

Hemson Consulting Ltd

1000 – 30 St. Patrick Street, Toronto, ON M5T 3A3

416-593-5090 | hemson@hemson.com | www.hemson.com

### **MEMORANDUM**

To: Nathan Westendorp, Director of Planning/Chief Planner, County of Simcoe

From: Michael Skelly and Stefan Krzeczunowicz

**Date:** April 17, 2024

**Re:** Review of Barrie Employment Land Needs

#### **EXECUTIVE SUMMARY**

A municipal boundary adjustment has been proposed to provide additional employment land supply to the City of Barrie from the Township of Oro-Medonte. In the context of the City of Barrie's long-term Employment Area land needs, this boundary adjustment is not required.

- The City of Barrie's Land Needs Assessment, completed as part of its MCR, provided the estimated employment land need to 2051. A review of this analysis and a preliminary estimate of current employment land supply for Barrie does not reveal any major issues that would lead to the conclusion that additional employment lands are required beyond what is current designated in the City's Official Plan.
- The proposed boundary adjustment lands in the Township of Oro-Medonte are not well-suited for employment uses given the distance from existing and developing Employment Areas in the south and also due to the presence of an existing adjacent residential area to the west. Barrie's existing vacant Employment Area supply, concentrated mainly in southern Barrie, is superior across a number of site selection considerations in comparison to the proposed boundary adjustment lands.
- The Township of Oro-Medonte already has a relatively large supply of existing designated Employment Areas located along Highway 11 that can accommodate employment land demand in this part of Simcoe County.

#### INTRODUCTION

Hemson Consulting was retained by the County of Simcoe and Township of Oro-Medonte to review the City of Barrie's long-term Employment Area land needs. The review is being undertaken in the context of a recent proposal for a boundary adjustment from the Township in order to provide additional employment land supply for the City. The purpose of the review is to determine:

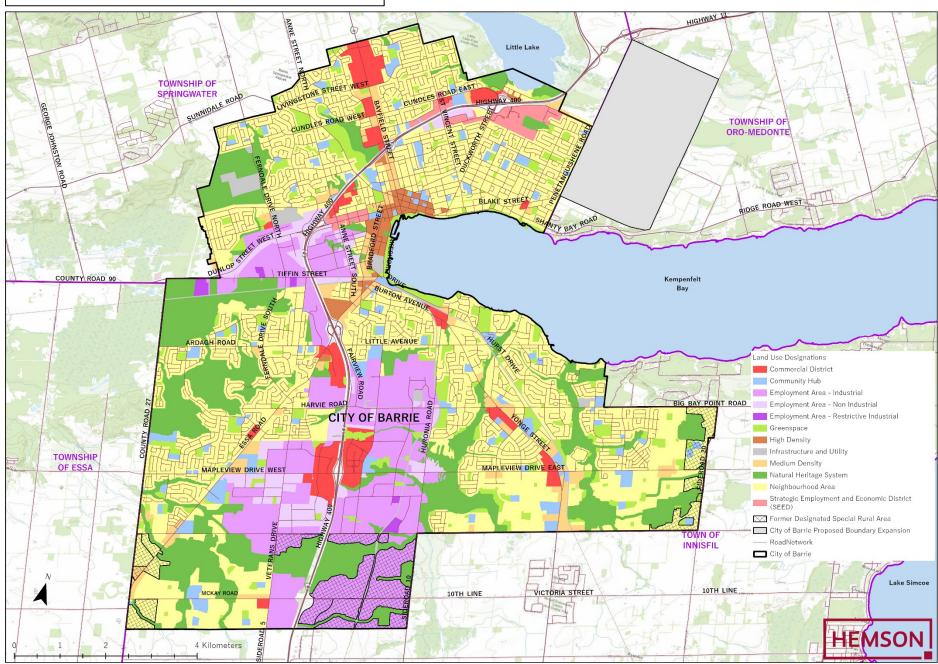
- whether Barrie's new Official Plan designates sufficient Employment Area lands to accommodate the City's employment forecasts to 2051; and
- if not, what opportunities exist either inside or outside the current City boundary for additional Employment Areas. In this respect, the suitability of the lands within the proposed boundary adjustment area in Oro-Medonte for employment uses is assessed. Map 1 shows the proposed boundary adjustment lands as the shaded grey rectangle, east of Penetanguishene Road.

