



Bruce County – Land Use Service Delivery Review Final Report and Recommendations

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1: Introduction

Bruce County is currently reviewing its Official Plan, a guiding document that establishes how communities will grow and develop over time through a series of directions for land use and community planning.

In preparation for this review, Bruce County initiated the Bruce GPS community engagement work which established a vision and eight guiding principles for the future of Bruce County.

In March 2020, the County was awarded funding through the province's Municipal Modernization Program to hire a consultant to conduct a Land Use Service Delivery Review (Land Use SDR). The Land Use SDR is intended to support the Official Plan update with recommendations on innovative land use policies that would enable the eight guiding principles established by the Bruce GPS work.

This review was intended to begin in May, however the onset of the COVID-19 pandemic resulted in a delay that pushed the project start to the beginning of June.

StrategyCorp was retained in June 2020 to undertake the Land Use SDR.

On June 9, StrategyCorp convened a kick-off meeting with representatives from the County to agree on a project management structure, to conduct a document request, and to create a new timeline to account for the delay caused by the pandemic.

Throughout July and August, StrategyCorp conducted stakeholder interviews to gather feedback on the current strengths, weaknesses, and opportunities within the current Official Plan. Each interview was followed up with an evaluation survey to gather any additional insights from stakeholders.

On August 11, StrategyCorp delivered an interim *Consultation Summary Report* that included a detailed overview of feedback received through stakeholder consultations.

We assessed the themes that emerged from the consultations and reviewed them, having regard to:

- Emerging best practices across Ontario,
- Policies employed in comparator municipalities, and by
- Applying experience from our consulting team.

StrategyCorp would like to recognize all those who participated in the interview process for their contribution to the recommendations in this the Report.

1.1 Context

Managing growth in a two-tier system: Bruce County is in the optimal position to take a leadership role in the growth management of the County, by acting as managers of regional growth patterns, economic development, and the deployment of regional infrastructure.

The County can manage the regional urban envelope and relationships between the defined urban areas, rural and agricultural landscapes, and the regional natural systems. This approach would involve increased collaboration on growth management goals, and implementation with local municipalities.

The changing role of County Government: Over time, the nature and expectations of county governments have shifted from a layer of regulations and policy, to an underlying expectation that they play a key role in the coordination and facilitation amongst the local municipalities.

Increasingly Bruce County has a role and responsibility to facilitate the wellbeing of planning services across the County as a whole, with the expectation of creating a framework to manage local growth and development, with the local municipalities acting as implementers.

Uneven Growth Pressure: Residential and employment growth is steadily increasing in the communities of Bruce County. The Bruce Power facility has been a prime economic engine historically and ongoing refurbishment of the facility is driving renewed growth within a number of nearby communities. Other key drivers include seasonal tourism within shoreline communities and agricultural production further inland. This growth, however, does not manifest itself uniformly across the County. Varying degrees of growth, as well as expectations for managing that growth, are being felt by each local municipality in separate and distinct ways.

A Plan Created in 1997: Bruce County's Official Plan was created in 1997 and last updated in 2010 and reflects norms and "on the ground" realities that were common at the time it was created.

Changing growth pressures, new provincial policies, and new policy priorities make it very appropriate to update the plan to reflect up to date thinking on:

- Complete communities
- Housing affordability
- Effective and efficient networks for transportation, transit, and active transportation;
- Climate change
- Indigenous Peoples' Consultation

An update to the Official Plan represents an opportunity for Bruce County to put in place a document that will create a framework for planning innovation for future generations.

2: Consultation Report

2.1 Methodology

As part of the Land Use SDR, StrategyCorp undertook a stakeholder engagement process to ensure County staff, the County's partners, and local industry leaders were consulted before the development of this Final Report.

Throughout July and into August, StrategyCorp conducted stakeholder interviews and focus groups with participants identified in collaboration with Bruce County. These included:

- Bruce County staff,
- CAOs and several senior managers of local municipalities,
- Conservation Authority staff members, and
- The development community.

Representatives from local Indigenous communities were contacted by the County and invited to participate in the interview process but were unable to connect due to unavoidable circumstances. They have been assured by the County that they are welcome to provide their input directly at a time that is convenient for them.

The interviews were structured to gain insights and perspectives on the current land use planning policies within the Official Plan,

- How they translate into real life application,
- How they could be improved, and
- How success in improvement could or should be measured.

The questions posed to stakeholders were based on the eight guiding principles of the Bruce GPS and focused on how respondents see the current Official Plan policies effectiveness in achieving the County's goals.

All insights gained from the interviews have been considered and incorporated into the development of the recommendations in this report. We have included a summary of the feedback we received in our conversations below.

2.2 Summary of Stakeholder Interviews

We heard a lot of positives: While speaking with stakeholders, most used the opportunity to highlight elements of the County-Local Municipality Framework that are working well. Many commented on the professionalism and knowledge of County staff, particularly the planning staff, and had generally positive things to say about their work and the services they provide.

Respondents were eager to discuss the County's Official Plan, how it fits into the broader conversation about the future of Bruce County, and how it relates to and works with local decision-making.

Overall perspectives on collaboration within the County: There is general excitement at the future of the County and interest in collaboration among local municipalities. At the same time, there is a range of opinion among the local municipalities, and it is fair to say that each local municipality has its own vision for growth.

- Some want more autonomy than others, and
- Given the different states of each local municipality, and different prospects for change, a “one size fits all” approach for managing land use change would not be appropriate.

They look to the County to provide support, flexibility, and innovation.

Some challenges need to be addressed: While feedback was generally positive, some challenges were identified.

There is consensus that the Existing Official Plan is out of date: There is a shared view that this Review is timely, and general agreement that the Plan, first passed in 1997 and revised in 2010, is showing its age and is in need of a rethink. Stakeholders are enthusiastic about the upcoming Official Plan Review and consider it an opportunity to implement innovative thinking and policy direction that positions Bruce County as a leader among comparator municipalities.

There is a need for better awareness of the financial implications of growth: Another theme raised by several respondents was the need for better awareness among decision-makers and the public of the trade-offs of growth. The most frequently example cited was the need for stronger analytical tools to inform the ongoing debate over the financial impacts of growth:

- Does growth bring net financial benefits to the municipality by contributing to the property tax assessment base and other economic activity to the community, or
- Does growth impose net financial costs on the municipality by exposing it to capital and operational servicing costs that exceed property tax or growth-related fees, such as development charges.

Local issues raised that fall outside the scope of this study: The interviews also identified issues and opportunities that were found to be out of scope of this study – most frequently, issues that pertain to local zoning by-laws or local Official Plans.

Out of date zoning bylaws and local official plans were identified by private sector stakeholders as major impediments to orderly and logical development in the County. It was reported that in some cases good, developable land was being passed over because a developer did not want to engage in a cumbersome process of official plan amendment.

Role and responsibility confusion between County and local municipalities: In many cases interviewees either:

- Identified local issues that they thought related to the county plan, or
- Were uncertain which level the issue related to.

In either case, it makes the point that two tiers of planning can cause confusion about “who does what” in planning, and the new Official Plan should contribute to clarity.

2.2.1 To put growth in the right locations with the right services

Stakeholders agree that it is important to protect agricultural lands. During our discussions, stakeholders commended the current OP's policies that ensure development only takes place in areas with proper water and sewer infrastructure and protects the over development of valuable agricultural land.

- *“The Current Official Plan is effective at mitigating unwarranted development on agricultural lands and un-serviced areas.”*

Many express the view that current mechanisms would benefit from being modernized. Many expressed concern that existing policies can sometimes restrict the development that they would consider desirable. Frequently cited were low-density housing on private services that respondents believed would attract new residents and economic investment to their community.

Need for more customization of policy to suit different local conditions. Respondents also noted that the County Official Plan applies common policies to areas that are experiencing very different market conditions related to growth and change.

- *“There are high-growth, low-growth and no-growth communities. We need appropriate policies to properly manage each kind, and the current OP does not really reflect that.”*

The current plan lacks relevant primary and secondary settlement areas – where the majority of growth is going. Stakeholders from the private sector, local municipality, and even County government who typically work in Bruce's larger urban communities often said they were unaware of the County's Official Plan policies or what application they may have to their work. Most suggested that there is space for the County to lead on elements of their work, particularly around housing affordability, cultural heritage, and transportation planning.

We heard the view that the rural focus of the Official Plan leaves content gaps relating to urban areas, and it does not direct growth to appropriate land within primary and most secondary settlement areas.

Areas experiencing slower rates of change want more flexibility to get what they can. Responses from officials in less urban local municipalities tended to suggest that lot creation, agricultural protection, and settlement area expansion policies were too restrictive and did not allow them to meet demand for specialized housing products.

- *“I wish the [fast-growing] Bruce communities would share the wealth a little. It would be great if we could get some of the population growth they're getting directed over here.”*

2.2.2 To increase the supply and mix of homes

Some positive comments related to the rural areas: Stakeholders expressed opinions that current OP does a moderately good job of ensuring an increased supply of diverse housing options though this is limited to the rural areas where its policies apply.

The 2010 Review was on the right track: We were told that the last major update of the County's housing policies was effective in boosting densities and bringing more townhomes and apartments to the market, despite being a challenge.

New policies needed to continue the progress: This review is an opportunity to bring innovative thinking forward to enhance the way the County and local municipalities approach housing. Some respondents commented that the policies around housing specifically relating to lower tier municipalities could be more detailed while remaining flexible to ensure there is room for interpretation depending on the needs of the municipality. For example, stakeholders cautioned that density requirements do not always match the area's growth characteristics and, in some cases, strict severance policies can get in the way of reasonable development.

More diversity in housing options: When it comes to the future of Bruce County, stakeholders identified the opportunity for more diversity in housing and suggested exploring official plan policies that would encourage the development of secondary suites, affordable units, and tiny homes as options to support a range of residential needs.

Local municipalities are eager to expand their housing options and are looking to the County for guidance and suggested best practices to help them build what makes sense in their communities. Several stakeholders pointed out the need for more of a focus on diversifying the County's housing supply and stressed that a diversity of options are necessary to support seasonal workers and residents at all income levels.

Affordable housing is a particular need: A particular concern raised by almost all stakeholders interviewed was a desire for the County to lead on facilitating the development of affordable housing.

- *"I would love it if the County gave me a template for how to implement local secondary suite policies ... and how to get more affordable rental units on the market for the service workers in our community."*
- *"Local municipalities are interested in learning about how they can develop more diverse and attainable housing. There has been a shift in interests from building larger homes to smaller, more affordable options."*

2.2.3 To support our key economies, including supporting a thriving agricultural community

Targeted updates to build on strength. Bruce County has strong policies that protect its agricultural lands, but stakeholders identified that the agricultural industry in Bruce County is evolving and the Official Plan has not caught up with these changes.

