which projects are good long-term investments, and which projects are not.

Sincerely,

Craig McNair

Good afternoon,

I am unable to attend the public meeting on April 22nd, but I would like to express my **STRONG OPPOSITION** to the rezoning of 126 and 130 Ardagh Road to allow for a 6 storey apartment building.

I have owned my home [REDACTED] since 1986. The many many reasons why a 6 storey apartment building is undesirable in our residential neighbourhood should be pretty obvious to all Councillors, but here are a few of my main concerns:

>Old timers will tell you that the area has a number of underground springs. I am **EXTREMELY CONCERNED** about drainage from ground and rain water when a building of that size reduces the amount of soil there is to absorb the moisture. I have lived in my home for over 39 years. In the early years, our sump pump never went off and there was never any pooling in our yard. Later, as the area to the south of Ardagh Road (and up the hill) became developed, we noticed an increase in the water that drains into our yard. We now have pools of water in the back yard, the sump pump goes off continually in the Spring and we have had to put sand bags at the edge of our walkway to prevent the water that comes flooding down the street during a heavy rain from flooding our walk;

>The local roads can barely handle the traffic we currently have. Ardagh Road is just two lanes with bike lanes and a central turning lane. An apartment building full of people will add significantly more vehicles making driving and especially walking in the neighbourhood more dangerous;

>A 6-story structure will overwhelm surrounding homes and the apartment dwellers will be able to see directly into the backyards and homes of existing homeowners which will be very disconcerting. The environment of the whole neighbourhood will be compromised and not what drew existing families to this neighbourhood in the first place;

>The higher concentration of people will lead to more ambient noise, traffic, and general disturbance compared to our existing quiet neighbourhood;

>A building of that size can block natural light, turning surrounding homes and yards into permanent shade which can be depressing for home owners and not conducive for gardens;

>Many of the homes in the area older, and I am concerned about the strain on existing water, sewer, and utility systems which have not been upgraded for many years.

Given more time, I'm sure I could think of more reasons why a 6 storey apartment building on Ardagh Road is a BAD idea, but I appreciate that the Council is taking opinions of residents into advisement and ask that you not succumb to corporate greed.

Thank you,

Laurel Lamb

Regarding this development;

Unfortunately I will be unable to attend personally [REDACTED]  
[REDACTED]  
[REDACTED]

However I wish to express my opposition to this project.

As a 36 year resident of this area, some comments I would like to make "for the record".

I'm the original owner of [REDACTED] I watched them build my house, and I was delayed moving in by 5 months due to water issues. My first foundation collapsed due to water intrusion [I have pictures!] along with other houses in this area requiring special construction methods.

In fact, the builder, Valentine homes, had to retrofit an easement with drainage tiles for all homes on Crawford and Elizabeth streets. To this day, many homes downhill from me have sump pumps running all year.

Older homes on the East side of Crawford still have water issues, some I know still run on sand-point wells, or have older, unused tile wells in their basements.

The proposed development will have similar issues.

There is a 14 meter [46 foot] elevation difference between the top and bottom of this development. That's a heck of a toboggan run! Water run-off will be uncontrollable for those homes at the bottom of the street. Flooding will be an issue, and there is partially buried stream running thru this area as well that can be seen in some backyards.

I, and many of us who live in this area, bought deliberately in an area of single family homes specifically for that lifestyle and privacy. To now try and revise from the original Town-House development to a massive 6-story apartment tower is TOTALLY out of character with the neighborhood. In fact, the original Town-House plan is inappropriate for this area of single family homes. This will adversely affect our enjoyment of our property, our privacy, and the value of the biggest investment, our homes. I will be challenging the tax assessment of my home if this development happens.

This land owner has also illegally removed trees from this property without a permit or notification to the surrounding owners, demonstrating bad faith to to the city. Was he ever prosecuted for this transgression?

There is a proposal directly across the street for another 19 unit development, and just west of Elizabeth street on Ardagh road, is the Hebredden development for another 80-ish

stacked townhomes. Further along Ardagh towards old Highway 131 there are additional development proposals as well.

This is way too much development for a supposedly "quiet" residential neighborhood!

What became a surprise was to find out that these were rental units, which totally will not fit into this neighborhood. There will be no pride of ownership for these units. Who will be the landlord? Who will supervise these units?

Having lived here since 1989 I know some of the history of this area, and the 2 land parcels in question, and how they came into the possession of the current owner. I know that these properties would be developed eventually, but the current concept is totally out of character with the neighborhood, and the interests of the property owners around it.

My wife and I are retired, she was an engineering tech [REDACTED] designing roads. She is familiar with developers and subdivision planning. Tragically most developers "get whatever they want" from City staff.

I hope not in this case as you all presumably work for, and with us, the voters and residents of this neighborhood and city.

Mark Zimmermann

[REDACTED]