This memorandum summarizes the review results and is divided into four sections:

- A. Review of City's Land Needs Assessment (LNA) prepared in support of City's Municipal Comprehensive Review and new Official Plan
- B. Review of Barrie's Long-Term Employment Land Supply
- C. Review of Suitability of Proposed Boundary Adjustment Lands in Oro-Medonte for Employment Area Uses
- D. Conclusions



Map 1 – City of Barrie Land Use Designations



#### A. REVIEW OF CITY OF BARRIE LAND NEEDS ASSESSMENT

The City of Barrie's LNA was set out in three reports issued between 2019 and 2021 as part of the City's Municipal Comprehensive Review (MCR).

#### i. LNA Report 1 – Long-Term Urban Land Needs Study to 2041 (May 2019)

The first report, the Long-Term Urban Land Needs Study released in May 2019, identified a land need of 116 additional hectares of Employment Area for the City to 2041, as outlined in Table 1.

Table 1: City of Barrie Employment Area Land Need – May 2019

Determination of Employment Area Land Need	
Employment Area Jobs Forecast at 2041	44,780
Jobs Accommodated in Existing Employment Areas at 2041	40,700
Jobs Requiring New Employment Area at 2041	4,080
Target Density of New Employment Area	35 jobs per gross developable ha
New Employment Area Land Need	116 ha

Source: Municipal Comprehensive Review, Long-Term Urban Land Needs Study, City Barrie, prepared by Watson & Associates with Dillon Consulting Limited and Tate Economic Research Inc., May 21, 2019

The 116 hectares of additional Employment Area land need was proposed to be accommodated within 273 hectares of Designated Special Rural Area lands that were located on either side of Highway 400 at the southern edge of Barrie and designated for future employment land purposes. Although within the City's municipal boundary, these lands were outside the Barrie urban boundary at the time. They have since been brought into the City's settlement area (see Map 1).

In our view, the methodology and key assumptions used in the Long-Term Urban Land Needs Study are generally reasonable and consistent with the Province's Land Needs Assessment Methodology as it was at that time.

• One of the areas that could be questioned is the Employment Area density assumptions used in the report. The target employment density of 35 jobs per hectare for new Employment Areas in the Designated Special Rural Area is nearly 60% higher than the observed densities in Barrie of 22 jobs per hectare in 2018. The target is also 13% higher than the planned minimum density of 31 jobs per hectare prescribed for new development in Employment Areas by Policy 2.3.5.g of the City's Official Plan. It appears that the report did use the Official Plan density target for growth occurring on vacant



employment land within the City's existing urban boundary; the higher target was used only for lands within the Designated Special Rural Area.<sup>1</sup>

- The report justifies assuming higher densities for new development based on densities associated with recently developed employment uses, known developments in the nearterm, and a wider range of uses on new Employment Areas (including multi-tenant and some major office uses). However, the report does not provide specific examples of these development projects. As such, it is difficult to assess the merits of this assumption.
- The report assumes that 8% of all forecast Employment Area jobs will occur as intensification on existing underutilized lands, based on recently observed development trends in Barrie and a review of potential intensification sites in the City. In our view, this assumption is reasonable. We note that in 2051, the Employment Area employment growth resulting from this level of intensification would only amount to less than 5% of the City's total employment base, which is what we tend to observe in large Employment Areas in the Greater Toronto Area.

#### ii. LNA Report 2 – Addendum to 2041 Long-Term Urban Land Needs to 2041 (May 2020)

The second LNA report, the "Addendum Report", was released in 2020. This follow-up analysis responded to several recommended Employment Area conversions that reduced the City's Employment Area land supply by approximately 53 gross hectares. The net effect of this change was to increase the employment land need to 170 gross hectares by 2041. Other assumptions from the 2019 LNA report remained unchanged.

#### iii. LNA Report 3 – Final Land Needs Assessment to 2051 (May 2021)

In response to the Province extending the forecast horizon of the Provincial *Growth Plan for the Greater Golden Horseshoe* (Growth Plan) from 2041 to 2051, a final LNA memorandum report was prepared in 2021. The Growth Plan increased Barrie's employment forecast from the 129,000 jobs in 2041 to 150,000 jobs in 2051. Of the 21,000 additional jobs, 580 jobs were assumed to be accommodated in existing community areas and 14,940 jobs were assumed to be "population-related" and located in the Community Area.