- *“The Official Plan has strong supports for our tourism and energy sectors but more can be done to help our farmers initiate new types of farm operations.”*

Suggestions for improvement were focused in two areas:

Flexibility to allow for new farming realities: The current Official Plan is seen as not sufficiently permissive of new agri-food business opportunities.

According to respondents, the top improvement to be made in the Official Plan is that the on-farm diversified uses allowed in other Counties should be explicitly permitted in Bruce. These concerns were heard many times and appears to be top of mind for many local municipal stakeholders.

More Flexibility in Severances: Many respondents commented that the OP does not permit the creation of new lots that would attract development, particularly low-density development in rural areas. The plan is seen as setting the bar too high for OP-conforming land severances.

- *“The agricultural planning process is too uncoordinated here... land is not severed properly and it is often not severed in the right places.”*

One particularly concerned respondent conceded that while severance policies on agricultural and rural lands reflect provincial policy, the historic parcel fabric of the County, and possibly what was permitted in neighbouring counties, he would like to see the County use the official plan update as a way of “challenging” the province on these matters.

For a detailed discussion of the OP as it relates to agriculture, see section 3.2.

2.2.4 To create opportunities for a diversity of businesses, jobs, and employers

Stakeholders recognize the challenge in creating policies that support economic development when markets and economies are constantly in flux, and future needs and changes are difficult to predict. However, many respondents expressed the view that the current Official Plan is showing its age and should be updated to reflect the reality of today's business landscape in the County.

Promoting “year-round” economic activity:

Stakeholders pretty much agree that Bruce County is a beautiful part of the province all year long, but that too much of its economic activity is seasonal in nature. To go to the next level of economic sustainability, Bruce County needs economic development policies that encourage (or at least that do not discourage) year-round economic activity.

- *“Bruce County is well positioned to grow its year-round economic development and attract more entrepreneurs especially as more people are working from home.”*
- *“We’ll know the updated official plan is working when we see year-round economic activity – right now we’re very seasonal.”*

Re-thinking the role of Bruce County in the post-COVID-19 economy. COVID-19 has rapidly accelerated the reality of the virtual workplace and enabled knowledge workers a degree of freedom in location decisions that was unimaginable only six months ago. Provided that investments in digital and cellular access keep pace with the needs of business users, Bruce has a whole new set of options to attract residents who no longer have to be within commuting distance of GTA office locations.

- *“Maybe we should encourage people to do their “work from home” up here instead of in the GTA suburbs.”*

Updated policies to continue support for traditional areas of strength: There is also an interest from more rural municipalities to explore ways to attract industry and bring more job opportunities to their municipalities. One respondent suggested a robust County active transit network would bring more tourism to their community from the coast – as cyclists, cross-country skiers, snowmobilers, and hikers explore further inland this would create new opportunities for recreational accommodations, cafes and restaurants, and retail.

Tourism: While the Official Plan is seen to support the tourism sector broadly, some stakeholders expressed the need for tourism to be more explicitly addressed in the document. Several also suggested that some tourism-enabling infrastructure may be reaching its capacity, most notably the county road network. The pandemic has been cited as an opportunity for the County to establish creative and innovative ways to approach tourism in a COVID-19 environment.

Energy: Stakeholders agree the County has a strong energy sector, but less is known about the actual Official Plan policies that support it. Questions were raised about what can be done to further strengthen and diversify the County's energy sector across municipalities.

Agriculture: Comments were also made about economic development as it relates to agri-food, as reported in section 2.2.3 (above).

2.2.5 To improve our ability to move people, goods, and information between communities

New priorities: The consensus among stakeholders is that the new Official Plan should encourage connectivity between communities, provide opportunities and conditions for more transit options within communities, and put a new focus on active transportation. Stakeholders call for policies that encourage creative ways to move people throughout the County including integrated bike lanes, walkable communities, and a public transit system.

- *“Bruce County has a great road network at the County and local levels. Smaller municipalities are looking to the County for support in developing sustainable transportation methods.”*
- *“The demand for increased mobility is high but increasing mobility doesn’t necessarily mean widening highways. We need coordination between the County and local municipalities to build an integrated system that explores other transportation methods.”*

Stronger linkages between development decisions and transportation planning: Stakeholders also cautioned that more attention needs to be paid to transportation planning during the development process. Rapid development in some areas is causing congestion and stress on roadways which is exacerbated during tourist season, so some respondents suggest ensuring policies account for the effect of growth on transportation networks. There must be development standards in place that hold developers to account when there are major impacts to County roads.

Affordable mobility options: Respondents from both highly urban and more rural municipalities identified affordable transit and transportation options as a core issue the County and its municipalities need to address to improve affordability across the board. Stakeholders report that operators of transportation services say that the County need to be more involved in the planning coordination and implementation of these services. The status quo is making difficult for them to stay in business or to have access to higher level government funding.

- **Mobility within communities:** Affordable transit options link directly to affordable housing. Stakeholders identified that having one without the other makes it difficult for residents to comfortably live and work within the County. Local employers also suffer because they are unable to fill positions when residents cannot travel to and from work.
- **Mobility between communities:** Inadequate county-wide transit or affordable transportation options were cited as a major barrier to the economic wellbeing of the County. Some local municipal respondents suggested their lower wage earning residents, often tied to the tourism and service industries, lack cost-effective choices for getting to work – often commuting in private vehicles from inland municipalities to coastal areas at great personal cost while contributing to the increasing road congestion during high tourism season.
 - *The Official Plan should promote increasing active and public transportation options both for the needs we have today but also to reduce the burden on the road network.*

Vehicles for hire: Relatedly, many interviewees also flagged that there is a current gap in policies around vehicles for hire and an opportunity to thread the County’s current work on a Transportation Master Plan into the new Official Plan. Stakeholders report that transportation options are limited due to inconsistent and outdated local municipal rules and policies, and County-wide provisions for private mobility firms to operate in tandem with traditional taxis are absent. Concerns will mount as neighboring counties and

municipalities are already moving forward and it is anticipated that users in those communities will eventually want to use private mobility services to get into Bruce County.

Transportation linkages to environmental and Greenhouse Gas reduction goals. Beyond increased connectivity within the County, expanding transportation options can also help achieve the County's environmental goals. Making it easier for residents to rely on more environmentally friendly transportation methods will also work to reduce the County's carbon footprint.

2.2.6 To create wellbeing through access to complete and healthy communities

Optimism that Bruce County can use this Review to be on the right track for community development:

There is an overall sense of excitement and eagerness across stakeholder groups when it comes to building complete communities. Stakeholders believe there is an opportunity in the new Official Plan to clearly define the County's vision for complete communities so future growth can take place in accordance with those goals. Stakeholders commented that "complete communities" are an integration of many policies, including transportation and transit, housing options, recreation, and economic development.

- *"It is not a policy to be a 'complete community.' You achieve a complete community if you have an integrated range of policies, working together."*
- *"The County has the advantage of having a strategic and overarching perspective that isn't inhibited by local neighbourhood issues. It can help guide local municipalities on how to create and grow complete communities."*
- *"It is all connected. Having more connected communities links to affordability and economic development. Our retail sector businesses are struggling because people don't have the option to live close to where they work."*

Creating communities that are attractive to all life stages: Local municipalities are working towards building communities where people can start families, build careers, and grow old while having access to healthcare, essential services, and schools. In some instances, stakeholders would like to see more flexibility in where things like local businesses can open. Currently, this kind of development is restricted to commercial areas in downtown cores, but flexibility to these rules when appropriate could go a long way in building more integrated neighbourhoods. In instances where the County's Official Plan cannot be permissive, local municipalities have suggested including alternatives that still allow them to grow and achieve their visions.

The need to be "age friendly:" Several respondents identified the lack of a county transit plan or accessible transportation strategy as a major barrier to ensuring the County remains "age friendly" as its demographics shift to older residents. Senior residents are less likely to still own and drive their private vehicles and as a result will become isolated and unable to connect with essential services without access to other transportation options. The County needs to account for this shift to ensure its residents can age in place.

Active transportation to promote a "healthy" community: Stakeholders also highlighted the connection between a more integrated transit system with a variety of transit options and more complete and healthy communities. Active transportation methods in particular are an effective way to increase the connectivity of communities while encouraging healthy lifestyles among residents.

As Bruce County evolves, stakeholders would like to see it become a diverse, attainable, and attractive place to live that is welcoming to people of all backgrounds and socioeconomic statuses.

2.2.7 To identify and manage our cultural heritage resources

Building on strength: Overall, stakeholders agreed that County planning staff does a great job of engaging with and considering the perspectives of Indigenous communities. Stakeholders also acknowledged that the Official Plan makes the need for this engagement clear. In most conversations, this topic was not top of mind for stakeholders and the consensus is that the County is doing well in this area, however two points of improvement were suggested.

- *“County planners do an incredible job considering the importance of cultural significance from an Indigenous perspective and the Official Plan acknowledges this as well.”*

More collaboration on cultural heritage: Stakeholders mentioned that the current universal approach to managing cultural heritage resources, and assessing archaeological impacts specifically, is a challenge. They suggested a more collaborative process is needed to work with the various stakeholder groups to gather their inputs and ultimately make better decisions. Stakeholders called for more support from the province to encourage better collaboration and more flexible planning tools to support the process.

- *“Bruce County excels in this area. Much of its lands are protected and regulated by the County, province, or federal government.”*

Heritage Preservation: Some stakeholders expressed concerns about a lack of protections for historic homes and suggested policies that protect the heritage and character of neighbourhoods. A balance must be struck between the need for development and the protection of culturally significant architecture that reflects the history of the County. It was suggested that the County explore ways to consider cultural heritage during the development process, without restricting it or slowing it down.

- *“I would endorse more protections for culturally significant sites. They are a critical part of the historical fabric of our County.”*

2.2.8 To manage natural resources wisely for future generations

Building on strength: During our conversations we heard that Bruce County excels at protecting its natural environment because of its strict environmental protections. The lands are protected by County, provincial, and federal regulations which stakeholders view as a success when it comes to achieving this principle.

- *“Natural heritage protection is definitely one of the areas where the County’s official plan is excelling.”*

Adopting a systems approach: Areas of potential improvement could include viewing the natural resources from more of a ‘systems approach’ to fully protect the interconnectedness of the natural heritage. Additionally, some stakeholders expressed concerns that the current Official Plan could be more effective in its storm water management, source water protection, and flood prevention policies as development increases in urban areas.

