Davies Howe
LAND DEVELOPMENT ADVOCACY & LITIGATION

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October 30, 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

We are writing to provide further comments regarding the Barrie Annexation proposal which is scheduled to be considered by Council on November 5, 2025.

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

The Group structure provides for the addition of new members to connect to and benefit from existing and planned servicing infrastructure in Midhurst.

The Group is Committed to the County and Springwater

To date, collectively, the Group has invested:

- $100's of millions in land acquisitions and development approvals; and,
- $100 million in external infrastructure, including a new state-of-the-art wastewater treatment plant, two new water treatment plants, new forcemains, and road improvements.

Currently, the Group is funding a $95 million expansion to the wastewater treatment plant, which includes $35 million in provincial housing-enabling water system (HEWS) funding, secured by the Township working in collaboration with the Group.

The new water and wastewater treatment facilities in Midhurst are built and are being operated by the Township and will be further expanded as required to service additional development.

The existing water and wastewater facilities are operated by the Township through their operating agreement with the Ontario Clean Water Agency. All households connected to these facilities are billed by the Township for these municipal water and wastewater services.

An additional $175 million has been invested by the Group in local sewers, stormwater management facilities and community parks.

Recently, members of the Group hosted a community event celebrating the grand opening of the Adam Elliott Park in Midhurst, an eight-acre master planned park and trails that connect into the County of Simcoe trail system.

To date, the Group has invested over $500 million and remains committed to continuing to work with Springwater and the County on the continued delivery of a variety of homes, recreational amenities, jobs and growing economic and social benefits for the community.

In addition, individual members of the Group have generated billions of dollars of investment in the County of Simcoe, including Highway 400 Employment Lands in Bradford West Gwillimbury, and Friday Harbour Resort Community in Innisfil, further reinforcing the Group's local commitment.

Submissions on the Proposed Boundary Adjustment Framework

This year, the Group has made numerous submissions, including on servicing matters as set out in Appendix A. Taken together these submissions demonstrate the Group's seriousness and willingness to service additional lands, including the Bayfield Street Corridor.

Servicing allocation for the Remington/Sadlon lands can be available and construction of linear infrastructure completed by 2028, as noted in the MLG 'Made in Springwater' presentation dated August 11, 2025 which was appended to our letter of September 22, 2025. If linear infrastructure is constructed to service Remington/Sadlon lands, the Group anticipates that the rest of the Bayfield Corridor north of Remington/Sadlon will be development-ready, generating significant economic and social benefits for the Township and County. These economic benefits are outlined in submissions made by Keleher Planning and Economic Consultants, dated May 12, June 2, and June 25, 2025.

Springwater's vision for the Bayfield Street corridor includes:

- Almost a half million square feet of new main street commercial uses - grocery stores, coffee shops, and other retail and professional services; and

- 1,800 units of more affordable medium density housing.

Cross-border servicing from Barrie will not help to deliver this vision and will strand the benefits that come with it.

As you deliberate on Barrie's proposed Boundary Adjustment Framework, we would ask that you consider the following three additional points:

1. Watershed Servicing

Firstly, the Springwater annexation lands are situated in the NVCA watershed. If Barrie services the lands, servicing will be done via the Lake Simcoe watershed. We have not seen any evidence considering the impacts, nor how the requirements of the Lake Simcoe Protection Plan will be met. Servicing the lands via Springwater maintains servicing and the lands in the same watershed.

2. Optimizing Public Infrastructure

Secondly, the Group, together with the Township, the County and the Province have made significant investments of time, money and resources in planning, financing and delivering the Midhurst infrastructure. This infrastructure has the potential to service regional needs in collaboration with the Township and County and its optimization in that regard should be pursued.

3. Regional Market Area

Thirdly, Barrie, Springwater and Oro-Medonte function as part of the same regional market area. There are regional market areas throughout southern Ontario that have grown and evolved and found win-win solutions for the greater good without shifting boundaries and taking lands from one another. As demonstrated, it is possible to accommodate future growth needs of the regional market area without a boundary adjustment.

Growth in this regional market aera is inevitable. The Group believes the growth can be achieved without costly and disruptive annexations, while the County and Springwater retain control over the nature of the growth and, the benefits of that growth are enjoyed by the residents of Springwater and the County.

For all of these reasons, Mayor Coughlin, Deputy Mayor Cabral and Members of Council, we would ask that Springwater Council not support the Boundary Adjustment Framework proposed by Barrie.

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
Clerk's Office, Springwater
Renee Ainsworth, 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 Landowners Group, c/o Daniel Steinberg, Trustee

Appendix A

Chronology

February 5, 2025	Springwater Council **UNANIMOUSLY PASSES** Resolution to
February 19, 2025	MLG Issues Letter to Township of Springwater re: Support for February 5, 2025 Resolution
May 15, 2025	MLG Issues Technical Submission to Township of Springwater
June 2, 2025	MLG Issues Subsequent Technical Submission to Township of Springwater re: Growth Management Presentation
June 13, 2025	MLG Issues Letter to Township of Springwater re: Growth Management Presentation
June 19, 2025	Geranium Issues Letter to OPLDF re: MLG infrastructure and Bayfield Street Corridor
July 2, 2025	MLG Makes Presentation to Township of Springwater Council
July 15, 2025	MLG Issues Reponses to Township Peer Review Comments
July 16, 2025	Geranium Issues Summary of KPEC Memo to OPLDF
July 25, 2025	MLG Issues Minutes from Meeting with the Township of Springwater held July 22
August 11, 2025	MLG Issues Made in Springwater Servicing Presentation
August 22, 2025	MLG Issues Minutes from Meeting with the Township of Springwater held July 22
August 22, 2025	MLG Issues Email re: Servicing Costs of Bayfield Corridor
September 22, 2025	Davies Howe Issues Submission on behalf of MLG re: Opinion on Annexation Proposal
October 6, 2025	Davies Howe Issues Submission re: RV Anderson Engineering Analysis

October 6, 2025	Davies Howe Issues Legal Opinion re: Strong Mayor Powers
October 10, 2025	Davies Howe Issues Legal Opinion re: Annexation Proposal
October 20, 2025	Davies Howe Issues Response to Aird & Berlis Opinion re: Strong Mayor Powers