The remaining 5,481 jobs were earmarked for the remaining available supply of Employment Area in the City. In the 2021 memorandum, this remaining supply within the Designated

<sup>&</sup>lt;sup>1</sup> The 35 jobs per hectare density target is a "gross" developable land rather than a "net" development lot area figure; and a net density measurement of about 41 jobs per net hectare would be equivalent. Gross density includes all developable land including private and publicly-owned land (the latter used for roads and stormwater utilities for example), but excluding non-developable environmental features. Net density measures only privately-owned parcels of land, excluding public roadways as well as non-developable lands.



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Special Rural Area was estimated to be 145 gross hectares. Using the same 35 jobs per hectare density as the earlier LNA, an Employment Area potential of 5,075 jobs was estimated for these lands. The remaining Employment Area jobs were assumed to be accommodated as intensification at the 8% rate previously assumed.

In reviewing the Final LNA report, we note that:

- While it is not uncommon to determine additional Employment Area job growth based on the available employment land supply, the way in the final LNA memorandum arrives at the 145 hectares of Designated Special Rural Area is unclear. The earlier reports had stated that there were 273 hectares of Designated Special Rural Area for employment use. Subtracting from this the 170 hectare Employment Area land need in the Addendum Report leaves 103 hectares, rather than 145 hectares.
- The job growth of 14,940 to 2051 which is assumed to be population-related employment results in a relatively high ratio of jobs to population growth in the City. A typical ratio for a mid-size city such as Barrie, which serves as a regional service centre, is about one population-related job for every 4 to 5 residents; the Final LNA is premised on a somewhat higher ratio of approximately 1 to 3. That said, the higher ratio could be partially offset by an assumed increase in the major office employment forecast for the City from 2041 to 2051.
- Finally, in keeping with the Provincial LNA methodology at the time, there does not appear to have been any adjustment made for long-term vacancy in Barrie's employment lands in any of the City's work. For Employment Areas in most municipalities, there are properties that remain vacant over the long-term because they are too small, or awkwardly configured, or otherwise not conducive for Employment Area development. A standard adjustment would remove about 5% of the total occupied and vacant supply which would remain in long-term vacancy, having the effect of reducing the vacant supply assumed to be available for development. A corresponding adjustment in Barrie would mean that more employment land would be required to meet 2051 employment forecasts than what has been identified in the City's LNA.

On balance, the LNA assumptions highlighted above that could be modified would likely result in only a minor increase in the City's Employment Area land need over the next 30 years. As such, we conclude that the findings of the City's LNA are fundamentally reasonable and defensible. Given the densities assumed for vacant Employment Areas (new and existing) are at the upper end of potential densities on future Employment Areas, and the apparent lack of an allowance for long-term vacancy, our view is that the calculated Employment Area land need is likely the minimum land need required in the City to 2051.



#### B. REVIEW OF BARRIE'S EMPLOYMENT LAND SUPPLY

The employment land supply used in the City's LNA was estimated as of January 2018 and was adjusted for approved employment land conversions. A desktop analysis supplemented by in-person visits for some sites was undertaken by Hemson which provided a preliminary updated supply estimate to a year-end 2023 baseline. All parcels designated for Employment were identified from the City's Official Plan. Vacant parcels were identified using MPAC property codes and ortho-photography. The revised estimate totals 793 hectares, which is slightly higher than the City's LNA estimate (see Table 2). It is noted that approximately 7% of these areas is potentially constrained based on topographical and/or environmental feature constraints.

Table 2: City of Barrie Employment Land Supply Estimates (gross hectares)

City of Barrie LNA Estimates – 2018	Hemson 2023 Estimate	
<ul> <li>Vacant designated employment land – 472 ha (adjusted for conversions)</li> <li>Estimated additional employment land need to 2041 – 170 ha</li> <li>Additional land need to 2051 – 145 ha</li> </ul>	<ul> <li>Vacant – No employment activity – 627 ha</li> <li>Vacant – Evidence of employment activity – 59 ha</li> <li>Vacant – Evidence of topographical and/or NHS constraints – 59 ha</li> <li>Vacant – Evidence of site preparation – 48 ha</li> </ul>	
Total vacant employment land: 787 ha	Total vacant employment land: 793 ha	