The County is moving forward to support clean energy innovation to make Bruce County a center for clean energy – but it can do more. It should also look to greening its operations, for example, by greening its fleet of vehicles and buildings. New neighbourhoods and buildings should be developed applying green processes and certifications (e.g., LEED). This would help spur local excellence in environmentally advanced technology and practices while reducing the need for waste management infrastructure as well as water and wastewater infrastructure.

Streamline application processes by better integrating source water protection considerations into the application pre-screening process: To reduce delays in approvals and outright refusals of inappropriate development applications on sensitive lands, Bruce County is advised to look at the integration of the *Clean Water Act* requirements. The planning frameworks of several neighbouring counties have done this and respondents cited Grey County’s Official Plan which includes general statements on source water management, information on different designations, and how the policies are to be implemented by local governments in the County. Simcoe County, Wellington County, and Grey County also have screening tools that are used to support development applications in those jurisdictions and avoid delays caused by applications being routed to conservation authorities unnecessarily.

Remembering the need for balance and getting the balance right: Some stakeholders warned that while natural heritage conservation is important, it can also act as a deterrent to development. Conservation policies can be prohibitive and difficult to navigate. It was suggested that there should be more flexibility in settlement areas that are designated for growth to make it easier for the right kind of development to take place.

3.0 Bruce County's Eight Opportunities

StrategyCorp has identified Eight Opportunities that capture these emerging issues based on our consultations with stakeholders and our examination of Official Plans from comparator municipalities.

1. The new official plan should link the diverse areas of Bruce County in a coordinated planning framework
2. Supporting Agriculture and Agri-Business (considerations for the Agriculture Discussion Paper)
3. Focusing on flexible planning policies and tools that are up to date
4. Addressing Climate Change
5. Addressing Housing (considerations for the Homes Discussion Paper)
6. Addressing Transportation (considerations for the Connecting Discussion Paper)
7. Indigenous Community Engagement
8. Creating an Accessible and Inspiring Document

The opportunities we detail in the remainder of this report cut across the eight guiding principles of Bruce GPS and do not fit in a single category. The opportunities are listed and described in greater detail below. The recommendations are also summarized in the report's appendix.

Analysis Methodology

For each of the eight opportunities we report on:

- What we heard;
- What others are doing, including:
 - What other comparator municipalities are doing;
 - Any leading or emerging policies beyond the comparators;
- Our advice

Comparators

The communities that Bruce County is often compared to due to proximity or similarity are:

- Grey County
- Wellington County
- Simcoe County
- Northumberland County
- Huron County

Where relevant we also draw from other jurisdictions which in our view have something relevant that could be seen as a leading practice of possible interest to Bruce County.

Our Advice

Where we provide advice is informed by the design principle that “form follows function.”

By this, we mean that the right Official Plan policies for Bruce County will not be a collection of best practices designed elsewhere to address the opportunities and challenges of other communities.

The right policies for Bruce are policies that address the challenges and opportunities of Bruce. Thus, in our analysis we have used the following criteria for evaluation for recommendations:

- How a policy fits with the growth and economic development needs of Bruce County
- How policy fits with the two-tier county structure of Bruce County
- How a policy fits with the agricultural and environmental protection goals of Bruce County
- How a policy has worked elsewhere, and if there is reason to believe that it could be applied to Bruce County.
- Adherence to provincial requirements, such as the Provincial Policy Statement 2020

3.1 Link the diverse areas of Bruce County in a coordinated planning framework

WHAT WE HEARD

The official plan should create more linkages between Bruce County's communities. Bruce County's official plan directs nearly all growth to its primary and secondary settlement areas but virtually every stakeholder engaged commented that it could be made much more relevant for those urban communities. Many said that the official plan was only for agricultural and rural areas. Several stakeholders were aware of, interested in, or supportive of the Bruce GPS initiative and hoped the new official plan would establish a common framework for the future of growth for the whole County.

- *"I'm ashamed to say I've never looked at the plan – never thought to until I was contacted for this project. Isn't it just for rural areas?"*
- *"I think that plan represents what you could get everyone to agree to back then and ever since we all have just kind of done our own thing."*

Rural municipalities want to see the new official plan spread the benefits of growth around the County. Many rural municipality stakeholders suggested the plan could do more to help them create the conditions to attract residential or economic investment. Several said the current allocation of growth almost entirely to primary and secondary settlement areas needs to be rethought. They suggest that reallocating some growth to their municipalities would help reverse trends of declining economic activity and rapid "graying" of the population.

- *"It would be nice if the [coastal areas] would share some of their growth. We can really use it over here."*

The County planning structure should be more unified. The County's planning system of nine official plans was a source of confusion by several stakeholders. Some directly commented on the framework as confusing or unwieldy and others were not sure which document (county plan, local plan, or zoning bylaw) their feedback applied to.

- *"Do other places in Ontario with our population and development activity have so many levels of planning?"*

While no respondent denied the need for intensification (or density) targets, most often it was the target that was set that was seen to be unreasonable for a context.

WHAT OTHERS ARE DOING

County governments are challenging to manage in a unified way. They are distinct from most regional or unitary municipal structures. County governments often act as a confederation of local governments while the provincial planning framework makes demands of them to set a vision for their evolution and implement supportive policies which often seems to assume a more "command-and-control" function. Local municipal governments are then seen as implementers who refine the broad policies directed from the province and shaped by their County partners.

The province takes over in some comparator Counties. The experience and policies are not completely transferrable from Simcoe, Wellington, and Northumberland Counties to Bruce County given their inclusion in the ["A Place to Grow: the Growth Plan for the Greater Golden Horseshoe"](#) (given recent

changes to that plan these municipalities have yet to update their official plans to bring them in conformity with the Growth Plan). However, all three counties work with their constituent municipalities to assign key growth management policies to implement (e.g., intensification rates and density targets). Given the unique provincial planning framework for municipalities in the Greater Golden Horseshoe their precise division of responsibilities were not considered for this section, though we examined the resulting policies.

The province expects county-level governments to lead their local municipalities on managing population and employment changes. Provincial Policy Statement policy 1.2.4 instructs county governments like Bruce to take leadership in growth management and other issues that cross local municipal boundaries. Under the policies, county and regional governments are to identify and allocate population, housing, and employment forecasts for and in consultation with their constituent municipalities. It also expects that County government will provide direction for where and how growth will be directed, as well as reasonable targets for intensification and redevelopment (emphasis added):

- *1.2.4 Where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with lower-tier municipalities shall:*
 - a. *identify and allocate population, housing and employment projections for lower-tier municipalities. Allocations and projections by upper-tier municipalities shall be based on and reflect provincial plans where these exist and informed by provincial guidelines;*
 - b. *identify areas where growth or development will be directed, including the identification of nodes and the corridors linking these nodes;*
 - c. *identify targets for intensification and redevelopment within all or any of the lower-tier municipalities, including minimum targets that should be met before expansion of the boundaries of settlement areas is permitted in accordance with policy 1.1.3.8;*
 - d. *where major transit corridors exist or are to be developed, identify density targets for areas adjacent or in proximity to these corridors and stations, including minimum targets that should be met before expansion of the boundaries of settlement areas is permitted in accordance with policy 1.1.3.8; and*
 - e. *provide policy direction for the lower-tier municipalities on matters that cross municipal boundaries.*

Some Counties with multiple centres have unified plans. Oxford County emerges as a promising practice for a number of reasons. Notably it is a single plan for the county with detailed policies for its three major urban areas contained in entire chapters and schedules, established in consultation with the local municipalities. Grey County has a mix – where some local municipalities have their own official plan and others rely entirely on the county’s Official Plan.

Even with multiple official plans, Counties can manage growth with a regional perspective while leaving the detailed planning to local municipal governments. Much like Bruce County, Grey County uses a categorization of six land use types for areas of concentrated development (primary, secondary, inland lake and shoreline, recreational resort areas, “sunset strip”, and “Industrial business park”). These each have given objectives and have specific planning directions from Grey County. The remaining settlement categorizations are, by contrast, fairly generic. Even so, Grey County provides local municipalities with the intensification rates required for the primary and secondary areas and requires that an intensification strategy be implemented through local official plans (Grey County OP 3.4.1).

Grey County Official Plan Policy 3.4.1 Intensification:

Municipality	Primary Settlement Area	Secondary Settlement Area
Chatsworth	N/A	5%
Georgian Bluffs	10%	5%
Grey Highlands	10%	5%
Hanover	15%	N/A
Meaford	10%	5%
Owen Sound	15%	N/A
Southgate	10%	5%
The Blue Mountains	10%	5%
West Grey	10%	5%

Each local municipality that has a local official plan must develop an intensification strategy and implement the strategy through its official plan policies in order to phase in and achieve the above noted intensification targets of this Plan. Through the strategy, local municipalities must:

- *Promote and facilitate intensification and efficient use of land in built-up areas;*
- *Identify intensification areas to support the achievement of the intensification target;*
- *Promote the development of mixed-use spaces within settlements;*
- *Identify areas appropriate for revitalization and redevelopment;*
- *Identify the type and scale of development appropriate for the intensification areas;*
- *Identify means to mitigate the effects of intensification on residential areas within intensification areas including consideration of transitional densities, built form, and land uses;*
- *Identify means to protect residential areas outside of intensification areas;*
- *Develop cost-effective and land efficient development standards;*
- *Identify a program for monitoring the achievement of the intensification targets and evaluate the ongoing feasibility of achieving the targets.*

Nuanced density targets are used to set goals for complete community development. Grey County also uses a combination of recommended and minimum density targets for primary settlement areas. Secondary settlement areas are encouraged to pursue intensification in ways that revitalize historic downtowns while maintaining the character of the communities. There are also provisions for settlement areas to plan for densities now that would one day support transit service.

For municipalities with comparable growth rates to Bruce County, we reviewed policy that assumes the vast majority urban growth can be accommodated in existing urban areas designated for development (5.2.2.5.1). Bruce County follows this with a statement that it will not need to designate new urban areas outside minor boundary expansions (5.2.2.5.2).

- *5.2.2.5.1: The land use policies of this Plan have been developed on the assumption that the majority of future urban growth in the County can be accommodated in existing urban areas designated for development purposes.*
- *5.2.2.5.2 It is intended therefore that with the exception of minor boundary expansions, the County will not need to designate new urban areas to accommodate the anticipated future growth of the County over the planning period. However, should an application be proposed to add new large urban areas for development purposes, the following matters should be addressed:*
 - i. A documented justification of need for the major expansion of the urban boundary including consideration of alternative areas for expansion with the intent of minimizing the impacts on the environment and natural resources, including agricultural lands;*
 - ii. A major servicing strategy indicating how the currently designated lands, and proposed new lands will be serviced; and*
 - iii. Any other studies required by the Municipal Council*

The Greenbelt Plan has some of the most restrictive development policies in the province but still allows for some “minor rounding out” of hamlet communities (Growth Plan 2.2.8.3.k). Northumberland County which is partially in the Greenbelt Area (specifically, the Oak Ridges Moraine Conservation Plan) splits growth allocations such that 80 percent of the residential growth goes to settlement areas, and 20 percent to rural areas. To be clear, this ratio was arrived at following a local planning initiative and may not be appropriate for Bruce County.

