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August 13, 2025

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Township of Springwater
c/o Clerk's Department
2231 Nursery Road
Minesing, Ontario
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Attention: Mayor and Members of Council

Re: 2252841 Ontario Inc. (Paul Sadlon) and MZO-2023-002

We act for 2252841 Ontario Inc. (Paul Sadlon) and have now had an opportunity to more fully review and consider the Notice of Motion listed as item 13.1 on Council's July 2nd agenda, and related materials, whereby Council voted to revoke support of a Minister's Zoning Order relating to development of our client's lands ("MZO-2023-002") unless the development is serviced through the Midhurst water and wastewater treatment facilities.

At this meeting, and prior to Council's resolution to revoke support, the Township had, among other things, two deputations, each from consultants retained by the Township, which urged Council to proceed under an abundance of caution in relation to a proposed expansion to the Midhurst water and wastewater plant, suggested by the Midhurst Landowners Group ("MLG").

Joe Mullan, P. Eng, President and CEO of Ainley Group, provided comments on his Peer Review of the MLG materials related to Water and Wastewater Servicing of an Expanded Midhurst Secondary Plan ("MSP"). Mr. Mullan urges caution in accepting optimistic servicing and capacity estimates without further technical validation and hydrogeological assessments. He indicated that significant additional infrastructure and policy work is required to reliably service the MSP expansion, especially for employment lands and the Bayfield corridor. The current MLG proposal does not contemplate providing full municipal services to the employment expansion area which, in his opinion, would eliminate all possibilities of creating a sustainable employment area similar to New Tecumseth and Collingwood.

Council was advised that the true costs are substantially higher than the preliminary figures provided in the MLG materials, and operational risks must be carefully managed to avoid regulatory issues. It was stated that the maximum capacity of an expanded plant is unknown, and that the MLG flow rates significantly underestimate requirements for the expanded MSP lands.

Mr. Mullan also noted that the tendered wastewater facility cannot be awarded due to budget limits and that the MLG is asking to reduce the scope of the facility to $80-90 million, which has not yet been accepted by the Township. The construction of this plant does not consider any expansion of the MSP. In relation to servicing the Bayfield Street corridor, it is estimated that upwards of $100 million would be required to service this corridor. He also noted that no engineering design analysis has been completed.

Daryl Abbs from Watson and Associates Economists Ltd. provided a presentation on the Fiscal Impacts of the Barrie Boundary Adjustment. Mr. Abbs outlined financial modeling using standard municipal finance assumptions. Under the development scenario of residential and non-residential land, his findings conclude that there will be a combined deficit of $7-8 million per year based on the current tax rates.

Developing the proposed expansion lands could generate substantial tax revenue but is projected to create a net budget deficit under current conditions, primarily due to low industrial tax rates and high infrastructure costs. Adjustments to tax policy and thorough, service-inclusive analyses are recommended for future decision-making.

Upon Council rendering its decision to revoke support for MZO-2023-002, the City of Barrie released correspondence regarding this matter. In a letter dated July 14th, 2025, Barrie confirms that, if the Township of Springwater chooses not to support development of our client's property and other lands in the vicinity, it is their position that those impacted landowners should be given the opportunity to grow under a jurisdiction that is willing and able to support them. The City of Barrie is prepared to support the current MZO requests by expanding the Barrie municipal boundary to include these lands and provide servicing to allow them to proceed.

In further correspondence from the City of Barrie, dated July 17, 2025, the City of Barrie has confirmed that they possess a current capacity to extend municipal water and wastewater services along the Bayfield corridor to support an equivalent population of 7,200 to 8,600 people which, in their opinion, is more than sufficient to support the expansion area. It is their estimation that a 3-year process will be required for design and construction of the necessary infrastructure.

As stated in previous correspondence submitted on behalf of our client, dated June 24, 2025, our client's interest is to align with the most economical and timely service connection to facilitate construction. Our client's position from June 24, 2025 remains unchanged; it is clear that the City of Barrie can provide the most timely and cost-effective path forward.

Indeed, it is our client's position that it is clear from the evidence and from Council's revocation of its support for MZO-2023-002 that servicing and development under the auspices of the City of Barrie is the only option, and there is no other 'made in Springwater' solution that is financially viable and will ensure timely and cost-effective development of our client's property and other lands in the vicinity. In the circumstances, our client has no alternative but to request that the Province consider moving our client's parcel into the jurisdiction of the City of Barrie.

From a Provincial perspective, timely and cost-effective development of lands such as our client's lands that are ready to be developed is a shared responsibility which should prioritize the creation

of appropriate housing, employment and community-building opportunities. This should not be obstructed on lands that are otherwise ready for development by decisions that would make development subject to more cost and risk and extend the timeline in which it can be delivered.

Our client is committed to contributing to the Province's housing goals and is confident that the City of Barrie will allow the much-needed and highly desirable development of our client's lands to move forward with certainty and without delay.

Yours truly,

FASKEN MARTINEAU DuMOULIN LLP

[redacted]

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