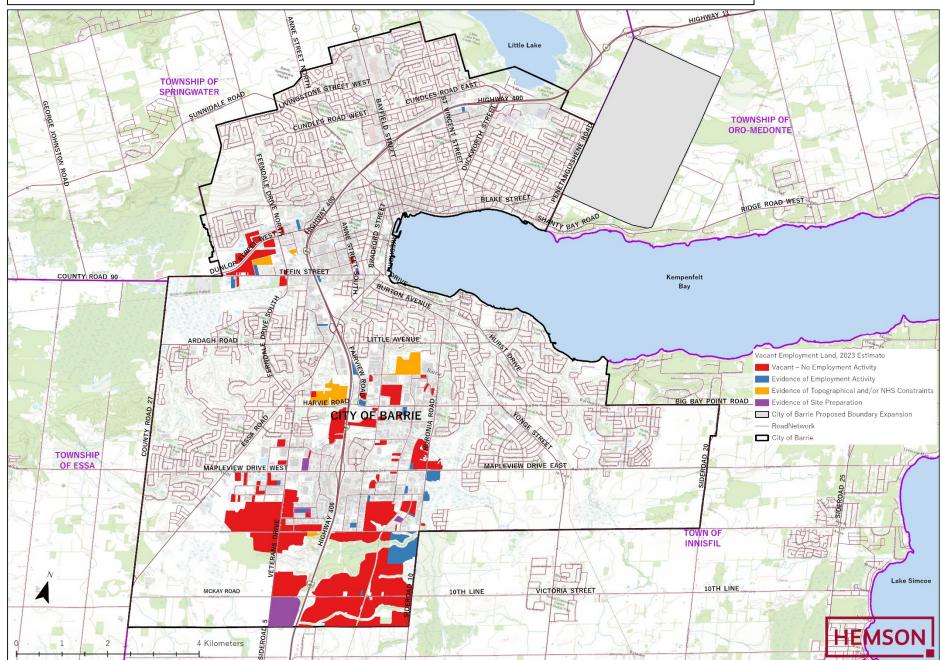
Source: Municipal Comprehensive Review, Long-Term Urban Land Needs Study, City Barrie, prepared by Watson & Associates with Dillon Consulting Limited and Tate Economic Research Inc., May 21, 2019; Addendum Report May 19, 2020 and Dillon Consulting Memo, May 5, 2021; Hemson estimate, which excludes parcels under 0.5 ha.

Map 2 shows the location of the preliminary updated vacant employment land supply for Barrie.

While it is challenging to provide an accurate estimate of employment growth on employment lands in the City since 2018 due to less reliable employment data collected during the COVID-19 pandemic, the employment land supply as of 2023 still appears to be sufficient to meet forecast demand to 2051. In this regard:



Map 2 – Barrie Vacant Employment Land, 2023 Estimate, for parcels 0.5 hectares and greater



- The 2019 Long-Term Urban Land Needs Study to 2041 states that as of January 1, 2018, approximately 276 gross hectares or 53% of the City's designated Employment Areas were "shovel-ready" with available water and wastewater servicing. While an updated analysis of available serviced employment lands has not been undertaken for this review, this estimate of serviced lands appears to indicate that a sufficient supply of employment land exists to meet short and medium-term needs, even considering recent development over the last 5 years.
- A large share of the City's vacant employment land supply is located in South Barrie (in Employment Areas south of Mapleview Drive). These lands comprise employment lands in the Salem secondary plan area approved about 8 years ago along with vacant lands within the previous Barrie urban boundary. The vacant Employment Area in South Barrie exhibit a generally flat topography with good access to Highway 400 and the ability to provide a range of parcel sizes and configurations. These lands are planned to be serviced in the City's infrastructure master plans and an area-specific development charge (DC) is already in place to pay for required water, wastewater, transportation and other growth-related infrastructure.
- The apparent servicing delay for the Salem lands relates to wastewater infrastructure and the need for a funding agreement with local developers. In 2021, an agreement was reportedly negotiated,<sup>2</sup> with the approval of "the big pipe" that would allow Salem to build out over the next 10 to 15 years. Developers in the area were reportedly working to construct a pumping station to allow development to proceed sooner than the anticipated seven years for construction for the big pipe. These reports imply that servicing of the Salem lands would be well underway by the late 2020s. Based on the timing of infrastructure projects in the City's DC background study, the area would be fully serviced well before 2041.
- The employment lands in South Barrie, including those in the Salem secondary plan area as well as the lands added through the former Designated Special Rural Lands, provide the City with the best opportunity for a "full service" employment cluster, including large industrial developments. While claims have been made that water and wastewater servicing may be delayed for South Barrie employment lands, site visits in March 2024 reveal that there are properties in the area of McKay Road and Highway 400 that are currently being marketed for industrial development. There is no doubt that the area can serviced well within the planning period. Moreover, while not necessarily needed ahead of development of the South Barrie lands, the interchange at McKay Road and Highway 400, which is planned for commencement of construction in 2034, will further enhance the attractiveness of this area