Oxford County’s Official Plan shows how flexibility can be applied while maintaining the principle of land conservation. That county has a similar policy that assumes existing settlement areas will accommodate growth (County of Oxford Official Plan policy 4.2.2) but identifies “Future Urban Growth Lands” (4.2.2.6) near existing settlement areas. These lands are capable of being fully serviced by the local municipality and the County, should the need arise and other criteria be met, but they are not slated for development in the plan horizon otherwise.

Huron County is generally more deferential to local municipalities about settlement area development and the Plan is focused on rural and agricultural development.

Huron County Official Plan

- *7.3.2.5 In Towns, Villages and Hamlets, the efficient use of land and services is encouraged through increased intensification. Intensification includes redevelopment, infilling, and expansion or conversion of existing buildings. The following targets are established to promote and monitor housing intensification:*
 - a. 20% of total residential development in Primary Settlement Areas will be accommodated through intensification.*
 - b. 10% of total residential development in Secondary Settlement Areas will be accommodated through intensification.*
 - c. Tertiary Settlement Area and Lakeshore Residential Area densities and intensification opportunities will be based on the provision of adequate servicing.*

- *7.3.2.6 Intensification will respect and be compatible with existing neighbourhood characteristics and heritage areas.*

OUR ADVICE

Within the basic framework of county government there is a lot of room to advance policy frameworks and other counties are taking that opportunity. As part of this official plan update exercise, Bruce County’s planning model should be evaluated particularly as it applies to growth management, planning policy, and development approval processes.

Policies should be used to coordinate a Countywide planning approach for settlement areas and hamlets, while remaining sensitive to local contexts. In collaboration with local municipalities, the new County official plan should develop a strategic community planning vision for the settlement areas and hamlets of the region. As much as possible, the plan should identify the unique strength and critical role individual settlement areas play within the county’s social and economic fabric as well as any unique environmental features that should be protected for the long term. The new official plan could, in turn, provide local municipalities with the specific flexibility, support, tools, and direction they need to pursue innovative approaches to the opportunities and challenges to managing their settlement areas.

Bruce County’s Official Plan should be more specific on identifying where and how the region grows. Through collaboration with local municipalities, the County Official Plan should refine the “primary” and “secondary” settlement area land types to identify the amount and types of growth appropriate for different settlement areas and the infrastructure the county government will invest in to support it. The County should develop mandatory intensification and density targets with additional policies and guidelines for local municipalities to refine how they are applied in specific settlement areas, and how modest development through appropriate intensification can help promote reinvestment in hamlets.

Policies for determining land needs should be more nuanced with additional input from rural municipalities. Some change to policy 5.2.2.5 will likely be required as Bruce County develops new population, housing, and employment projections based the regional market area analysis required under the Provincial Policy Statement 2020. In addition to considering some rural settlement areas to accommodate modest growth through intensification, the new Official Plan should also provide the County with levers to facilitate the intensification and residential densities in primary and secondary settlement areas that would be required to ensure its land needs are effectively managed.

The new Official Plan should provide Bruce County with flexibility to respond to the unknown and signal to the development community where it wants to go. Related to the issue above, if a land needs analysis again determines that settlement area expansions will not be required to accommodate growth to the end of the forecast Bruce may consider identifying “future urban lands” in a few strategic locations, as Oxford County has, rather than be left to engage in a new comprehensive review or respond to ad hoc development applications.

Given global events Ontario’s population growth and its distribution is in flux and Bruce County needs to be prepared for multiple possible outcomes. The effects COVID-19 may have on Ontario’s housing market and population distribution are entirely unknown and beyond the scope of this report. Different assumptions lead to wildly different population and employment forecasts for places like Bruce County. For example, early anecdotal evidence would suggest smaller urban places and rural communities like those in Bruce may see new housing demand as widespread telecommuting decreases the need to live near offices in urban cores. Conversely, concerns of a weak economic recovery could lead to lower household formation rates, depressing demand for new housing across the province. Suffice to say, Bruce

County should use tools like identifying potential future urban lands and being more specific on intensification and density targets in its official plan update to prepare for both scenarios.

3.2 Supporting Agriculture and Agri-Business

The County has already advanced in its thinking on updating its Official Plan policies on agriculture. We submit the following three observations and recommendations as potential ideas to consider:

- 1 Preservation of Agricultural Land is still important
- 2 Evolution in the needs of agriculture suggests a rethink on minimum lot size.
- 3 Greater clarity sought on permitted economic uses in agricultural and rural areas

3.2.1 Preservation of Agricultural Land is Still important

WHAT WE HEARD

All respondents recognize that Bruce County has a robust agricultural sector that is an important part of its past, present and future. Agriculture is one of the top three economic drivers of the County. The current plan has policies to preserve and protect agricultural land and these remain important today.

There is broad recognition of the need to continue to support the viability of prime agricultural lands, consistent with provincial policy. Also, as elsewhere, there is a recognition of the inherent conflict between agricultural and residential uses.

The concern was expressed that if new residential development is permitted near faster growing primary and secondary settlement areas, the sensitive uses of the urban community would encroach on the farming operators' ability to work their land. Because of this conflict, policies need to protect against:

- erosion from the edges of core agricultural land, and
- infiltration of residential uses into core agricultural land.

There is Continued Pressure to convert agricultural land to residential. Many stakeholders commented on the pressure to permit owners of agricultural and rural lands to convert to residential uses. In some municipalities there is support for this as a way of getting a "fair share" of growth.

- *"We could improve our overall property tax position if we were permitted to create new residential lots on lands currently designated rural and agricultural."*

Naturally, it is also a major interest of some owners who want to optimize the value of lands that would be worth more as development sites than they are as continued agricultural operations.

A particular instance of this relates to farm succession planning. For many farmers to retire, they must sell their land. This presents a number of policy issues.

In our interviews, we heard anecdotal evidence that in Bruce County there are farmers who want to retire, but cannot find purchasers, because the land is no longer considered viable for profitable agricultural activity due to land quality, lot fabric and size or proximity to incompatible land uses.

- *"Here is the problem. With lots that are close to the town, there is a risk that the residential neighbours complain about the smell or whatever. So, it is a risk to buy it for farming because you are a few complaints away from not being able to use it as you want. It would be way*

more valuable to sell for building new houses...but that is not permitted either. The guy who wants to retire is stuck.”

Several stakeholders said some or all of the land in this edge situation should be available for residential development, which would in effect simply export the same “edge” problem to the neighbouring property. However, other respondents expressed a desire to see that the principle of preservation of agricultural land continue to be paramount, and recommended a hard line against further agricultural land loss.

Overall, the feedback we received is contradictory. Stakeholders agree that agricultural lands are important and must be protected, but also agree there is a need for flexibility when it comes to lands that are no longer viable for farming or instances where farmers are looking to adapt their business offering to the changing market.

WHAT OTHERS ARE DOING

The province leads in setting policy to protect prime agricultural lands for long term use. Under the *Provincial Policy Statement 2020*, prime agricultural area uses are limited to agricultural use, agriculture-related use, and on-farm diversified uses. The latter two uses are not precisely defined in the Provincial Policy Statement, though their general characteristics and some examples are given. It is also stipulated that these uses must be compatible with the surrounding agricultural operations.

The province further protects agricultural uses from incompatible uses occurring nearby by applying minimum distance guidelines that development proposals on other properties must follow.

Residential Development on Agricultural and Rural Land

Farm labour residences are permitted: Grey County’s Official Plan permits a second residence for farm labour, under the proviso that there is an adequate business case provided which includes reasoning which demonstrating why seasonal or temporary solutions would not suffice.

Additional units are recognized and encouraged, but severances of second suites prohibited: Consistent with policies in the PPS 2014 and 2020, the Grey County Official Plan directs local municipalities to update official plans and zoning bylaws to allow to permit them in several building-types, including in the countryside and other areas where municipal services are not provided (with some conditions and safety restrictions). Similarly, “garden suites” are permitted uses in the agricultural and rural areas, and the county official plan provides a process for municipalities to follow to allow them.

Severances of secondary or additional units on agricultural land is prohibited across virtually all County plans.

Most official plans do not allow more than two residences on agricultural land: In total, no more than two permanent residences permitted on a farm property in Grey County, and new dwellings on existing lots must apply the provincial minimum distance formulae to the greatest extent possible.

Large settlement area expansions are not permitted in official plans outside of municipal comprehensive reviews: The settlement area expansion policies in Grey County’s Official Plan are aligned with the 2014 Provincial Policy Statement which prohibit expansion of settlement areas outside of a comprehensive review. Under both cases several conditions exist to reduce impacts to prime agricultural areas.

However, some conditions of PPS 2020 allow municipalities to adjust boundaries outside of a comprehensive review. None of the official plans being reviewed have been updated to include these policies.

OUR ADVICE

Put forecasted growth where it is wanted and where it makes sense. We examined stakeholder perceptions about the ability of local municipalities to ease residential development restrictions on rural lands compared to other municipalities, particularly for settlement expansions and consents (or lot creation). Our analysis showed that the policies for severances and settlement area boundary expansions are consistent with virtually every comparator municipality.

One exception is highlighted and relates to Bruce County Official Plan Policy 5.2.2.5 pertaining to future land needs, where it states that it is anticipated that all forecasted growth can be accommodated within existing settlement areas. While most other municipalities avoid accommodating growth through settlement area expansion none of the comparators have a policy as strongly worded as Bruce County's. As mentioned in the previous section, this should be nuanced through the use of multiple policies and practices applied through a growth management framework which incorporates land preservation with other County priorities. This can be done while maintaining the intent of the policy, i.e., to avoid uncoordinated settlement area expansions outside of a municipal comprehensive review, and would allow a process for interested local municipalities to consider whether and where an expansion may be appropriate in their geography.

As Bruce County itself is now moving into a municipal comprehensive review, through its Growth Discussion Paper, it has the opportunity to re-designate rural and agricultural lands to allow for more residential development through settlement area boundary expansions. Ideally this should occur in a way consistent with our earlier recommendation to develop a stronger and more coordinated community structure for the region and implemented with tools to ensure growth pays for growth.