<sup>&</sup>lt;sup>2</sup> "South-end Barrie land poised for huge development once home to International Plowing Match", *Innisfil Today*, July 30, 2021.



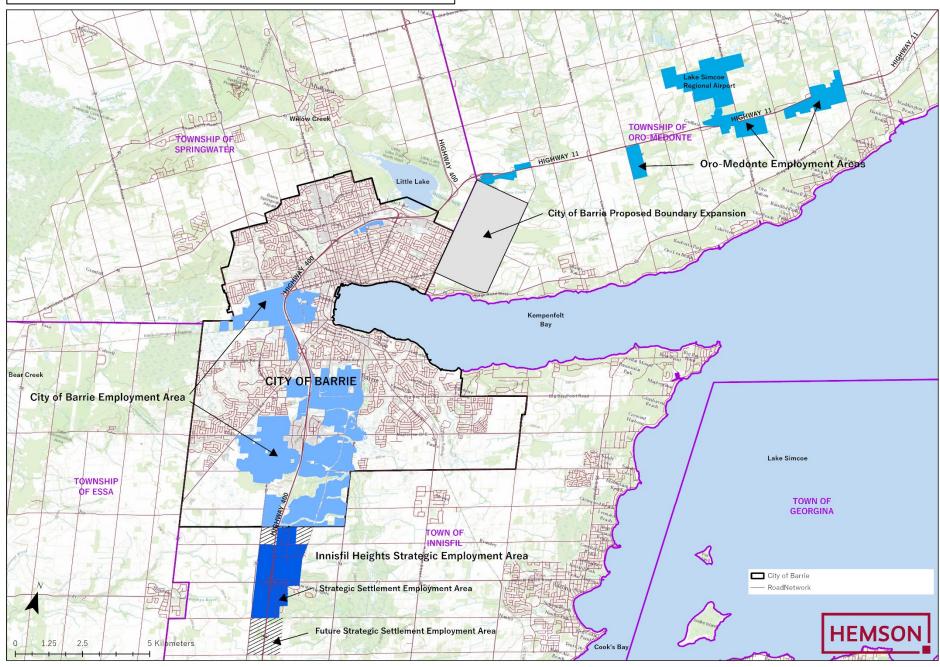
- as a major employment hub, providing an enhanced level of access to major transportation corridors to the south.
- Immediately to the south of Barrie along Highway 400 is the Innisfil Heights Strategic Settlement Employment Area (see Map 3). This area is an existing and developing employment area identified as a Strategic Settlement Employment Area in the Provincial Growth Plan. This designation signals the Province's assessment of this area as a strategic site for economic growth. The Growth Plan defines Strategic Settlement Employment Areas as areas "...that are to be planned and protected for employment uses that require large lots of land and depend upon efficient movement of goods and access to Highway 400." The Innisfil Heights employment lands compliment the South Barrie employment lands; together they provide a broad range of market choice for employment land users requiring good access to suppliers and markets in the Greater Toronto Area and beyond. Also, further south on Highway 400, centred at County Road 88 is the Bradford West Gwillimbury Strategic Settlement Employment Area as identified by the Growth Plan, further reinforcing the Province's view of the strategic importance of this corridor for employment uses.

#### In summary:

- Barrie's long-term employment land supply is generally sufficient to meet forecast Employment Area employment to 2051. Barrie also has sufficient serviced supply (276 hectares as of 2018) to meet short-term needs. Additional supply to accommodate long-term vacancy and parcel choice in the market is provide by reviewing the land supply at least every 10 years while extending the planning horizon out another 10 years.
- Although there is some uncertainty as to the exact timing of servicing of all of the South Barrie lands, Council has expressed its intent, through master plans and development charge studies, to extend full services prior to 2041 and possibly as early as the next 5-10 years;
- There is a clear Provincial interest, through the designation of Innisfil Heights and the Bradford employment lands in the Growth Plan as Strategic Settlement Employment Areas, the construction of Highway 413 and the Bradford By-Pass, and the ongoing construction of Highway 400 interchanges (including one slated for the South Barrie employment lands) to support major industrial development along the Highway 400 corridor between Barrie and the Greater Toronto Area.



**Map 3**– **Employment Areas in Barrie and Nearby Areas** 



# C. REVIEW OF SUITABILITY OF BOUNDARY ADJUSTMENT LANDS IN ORO-MEDONTE FOR EMPLOYMENT AREA USES

A recent proposal has stated that a boundary adjustment involving lands in Oro-Medonte to the immediate northeast of Barrie is needed to address the City's employment land needs. A boundary adjustment area comprising approximately 772 gross hectares has been identified as shown in Map 4 (the "boundary adjustment lands").

In providing a rationale and preliminary details regarding the boundary adjustment proposal, it has been stated that:

- Barrie has a very limited supply of developable industrial lands with water and wastewater servicing. As such, the City needs additional vacant serviced industrial lands beyond its municipal boundary.
- Barrie is well-positioned to undertake water, wastewater and transportation infrastructure improvements for the boundary adjustment area.

#### i. Assessment of Proposed Oro-Medonte Boundary Adjustment Lands

As reported in the Township of Oro-Medonte's February 14, 2024 staff report,<sup>3</sup> the proposed boundary adjustment lands consist of actively farmed agricultural lands, classified as prime agricultural area in the Township's Official Plan. Approximately 40 percent of the lands have a Greenlands designation with the remainder or the area split between agricultural and rural designations. There are also areas covered by watercourses regulated by the Nottawasaga Valley Conservation Authority as well as identified floodplains. The southwest quadrant of the boundary adjustment lands is subject to a Policy 2.6.11 in the Township Official Plan which provides agricultural policies for areas adjacent to urban development in neighbouring municipalities. A small area (approximately 5 hectares) at the northern edge of the boundary adjustment lands is designated for employment uses as part of the Township's designated Employment Areas along Highway 11 and is occupied by the Napoleon Logistics Centre.

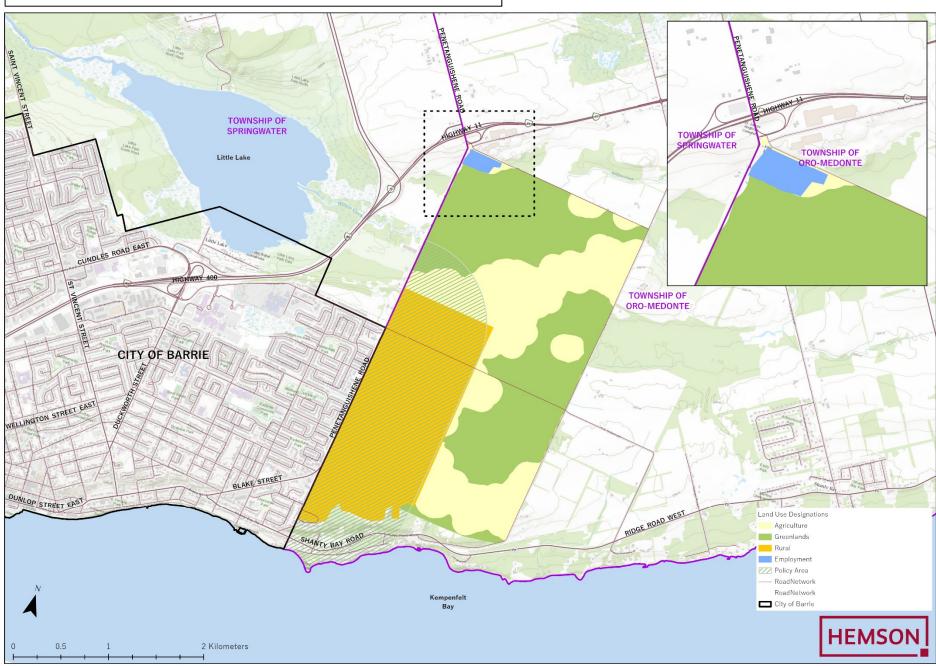
Other existing uses include a winery, with associated event centre, and a place of worship.