Bruce County should use an agricultural system approach to plan for its agricultural communities. This is encouraged in the 2020 Provincial Policy Statement and will be a critical asset for Bruce County given the importance of the agricultural community to the County's economic and social fabric. An agricultural systems approach would help ensure the geographic continuity of the agricultural land base and identify, reduce, and mitigate any negative consequences of residential development encroaching on public and private infrastructure which supports Bruce County's farming community.

At a minimum Bruce County should adopt a requirement for development proponents to use Agricultural Impact Assessments as outlined by the Ministry of Agriculture, Food, and Rural Affairs. These assessments would aid Bruce County to identify potential impacts for development on agricultural operations, including farmland, farm operations, and the surrounding area while also providing strategies to avoid or mitigate these impacts.

Clear the Path for Modest Increases in On-Farm Housing to Support Farmers in Every Stage of Life.

There is room to enable greater housing throughout the county's agricultural lands through policies that encourage "secondary suites" and "garden suites" on rural land as well as greater flexibility for accessory housing for farm workers. In addition, the County should work with local municipalities to clear a path for secondary year-round units in existing farmhouses or building clusters.

3.2.2 Evolution in the needs of agriculture suggests a rethink on minimum lot size

WHAT WE HEARD

Stakeholders told us the needs of farm operations are changing. Farming has always been a business, but the business needs of farming are changing as occasional smaller-scale farmers look to enter the business with small plots of land, bucking the much more established trend of farms consolidating and getting larger.

Bruce County currently provides for severances of “generally” 40 hectares, providing it with some flexibility depending on the circumstances. However, the PPS does not prescribe a size, and smaller farm lots are permissible if they are consistent with a given area (e.g., 20 hectares is prevalent in some areas).

Though there is an ongoing trend to concentrate farming in larger operations, which continue to dominate in the production of commodity agriculture, there is a niche that some new farmers looking to enter into agricultural production but without the means or knowhow to engage in a full 40 hectare lot.

WHAT OTHERS ARE DOING

New lots in prime agricultural areas are always discouraged by provincial policy. When lot creation is permitted it is closely regulated and must follow criteria laid out in the PPS which includes provincial minimum distance formulae. Severances that are permitted for agriculture-related uses must be the smallest possible size required to support the use (and appropriate sewage and water services). These are the rules the official plan must conform to.

Minimum agricultural lot sizes to reflect area, agriculture type, and future viability: Grey County, Simcoe County, and Wellington County are up to date on provincial direction for lot creation in prime agricultural areas (no provincial changes were introduced in PPS 2020). As such, they limit the creation of new farm lots to two, and stipulate that both the retained lot and the new lot are “generally” 40 hectares in size.

Wellington permits consents for lots as small as 35 hectares in its official plan and allows smaller if there is “clear evidence” that the farmer’s intended agricultural pursuit can be successful. Huron County defers the minimum farm lot size to local official plans.

New lots cannot be used for residential purposes except for surplus residences: Consistent with provincial policies, Grey and Simcoe Counties also allow the severance of a lot for a surplus residence, provided the owner of the lot can provide that they are a “bona fide farmer” who does not require the residence on the land. The severance in this instance would be the minimum required to provide adequate access to the property and sewage and water servicing, with Simcoe County stipulating that it should not be greater than a single hectare.

In all cases, consistent with provincial policy, the remnant lot would be prohibited from replacing the severed residence through a local zoning amendment.

Some official plans provide flexibility on lot-sizes on a case-by-case basis: Grey County and Wellington County provide flexibility to create smaller lots than their respectively prescribed 40- and 35-hectare minimums without an official plan amendment. In Grey County an Agricultural Report must be prepared by a qualified individual (including an agrologist, agronomist, person with a professional agricultural business degree) while Wellington County stipulates that it requires “clear evidence” that the agricultural pursuit is viable on the smaller lot.

Grey County Policy 5.2.3 Consent Policies (emphasis added)

1) A consent for one new lot may be permitted provided the original farm parcel is a minimum of 40 hectares. The options for consent would be:

- One lot severed to create a farm parcel of generally 40 hectares in size, provided both the severed and retained lots are 40 hectares in size and are both intended to be used for agricultural uses. Where a severance is proposed to create a farm lot smaller than 40 hectares, an official plan amendment will not be required, but an Agricultural Report is required by a qualified individual, (which may include an agrologist, agronomist, or a professional agricultural business degree) that addresses the following criteria:...

Wellington County 10.3.2 Agricultural Uses (emphasis added)

- New lots for agricultural operations shall be of a size appropriate for the type of agricultural use(s) common in the area and sufficiently large to maintain flexibility for future changes in the type or size of agricultural operations. New agricultural lots will normally be a minimum of 35 hectares in size. Smaller lots may only be considered where there is clear evidence that the farmer intends to conduct an agricultural pursuit which can be successful on a smaller property.

Lot severance restrictions near settlement areas: New non-farm sized lot creation (e.g., smaller than 40 hectares in prime agricultural or 20 hectares in rural areas) within 500 metres of a Primary Settlement Area boundary is not permitted in Grey County. In Simcoe County lot creation is discouraged outside but adjacent to or near settlement area boundaries and rural lands within one kilometre of primary settlement areas having prime agriculture policies apply.

OUR ADVICE

Leverage private sector and County staff planning expertise to save council time. By relying on the expert opinion of the County planning staff and in the private sector, flexibility can be introduced into Bruce County's Official Plan where the intent of the policy is honoured while official plan amendments and other Council decision-making processes on minor matters are avoided. For example, Grey County offers that severances of lots smaller than 40 hectares are permissible without an official plan amendment if the applicant has a supportive Agriculture Report prepared by a recognized professional agronomist. Options also include circulating the report to the community or posting online to see if members of the public have concerns. If this is the approach taken, the County should include in its official plan what the report must show.

3.2.3 The community wants greater clarity on the range of permitted economic activities in prime agricultural and rural areas

WHAT WE HEARD

Stakeholders cited a lack of clarity on what economic use are permitted on agricultural-type land without requiring an official plan amendment as a barrier both to existing farm operators and prospective purchasers of farmland.

Updating the official plan and providing a clear path to implement priorities within the County agriculture and rural policy framework can help meet the needs of both perspectives.

WHAT OTHERS ARE DOING

Writing the Official Plan in a way that makes the range of permitted uses more accessible to the reader

Official Plans' age matters: Unsurprisingly, the differences between what official plans allow in agricultural and rural areas and how that is communicated typically reflects when the OP was written. For example:

- Grey, Simcoe, Northumberland, and Huron Counties have official plans that have been updated since 2014 to include a broad suite of permitted uses under the heading “on-farm diversified uses”.
- Wellington and Bruce Counties typically have similar permitted uses, or do not explicitly bar these diversified uses, though they are organized differently (e.g., they do not use the words “on farm diversified uses” and have some policies pertaining to the individual uses distributed throughout their policies).

Providing more detail about what may be done to make it easier for the public to read and understand:

In its Official Plan agricultural policy section, Grey County provides an easy-to-read table which identifies dozens of examples of what is permitted in its Agriculture and Rural designated lands (see figure 2, below). It also states clearly that these are examples only and are thus not intended to provide an exhaustive list. For several of the uses identified in the list, Grey County provides specific direction on how some of those uses should be permitted by local municipalities. It also specifies that an official plan amendment is not required (policy 5.2.2.13).

Grey County Official Plan (see Figure 1)

- *5.2.2.13 Amendments to this Plan will not be required for uses listed in Table 7: Permitted Use Examples in Agricultural and Rural land use types of Section 5.2.1, provided they meet all other policies of this Plan.*

Thus, even though the Grey County Official Plan may not be any more permissive in how the policies apply, it would appear to the reader to give much more certainty and clarity about what uses may be permissible, by contrast to older plans.

Table 7: Permitted Use Examples in Agricultural and Rural Land Use Types

Agricultural Use	Agricultural-related Use	On-farm diversified Use
<ul style="list-style-type: none"> • Growing of all types of crops • Raising of all types of livestock • Livestock barns / livestock facilities / manure storage • Pastureland • Feedlot • Residential uses associated with farming such as houses on existing lots of record, farm help accommodation and second units • Fish farm or aquaculture • Mushroom farm • Christmas trees farms / nurseries • Greenhouses • Grain dryers and feed storage for own farm's use • Feed storage i.e. bunkers / silos • Washing, sorting, grading (of farm's own commodities only) • Machine shed (for own farm's use) • Cold storage (for own farm's use) • Indoor/outdoor riding arenas/tracks • Minimum amount of processing to make a produce saleable (e.g. evaporating maple sap, or extracting honey) • Marijuana/Cannabis production in accordance with any Federal laws 	<ul style="list-style-type: none"> • Apple storage and distribution centre (for multiple farms use) • Farm gate sales or farmers market primarily selling locally grown produce/goods • Agricultural research centre • Winery, cidery, meadery using mostly local fruit or honey • Flour mill for local grain • Grain dryer / storage for multiple local farmers • Farm equipment repair shop • Livestock assembly yard, or stockyard for local farmers • Auction for local produce or local livestock • Farm input supplier e.g. seeds, feed, fertilizer, etc. • Abattoir selling and processing local meat • Food processing plant for local produce (e.g. cider-making, pitting, canning, quick-freezing, packing) 	<ul style="list-style-type: none"> • Home rural occupations (e.g. professional office, bookkeeper, land surveyor, art studio, hairdresser, massage therapist, daycare, classes or workshops) • Home industries (e.g. sawmill, welding or woodworking shop, manufacturing / fabrication, storage of boats or trailers, biomass pelletizer) • Veterinary clinic • Kennel • Café/small restaurant, cooking classes, food store (e.g. cheese, ice cream) • Agri-tourism and recreational uses (e.g. farm vacation suite, bed and breakfasts, hay rides, petting zoo, farm-themed playground, horse trail rides, corn maze, seasonal events, horse/pony events, wine tasting) • Distillery or brewery partially using some local farm inputs • Value-added uses (e.g. processor, packager, cheese factory, bakery) • Retail uses (e.g. farm market, antique business, tack shop) • Food banks, second harvest, or gleaning operations

Figure 1 Extract from Grey County Official Plan (p. 71)

Signalling that the OP may change as there are evolutions in agricultural policy criteria: Grey County's Official Plan also states other uses may be permitted if they can meet Provincial, Grey County, and local municipal criteria for agricultural, agricultural-related uses, or on-farm diversified uses (5.2.1.8). Grey County defers to future provincial guidance in making decisions on what uses may be permitted in prime agricultural areas in the future, reducing the need for "housekeeping" official plan amendments to remain current. This signals to farmers and others that Grey County is open to new interpretations and evolving land uses that support the agricultural community.

OUR ADVICE

Provide Maximum Flexibility for Agriculture-Related and On-Farm Diversified Uses

Some of these problems will no doubt be addressed in policy as the County comprehensively updates its official planning framework to catch up to two iterations of the Provincial Policy Statement (2014 and 2020). We understand this work is already underway through the Agriculture Discussion Paper.

Bruce County should draw from nearby examples like Grey County to ensure that not only is the greatest latitude available to farmers, but it is clear for those seeking to enhance their business, the scope and maximum size is available to them without seeking an official plan amendment. Like Grey and Northumberland Counties, Bruce can use a mixture of broad and scoped permissions (depending on the nature of the use) and can rely on local delegation (depending on the level of local acceptance of the use).

Clarity in permitted uses

As discussed, it appears that Bruce County already has much of the same flexibility provided by several comparator municipal official plans. An opportunity exists for how this can be presented. There are two broad trends in the preparation of policy documents which are to some extent at odds with each other.

For some, the best policy documents are brief and broadly empowering within set parameters. This allows for economy of language and guards against the risk of being too specific. This sort of approach tends to be attractive to expert audiences that come to the task of understanding a document with expert knowledge and experience.

In this vein, some municipalities use terms such as "on farm diversified uses" which mean things to planners, but not to lay people. "On farm diversified uses" has the benefit of now being a better-known term among agricultural land users and planners, and it was defined as a permitted use in the 2014 PPS (without change in 2020). However, for lay audiences, this kind of language of general empowerment can be very frustrating, as it may leave the reader without a clear answer on exactly what the rule means.

Paradoxically, there may not be a lot of actual difference between the final determination of what these terms mean and what is permitted, but for a lay user, a more extensive list of examples may provide greater clarity.

Greater clarity should be provided to landowners through examples of uses that are permitted under the plan, rather than rely on policy language.

This may have the additional benefit of reducing the number of telephone inquiries to planning staff which account for a material portion of the workload of the department. It is notable that this aspect of

the workload is not cost recoverable under the current fee structure. Reducing such calls would reduce the overall burden on staff and pressure for additional resources.

3.3 Focus on Modern Flexible Planning Policies and Tools

When Official Plan's or other planning tools are out of date, this leads to delays in moving forward on a development.

Implementing new planning tools can help the County and local governments address modern challenges and opportunities, particularly around housing.

3.3.1 Official Plan and other planning tools need to be updated

WHAT WE HEARD

Local municipal plans are not keeping up to date; County gets blamed. When we spoke with individuals, particularly those in the private sector, we were told of processes that were triggered by out of date planning documents at the County. These out of date documents had the damaging effect of developers pre-emptively passing over properties that would require amendments to bring them online for housing and other development.

- *"I won't touch a piece of land if it looks like I'd need to get an OPA for it."*

When we investigated the stories to integrate into the recommendations for this report, we found they most often occurred within settlement areas, and thus pertained to zoning amendments and occasionally local municipal plan amendments. We believe that the County Official Plan was assigned blame because County staff deliver planning services for the local municipalities.

A speedier and less cumbersome development process is possible. We heard from stakeholders that nearby counties were easier to get approvals in, though few specifics pertaining to land use planning or the Official Plan were provided. In following up, we did find some tools that are used in nearby counties to allow for some variation from official plans without requiring an amendment, most often an expert report.

The County should ensure it is up to date on municipal finance tools. Though it was not a focus of the interviews, some respondents suggested the new plan should be sure to incorporate changes to the Development Charges Act and the new Community Benefit Charges system introduced by the province.

Process questions make up a substantial part of the County planning department workload. The County currently has a total of nine official plans in place, each at a different level of conformity with the County and provincial planning policy framework. County staff receive many questions about whether and how residents and businesses can develop on their property as a result of this framework.

The County should look at tools to provide flexibility on proceeding without an OPA where it is a desirable thing to do (as noted in the previous section on Agriculture).

WHAT OTHERS ARE DOING

There will always be some inconsistencies between county or regional official plans and their constituent municipalities. IN instances where that is the case in Bruce County, the Official Plan provides the following guidance:

- *2.2.7 No public work may be undertaken and no By-Law under the Planning Act may be passed that does not conform to the Plan. Where a conflict in policy exists between this*

Official Plan and a Local Official Plan, the more restrictive policies shall apply provided that they do not conflict with applicable Provincial policy or regulation.

This can have the unintended consequence of limiting moves towards greater permissiveness in an official plan. For example, if a loosening of restrictions is enacted through the County Official plan it may run in conflict to a more restrictive zoning by-law, and the “more restrictive policy shall apply”.

There is variability among the comparators on the planning process when there is conflict between a local plan and the County Plan. For Simcoe County and Northumberland County, the Plan expressly details that in instances of conflict, the County Plan will prevail.

Simcoe County Official Plan

- *4.11.3 Where there is a conflict between the policies of this Plan and a local official plan, this Plan shall prevail to the extent of the conflict.*

Northumberland County Official Plan

- *F.3 Local Official Plan with County Plan*
 - a. It is the intent of the County, and a requirement of the Planning Act, that local Official Plans shall conform to the County Plan and be one of the primary means of implementing the policies herein.*
 - b. It is recognized, however, that some time may elapse between the adoption of this Plan and the modification of the local Official Plans to ensure conformity. The modifications may be part of the statutory review process, as defined under the Planning Act.*
 - c. In the event of a conflict between the provisions of a local Official Plan and the provisions of this Plan in the interim period, the provisions of this Plan shall prevail to the extent of that conflict.*
 - d. Nothing in this Plan shall prevent the local municipalities from adopting more restrictive policies or standards than those outlined in this Plan, provided such policies are consistent with the general intent of this Plan*

The Simcoe County plan also has an explicit requirements for regular updating and harmonizing local and county plans, directing local municipalities to amend where necessary to conform within two years for an official plan and three years for a zoning bylaw. It also cites its authority under the Planning Act to initiate a process to amend the zoning bylaw or official plan of a local municipality that is not in conformity.

Simcoe Official Plan

- *4.11.1 In accordance with Section 27 of the Planning Act, local municipal official plans and Section 34 by-laws under of the Planning Act shall be amended where necessary to conform to this Plan. Within two years of the date of approval of this policy, local municipal official plans*

shall be amended to be in conformity with this Plan. Zoning by-laws will be amended within three years of the approval of the local municipal official plan.

- *4.11.2 In accordance with the Planning Act, the council of the County of Simcoe may initiate a process to amend an official plan or zoning bylaw of a local municipality if an amendment required by 4.11.1 is not completed in a timely manner following the approval of this Plan and if considered necessary to ensure that development applications proceed in conformity with the provisions of this Plan.*

Grey County gives precedent to the local plans as the County Plan is considered to be more generalized and the local plan more detailed.

- *9.2.8.A The County Official Plan would be the upper tier policy document used to evaluate development and approval of local official plans and/or secondary plans adopted by local municipal council. Where a local official plan and/or secondary plan conforms to this Plan, the local official plan and/or secondary plan is the effective and operative document and the detailed policies contained prevail over the generalized policies of this plan. Any local official plan amendments would be subject to review and evaluated for conformity to this Plan*

The Official Plan for the County of Wellington does not describe whether the County plan will prevail when there is a conflict for local plans, but instead details that the local plan must be in conformity, which is considered 'to mean implementing the spirit and intent of the Wellington County Official Plan.

Wellington County Policy 14.1

CONFORMITY TO THIS PLAN

- *All municipal official plans, zoning by-laws and public works must conform to the policies of this Plan. The County considers conformity to mean implementing the spirit and intent of the Wellington County Official Plan with a view to furthering its broad policy objectives, All municipal official plans and zoning bylaws shall be brought into conformity with this Plan. 14.2*

FLEXIBILITY OF THE PLAN

- *No official plan can hope to anticipate all the varied circumstances that may arise in a changing community. To ensure the public interest and to prevent undue hardship flexibility may be used to allow minor deviations from the text or map. This flexibility is to be exercised keeping in mind the intent of this Plan.*

Huron County also describes that local plans must conform to the County plan, but does not describe which plan prevails in a conflict. Huron County instead details that when conflict within/across local municipality occurs it will be addressed through 'a coordinated, integrated and comprehensive approach will be used'.

Huron County Official Plan Section 8

- *... Local communities will use these general guidelines to review and update their existing plans in order that they conform with the County Official Plan. Existing official plans will stay*

in force until a new local plan is passed under the new County of Huron Official Plan. The County will be the approval authority for all local Official Plans.

OUR ADVICE

The new County Official Plan should include provisions to help local municipalities keep planning documents up to date. To respond to stakeholder concerns about out-of-date zoning and local official plan policies, where possible the County should set a target refresh date for local official plans and zoning by-laws following a County-wide amendment. Upon reviewing their workplans, local municipalities could request a County initiated official plan amendment if they believe that would be most expedient.

Bruce County should consider a more unified official plan framework. The County currently has a total of nine official plans in place, each at a different level of conformity with the County and provincial planning policy framework. A more unified planning framework in the County and among its local municipalities would cut down on the number of processes. With over 50 percent more population and a similar urban-rural profile to Bruce County, Oxford County has the tools to manage growth while respecting local municipalities' interests and contexts. This has the effect of enabling a coordinated approach to growth management. For municipal councils and their public servants, it means only one document requires timely updates to keep up with pressures, opportunities, and changes to provincial policies. For the development community it creates a system where a single official plan document is consulted when contemplating a project simplifying what is required to advance development. For the public it creates a single resource that outlines the vision for both their county and their local community.

Given the need for swift action on increasing the supply of housing in the County, local municipalities should be supported in updating their planning documents simultaneous to the County-wide official plan update. A review should be run through local official municipal plan and zoning by-laws as the County seeks to update its Official Plan. The County Official Plan could include provisions to facilitate the update and streamline the local municipal ratification process.

3.4 Addressing Climate Change

Climate change will continue to threaten the financial stability, built environment, and public health of communities globally. Governments across Canada have committed themselves to policies to limit climate change, with the federal and provincial government having committed to reducing GHG emissions by 30% from 2005 levels by 2030. This transition requires action from all levels of government and across all sectors. Municipalities have long been leaders in the world's fight against climate change. In Canada this is especially true, with over 50% of our emissions under the influence or control of local governments.

The magnitude of climate change makes it difficult to distill ways that are relevant for the average resident and business owner to impact change. However, the effects are already being noticed across Canada, Ontario, and Bruce County, particularly with increasingly variable weather patterns leading to unpredictable lake level changes, and extreme events hitting our communities producing floods and droughts. Bruce County's agriculture, tourism, and energy sectors all have unique vulnerabilities to protect for and contributions to make to both the global cause and the local effort.