<sup>&</sup>lt;sup>3</sup> Township of Oro-Medonte Report No. DS2024-017, February 14, 2024, City of Barrie Proposed Boundary Expansion.



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**Map 4 – Proposed Oro-Medonte Boundary Adjustment Lands** 



In terms of surrounding lands uses:

- immediately to the west is an established residential area in the City of Barrie on the west side of Penetanguishene Road;
- residential waterfront development is located to the south;
- one of the Township's designated Employment Areas is located to the northwest; and
- other rural and agricultural uses are to the north and east, including a golf course.

The proposed boundary adjustment lands are not located close to any of Barrie's existing major Employment Areas, which are concentrated in the southern and central part of the City.

Development of the boundary adjustment lands for employment uses would result in an increase in truck traffic through the City to the south, the direction of travel for most goods traffic in Barrie and southern Simcoe County. Given the location and configuration of the boundary adjustment lands, the vast majority of truck traffic to and from the area would be through the existing highway interchange at Penetanguishene Road and Highway 11 to the northwest of the boundary adjustment lands and potentially also through a limited access point to Highway 11 at Line 1S. Highway 11 connects with Highway 400 just to the west of the boundary adjustment lands. Potentially significant improvements would likely be required to the interchanges if the area were to develop for a large Employment Area because of the sharp turning circle of the highway off ramps, the T-junction where the ramps meet Penetanguishene Road, the presence of a church and cemetery adjoining the T-junction, and the presence of a road tunnel for Penetanguishene Road under the highway at this location.

While the topography of the proposed boundary adjustment lands is relatively level with some modest rolling hills, as stated above a large share of the identified lands would be undevelopable, about 40% of the total area.

Like any rural land proposed for urban development, there is currently no municipal water or wastewater servicing available and roads are at a rural level of service and would require upgrading for urban type uses and heavy truck traffic.

## ii. Oro-Medonte Already has Designated Employment Areas near the Boundary Adjustment Lands

The Township has a number of designated employment land areas along Highway 11, including the area near the airport which is identified in the Growth Plan as the Lake Simcoe Regional Airport Economic Employment District. From a site selection perspective, airports,



even small regional facilities, can provide advantages for employment land users that can make use of the transportation infrastructure. Oro-Medonte's Employment Areas permit a wide scope of industrial type uses including manufacturing, warehousing and distribution, research and development facilities, transportation terminals and other uses, allowing for a broad range of economic activities.

There are two major industrial projects located near the airport: an automotive-related business park and motorsport club under development comprising 500,000 square feet of industrial space related to automotive research, engineering and development and a proposed medical innovation park. Both of these developments were subject to Minister's Zoning Orders. The Township's February 14, 2024 staff report states that there are more than 859 hectares of employment lands designated along the Highway 11 corridor in Oro-Medonte. All of the Township's Employment Areas are on private services.

In terms of other municipalities adjacent to Barrie, the Township of Springwater has scattered small industrial and business industrial designated areas, some located near Barrie; similarly, Essa has a limited number of small designated industrial areas which are not located near Barrie boundary.

In short, there are substantial Employment Areas already designated along the Highway 11 corridor north of Barrie that, with or without municipal services, are suitable for a range of employment activity.

## iii. Potential Impact on Employment Areas Associated with Proposed Provincial Planning Statement

Under the current Growth Plan, conversion of lands within Employment Areas to nonemployment uses is only permitted through an MCR, and subject to a number of criteria including: demonstrating need for the conversion; maintaining sufficient employment lands to accommodate forecast employment; not adversely affecting the overall viability of the Employment Area; and ensuring sufficient existing infrastructure and services.

In April 2023, the Province released the draft proposed Provincial Planning Statement that is intended to replace the Growth Plan and PPS with an integrated policy statement. A revised proposed Provincial Planning Statement was posted on the Environmental Registry for comment in April 2024. Although not yet in force, the draft statement indicates the policy direction of the Province with respect to land use planning matters. Under the new PPS, removal of lands from Employment Areas can be considered at any time. The draft criteria speak to demonstrating an identified need for conversion, demonstrating that the proposed use would not negatively affect the overall viability of the Employment Area, existing or



planned infrastructure and public service facilities can accommodate the proposed uses and the municipality has sufficient employment lands to accommodate projected employment growth. While most of the criteria are similar to the current PPS and Growth Plan, the lack of a requirement to undertake this analysis as part of a MCR weakens the Provincial policy requirements around conversions.

If implemented as proposed, the new policies will make it easier to undertake conversions of lands in Employment Areas for non-employment uses. This potential impact will be felt across all Ontario municipalities and is not unique to Barrie or Simcoe County. It is difficult to speculate at this point to what extent Barrie and other municipalities will be subject to increased employment land conversion applications. The change in policy will likely result in additional risk of conversions and a weakening of the ability to protect Employment Areas from conversion. Municipalities will need to undertake frequent and regular monitoring of employment land supply and associated impacts of conversions to their existing Employment Areas. The City of Barrie has conversion policies and criteria in its current Official Plan which it may choose to retain, even with the new PPS in place.

#### iv. Comparison of Boundary Adjustment Lands and South Barrie

As an additional perspective on evaluating the proposed Oro-Medonte boundary adjustment lands as a potential location for Employment Area uses, the following table compares the merits of the boundary adjustment lands with the South Barrie employment lands using a range of criteria related to typical site selection for employment land users.

Table 3: Comparison of Site Selection Factors for Employment Land Users

Factor	Proposed Oro-Medonte Boundary Adjustment Lands	South Barrie Employment Lands
Access to labour – within Barrie and across	<b>√</b>	1
Simcoe County	<b>V</b>	<b>V</b>
Proximity to other established Employment		
Areas – supplier links		V
Does the location complement planned		
employment uses nearby?		V
Proximity to a strategic economic		1
Employment Area		V
Does the location serve businesses in a	,	
rural area, benefitting from	$\checkmark$	
separation/distance from urban lands		
Direct/proximate access to Highway 400		✓



Factor	Proposed Oro-Medonte Boundary Adjustment Lands	South Barrie Employment Lands
Visibility on arterial highways		✓
Accessibility to transportation infrastructure such as rail lines or an airport	✓	
Area large enough to provide opportunities for significant contiguous blocks of land	✓	✓
Area can accommodate land-extensive users	✓	✓
Existing uses that can be leveraged for spin-off impacts		✓
Lack of physical features that could preclude/inhibit development		✓
Can land use conflicts be managed/avoided		✓
Location conducive to attracting target employment sectors		✓

Source: Criteria developed from Cushman and Wakefield, Decision-Making Factors – from Economic Strategy – Real Estate Market and Site Selection Perspectives, prepared for the County of Simcoe, March 2022

The above high-level assessment illustrates the superiority of the South Barrie employment lands from a site selection perspective and highlights the multiple weaknesses of the Oro-Medonte boundary adjustment lands as a location for employment land users that would exist, even if the lands become urbanized.

#### D. CONCLUSIONS

It has been proposed that the City of Barrie's urban boundary should be adjusted to include lands in the Township of Oro-Medonte, northeast of Barrie, to address the need for additional employment lands. In our view, this proposal does not have merit on land use planning or land economics grounds for the following reasons:

The City's LNA, completed as part of its MCR, determined long term employment land needs to 2051. The additional employment lands that were added to the City's urban area in South Barrie as part of this process are well-located adjacent to existing Employment Areas in Barrie and Innisfil with good access to Highway 400. Review of the City's LNA reports do not reveal any major errors or omissions that would result in the need to for further additional Employment Area land supply to meet forecast employment growth. In addition, a preliminary updated estimate of Barrie's current employment land supply did not reveal the need to consider additional employment lands outside of the City's boundary.



- The City has the ability to monitor the demand and take-up of its existing designated employment land supply and address any potential shortfall issues that may arise in the next MCR. It also has a plan to extend full municipal services to all of its Employment Areas before 2041. There is no need to consider adjusting the City's boundary for additional lands for employment uses in the interim.
- The proposed boundary adjustment lands in Oro-Medonte are not well suited for employment uses given their distance from existing and developing Employment Areas in the south, and the adjacent residential area to the west. In addition, a large share of the boundary adjustment lands are undevelopable being within floodplain areas and/or under greenlands land use designation. Potentially significant capital costs may be required to extend water and wastewater services, and reconfigure roadways and intersections to develop the area for employment uses.
- The Township of Oro-Medonte already has an abundant supply of designated
   Employment Areas along Highway 11 that could accommodate employment land demand in this part of Simcoe County.