Bruce County is already a leader in green energy and is working towards becoming the Clean Energy Capital of Canada, making the County uniquely qualified to act as a leader in climate change policy as it relates to its Official Plan. The County can lay the foundation for this kind of transformational change by putting the proper long-term planning goals and framework in place through its Official Plan.

Bruce County has an opportunity to better understand and limit its effects of climate change through - policies that address greenhouse gas emissions, improved energy efficiency and reduced wasteful practices. These issues can be translated into policy within an official plan, committing Bruce County to mitigating the causes of climate change where it can have a tangible impact.

While a commitment to climate change action within the official plan will be needed, identifying actionable steps towards climate change adaptation and mitigation are critical. The official plan update process and development of new policies presents the County with an opportunity to lead that conversation. The County can then implement the development of a framework to guide its local municipalities through the process of recording, monitoring and evaluating their progress.

To be a leader, Bruce County needs:

- A Plan that grounds the impacts of climate change in the local environment, and;
- A commitment to actionable policy steps to mitigate its contribution to climate change and reduce its impacts for the people, businesses, and environment of the county.

3.4.1 The impacts of climate change in the local environment should be grounded in the plans.

WHAT WE HEARD

Bruce County has a breathtaking natural environment, but it comes with its own set of risks. Wildly fluctuating water levels on the County's two Great Lake coastlines makes the County more susceptible to flooding and erosion, while making beach access unpredictable for tourists' season to season. Increasingly unpredictable weather patterns can make farming even more challenging than before climate change, with farmers fields left as soaking bogs from a sudden downpour on moment, to bone dry from extreme heat and unrelenting sun a week later.

- *“Everyone wants action on climate change but there’s no single right answer and you’re left with a lot of things that cost a lot of money.”*
- *“I don’t know if people understand the choices we have to make. It’s more than whether or not we put up windmills.”*

It is critical that there is a public understanding of the effects of climate change in order to meaningfully address them. However, these effects can be difficult to grasp due to the complex and interconnected nature of climate change. At times, the use of scientific language, such as environmental processes and emissions can be confusing to audiences who are unable to connect the global picture to their community. This leads residents to systematically underestimate the degree to which their local actions, and that of their community, impact climate change.

WHAT OTHERS ARE DOING

Grey County was the only comparator official plan which has a section on climate change which brings it into focus for residents.

Grey County Official Plan 7.13 Climate Change

- *Climate change is considered by many to be the world’s biggest challenge in the coming century. Grey County’s weather is already changing and will continue to change. We can expect that there will be more frequent snow squalls, more extreme rain and flooding events, and warmer summer temperatures. We must take action to adapt to and mitigate the effects of a changing climate. This will include making greater efforts to protect and to enhance the resiliency of our natural, built, and social environments. This Plan has been written with this objective in mind.*

The City of Guelph has long been regarded as a leader in “green” city building and urban development. In its section on “protecting what is valuable”, the City official plan states:

4.6 Climate Change

- *It is widely acknowledged that human activities are a significant contributor to global climate change. Foremost among these activities is the emission of greenhouse gasses when energy is generated from fossil fuels. Climate change is predicted to have significant negative impacts*

on human health and safety, property, the natural and cultural environment and the economy.

OUR ADVICE

The official plan update provides an opportunity to make the seemingly distant impacts of climate change more tangible for Bruce residents and businesses. The official plan will look 25 years into the future of Bruce County. What changes that are already going to happen can Bruce County expect by then? Canada has committed to reducing our carbon emissions by 30 percent from 2005 levels by 2030, only 10 years away. What does the County need to have in place to be ready for that shift or even help it? Canada has committed to a target of net-zero emissions by 2050. What will that look like in Bruce County?

The official plan should bring the effects of a changing climate to what residents and business understand. While recognizing that it is part of a world-wide effort, Bruce County's Official Plan should draw attention to the unique challenges that unmitigated climate change can do to its own environment, people, and economy. Similarly, Bruce County's unique opportunities in fighting and adapting to climate change should be front and centre. Focusing on local impacts and mitigation efforts can help keep the goal of identifying tangible actions front and centre.

Work with the Saugeen Valley Conservation Authority, Grey-Sauble Conservation Authority, and Maitland Valley Conservation Authority to identify economic and environmental hazards emanating from a changing climate. The official plan review is an opportunity to identify the County's potential vulnerabilities to climate change and link them to tangible policy changes.

The region's Métis Indigenous communities should be engaged to bring their perspectives and understanding to the conversation about climate change. In addition to being partners in managing the land today, Métis Indigenous communities have traditional knowledge and practices that will likely be valuable in adapting to a changing climate. These communities may also have unique needs and the County should work with them to address those needs if assistance is requested.

An effective strategy in assisting the reader comprehension, is to ground the effects of climate change in a local context. This can be achieved through identifying the specific effects of climate change as it relates to the municipal context. This can include identifying geographic areas that are vulnerable to climate change, and their effects (ex. the effects on Bruce Peninsula National Park), singling out vulnerable demographic groups (ex. seniors), pinpointing specific industries that are vulnerable to climate change (ex. agriculture and tourism). It is important that climate change policies give a contextual framework to understand the impacts of climate change within their own community, to assess their role and buy-in to any proposed policy changes.

3.4.2 A commitment to actionable policy steps to reduce the impacts of climate change.

WHAT WE HEARD

The impacts of climate change are becoming increasingly woven into our societal realities and municipalities around the world are beginning to turn their focus to slowing its progression. Municipalities have a responsibility to prepare its residents, businesses, and infrastructure from the effects of a changing environment before they are unable to do so.

Our work with other communities has confirmed active stakeholders are engaged on this issue. People are becoming more focused on climate change and they are looking to their County for leadership.

Municipalities across the province are declaring a climate emergency to underline their commitment to action. Bruce County already has significant and effective protections in place for its natural resources, but more can be done to make the County's climate goals explicit. Threading these goals throughout the Official Plan will bring a protection-oriented lens to the way the County approaches building its future.

The Bruce County Official Plan review is an opportunity to incorporate provincially mandated changes to the County's planning policies that align with its commitment to slowing the effects of climate change.

- The province requires municipalities to prepare, "for the impacts of a changing climate through land use and development patterns" (Provincial Policy Statement 2020 1.8.1).

WHAT OTHERS ARE DOING

Grey County stood out as a leader in its group of local comparators for its approach to climate. Within the Grey County Official Plan, the County outlined the significance that climate change has on a global level, and local level, engaging the residents of Grey County. Grey County additionally committed its Official Plan to climate change policies not only within its own section, but throughout the document, creating a 'lens' for climate change that reflects the complexities and interconnected nature of the issues.

Grey County Official Plan Policy 7.13 Climate Change (Continued)

- *... the County of Grey will work towards creating a Climate Change Action Plan that will coordinate the County's efforts to embrace and facilitate resilient, sustainable development to mitigate the effects of climate change within our communities.*
- *The County can become more resilient to climate change. Our efforts to adapt can also help Grey County remain affordable and economically competitive. The emerging green economy will provide significant opportunities for creative solutions, innovation, and job growth.*
- *The following are principles and policies to assist with mitigating and adapting to the impacts of climate change:*
 - *Parks and open spaces provide opportunities to increase tree canopy and woodland cover across the County.*
 - *The proper construction, maintenance, and upgrading of infrastructure is essential in maintaining its capacity to function currently and under the effects of climate change.*
 - *Green technologies and construction methods will be used whenever possible and feasible for new construction and the replacement of civic infrastructure.*
 - *Monitoring the impacts of climate change on our systems, for example the natural heritage system, will allow us to adjust management activities, to best maintain their integrity and resiliency.*
 - *Under climate change, the risks associated with natural hazards may change and this should be considered as we plan for the future.*

- *Active transportation provides an opportunity for communities to reduce their carbon footprint.*
- *Mixed use development and housing intensification allows for more efficient use of existing and planned infrastructure and should be encouraged.*
- *Encourage reduction of building demolition waste through the adaptive reuse of older and existing building stock.*
- *Promote retrofits for energy efficiency in built heritage structures while maintaining their cultural integrity.*

Within its Official Plan, Grey County also outlined its commitment to a “Climate Change Action Plan”, though it was devised under the previous provincial government policy which is no longer in effect. This policy created a county responsibility to take climate change policies a step forward. In 2020 this commitment was fulfilled with the municipality beginning their consultation for a climate action plan, outlining a framework and emissions targets that the municipality to commit to.

Wellington County has the consideration of climate change as part of its planning approach to land use patterns in the urban system which:

- *7.3.a.ii “shall be based on ... densities and a mixes of land uses which ... minimize negative impacts to air quality and climate change, and promote energy efficiency” (7.3.a.ii).*

Simcoe County’s Official Plan takes a significantly scoped approach, assigning the responsibility of responding to climate change to local governments when they are contemplating development in flood plains and other hazards.

Simcoe County Official Plan Resource Conservation

- *4.5.13 Local municipalities shall consider the potential impacts of climate change that may increase the risk associated with natural hazards.*

The City of Guelph recently updated their Official Plan in 2018 and chose to both embed climate change policies throughout their plan, including policies addressing the Natural Heritage System, transportation, urban structure, urban design and land use and also within its own section. The section outlines the city’s commitment to:

- *Minimize vulnerabilities to the impacts of climate change and includes planning and strategic decisions that anticipate changes in temperature, precipitation, severe weather and increased variability in these both globally and locally. Among other issues, climate adaptation is particularly important to infrastructure planning, flood protection, emergency management and planning for secure access to water and food.*

The City of Guelph when beyond policy commitments, by committing to specific emission targets, and development standards It to increase community resiliency to climate change through measurable commitments.

City of Guelph Official Plan Policy 4.6 Climate Change

- *City will establish policies and undertake programs to target reducing annual greenhouse gas emissions by 60% from 2007 levels to 7 tonnes of carbon dioxide (equivalent) per capita by 2031.*
- *The City shall work with partners in the community and other levels of government to prepare a comprehensive climate change adaptation strategy.*
- *The City will implement urban design and development standards to reduce climate change impacts on public works and infrastructure including roads, bridges, water and wastewater systems and energy distribution systems.*

OUR ADVICE

The County should establish itself as a leader in climate policy, while keeping it tailored to its unique communities. Many communities understand that they need to adapt to a changing climate and pull their weight in mitigation efforts but there is no real template to follow. With its unique combination of zero-emission nuclear energy, agriculture, and tourism, Bruce County could become a municipal leader in this space, at a national or even global scale.

We recommend that the future Bruce County Official Plan include measurable goals and related policies to mitigate and adapt to climate change. The goals that are listed within the Plan should be specific and tangible. Examples can include specific measures to reduce corporate and community emissions and numeric targets to reduce short term and long term GHG emissions. Targets for adaptation could include re-naturalization, increased tree canopy, and new installations of permeable surfaces.

The Clean Air Council is an Ontario coalition of 30 Ontario municipalities working collaboratively on the implementation of clean air and climate change actions within their communities. In 2018, the group outlined key recommendations including climate change policy into Ontario Official Plans. We advise that Bruce County adopt the recommendations as outlined below:

- *An energy and greenhouse gas emission inventory*
- *Greenhouse gas reduction target (as well as other associated targets that the municipality deems important (ex. energy avoided costs target)*
- *Develop a plan or strategy that outlines actions that the municipality and its stakeholders have prioritized for implementation*
- *Indicators on progress made towards actions and/or emissions reductions*
- *The monitoring and reporting framework in place for the Plan and the timeframe associated with progress reporting; and*
- *Time frame and process for evaluation and updating of the Plan.*

3.5 Addressing Transportation

The County has started the development of a Master Transportation Plan and expect to have a plan in mid-2021. We understand the plan will not include rail, air, or water transportation but will consider connecting these transportation nodes.

WHAT WE HEARD

Several stakeholders suggested that the County should consider a transit network in the near- to mid-term (i.e., within the first 10-year horizon of the next official plan). While an exciting concept, the decision about whether that is right for Bruce County right now goes much further than an Official Plan update. However, we have included the feedback as it illustrates interrelationships to other aspects of the official plan update.

A big opportunity for the County is in developing a transportation network or master plan. One area that almost all stakeholders identified as a gap the County needed to fill was transportation infrastructure and service planning. This concern went beyond seasonal traffic – most stakeholders interviewed identified the limitations of the current network and the transportation services available for a variety of topics. A dense network of active transportation routes was identified as a potential economic driver for inland communities that could provide a new offering for visitors and residents who enjoy Bruce County for active lifestyle opportunities.

- *“If I could get an all-season path from here to Kincardine I’d be able to attract young new workers who want to have an active commute.”*

Low-cost transportation options could boost the region’s affordability and economy. We heard from several respondents that lower-wage earners typically live inland, in less expensive housing away from the coastal communities they work in. These critical workers rely on private vehicles to get to their jobs, often at significant expense which can cause a pricing-out of employment opportunities – where either they do not earn enough to justify the cost, or employers cannot afford to pay enough to make up the difference.

- *“Maybe regular bus runs from [inland] to the coastal communities a couple times a day in the summer would help service workers who live here and have to travel there every day.”*

Additional transportation options fit into a broader conversation about affordability. Providing social services and affordable housing to those who need it is helped with affordable transportation options. Outcomes improve when there is an affordable way for lower income residents to get around while seeking or keeping employment and meeting their day-to-day needs. Several explicitly noted the interrelationship to transit provision being critical for economic activity of residents who do not drive and do not qualify for mobility assistance programs.

- *“More affordable transportation alternatives would open up more of the county for affordable units.”*
- *“I know transit can be expensive, but Innisfil worked with Uber to come up with something for their people without cars to get around – I’d like to know if we can try that here.”*

New options for seasonal commuters and low-cost travellers. Several stakeholders noted that a transit connection could alleviate pressure on road infrastructure and parking resources from the increasing numbers of workers and tourists travelling to destinations in the north peninsula using Highway 6. There

is already significant parking overflow in high season which can be dangerous and leads to time spent in vehicles instead of visiting communities, sites, and attractions and otherwise engaging in the tourism economy.

WHAT OTHERS ARE DOING

Most Counties reviewed carve out an ambitious role for themselves in establishing a transportation master plan in the policies of its official plan. Whether it is a “complete transportation system” in Grey County, and “integrated” one in Northumberland, a “comprehensive and sustainable” one in Simcoe County, or a “safe, reliable multi-modal transportation system” in Oxford, the general principles for the County are the same: maintain and improve the regional transportation network, better link the settlement areas or the counties, provide transportation alternatives to private automobile use like transit and safe active transportation routes, and plan land uses around existing and planned infrastructure.

Providing transit that is reliable and affordable for users while being cost-effective for municipal governments is one of the toughest jobs a municipality can undertake. This is even more so in multi-urban centred rural contexts like Bruce County.

The Town of Innisfil has developed “steps” for transit service implementation beginning with an on-demand model in partnership with Uber and provided for it through their official plan. In this way, Innisfil is demonstrating a principle of transportation planning that is rapidly being adopted around the world: providing *mobility services* rather than discrete transportation modes.

Innisfil Official Plan (as adopted by Council January 2018)

- *5.4.4 We shall implement a demand-based transit model in the short term, which may evolve to incorporate a fixed route transit model over the long term, based on the future transit network identified in the Transportation Master Plan.*
- *5.4.5 The transit network, whether a demand-based transit model or fixed route transit model, shall connect the Town’s key place making destinations, as identified in Section 3.1 of this Plan, along corridors of higher density, and the GO Station planned in the vicinity of the 6th Line and the rail corridor.*

Grey County recently inaugurated its “Grey Transit Route” or GTR service, with service starting on September 14, 2020. The GTR provides residents and tourists to Grey County with a cost-effective means for travelling within and among the different communities in the area. The County used its official plan update as a platform to commit to the development of the system. They also built in room for technology use.

Grey County Official Plan Policy 8.5 Public Transit (emphasis added)

- *1) In light of the County’s aging population, and the increasing number of people who do not have access to a vehicle or are unable to drive, the importance of providing transit services throughout Grey County continues to grow. As such, the County in partnership with local municipalities and existing transit providers, will work towards developing a county-wide transit system that is accessible for all age groups and disabilities, and integrates with the overall complete transportation system. When considering options for a county-wide transit system, consideration should be given to the use of technology to increase ridership by filling empty seats and to better*

plan routes. The use of such systems as car/ride sharing and car-pooling should be considered when exploring options for developing an overall county-wide transit system.

But not all transit policy is about rolling stock and fares.

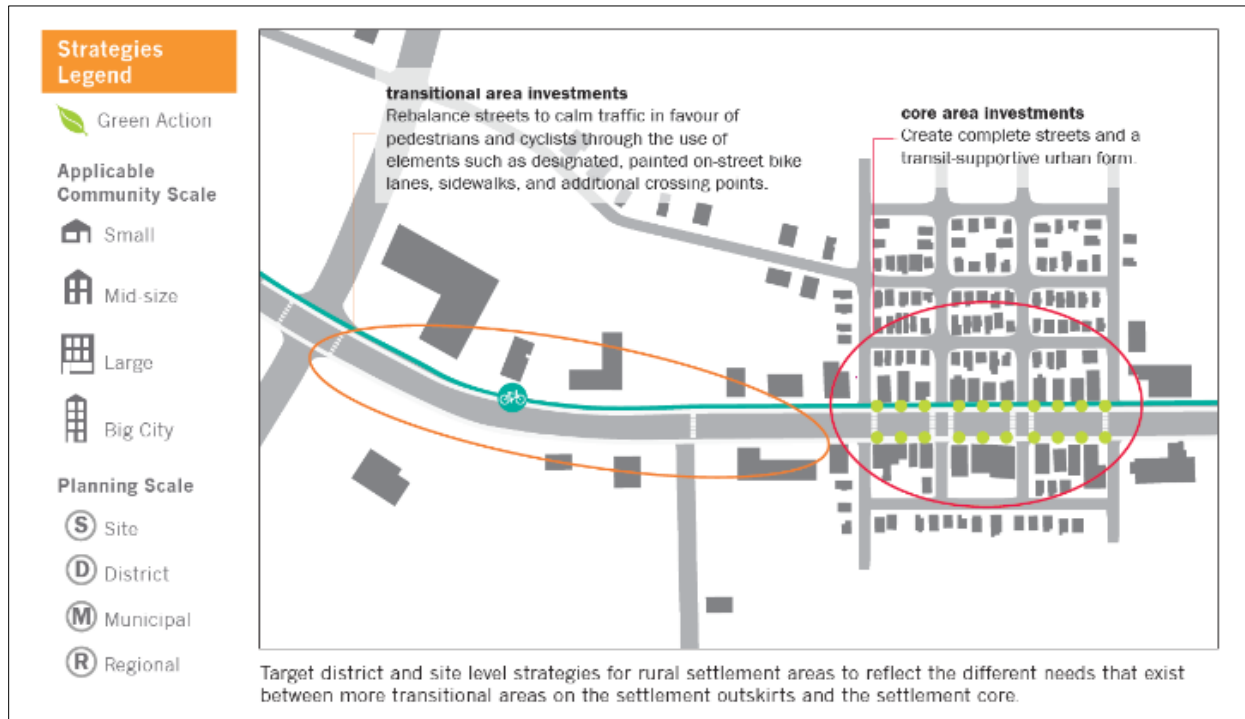


Figure # 2 – "Target Strategies" Image from p.22 Transit Supportive Guidelines, Queen's Printer Ontario.

The province's transit supportive guidelines have advice for getting rural communities ready for transit in the future. In policy 1.1.6 (Figure 1) the guidelines recommend that growth be directed to rural settlement. It provides the following strategies for land use in rural areas:

1. *Designate appropriate growth areas in settlement areas and rural settlement areas.*
2. *Establish policies to limit residential development outside of designated settlement areas. This will help rural areas maintain their character and will direct growth to centres that have greater potential to support transit service.*
3. *Protect natural areas and their ecological functions from development. Maintain, restore and enhance these areas where possible.*

In advance of the new transit system, Grey County applies settlement area density targets for new developments, which are themselves a meaningful way of setting goals and measuring the result of their intensification target. For example, its official plan policy 3.5.5 (emphasis added):

- *For the City of Owen Sound and the Town of Hanover, it is recommended that a minimum development density of 25 units per net hectare will be achieved for new development. For all other Primary Settlement areas, a minimum development density of 20 units per net hectare will be achieved for new development. The County encourages new development to be of a form and*

density which is supportive of future transit needs in accordance with the Province's Transit Supportive Guidelines, or to develop similar municipal guidelines that achieve the same objective

In contrast, Simcoe County “encourages” local municipalities to implement transit supportive guidelines in their official plans (4.8.41); However, it commits itself to adopting a “Mobility Plan” (4.8.13) that would incorporate:

- a) Connections between communities with a priority on active transportation and transit;*
- b) Integration of alternative transportation networks;*
- c) Partnerships with local municipalities for internal systems of pedestrian and cycling facilities that facilitate linkages and provides opportunities for multimodal transportation uses within a community;*
- d) Supporting local municipalities in developing active transportation system maps that identify existing and planned facilities;*
- e) Providing guidelines for clearly signed or marked cycling facilities where cyclists may be accommodated within existing cross-sections to enhance a presence and sense of permanence;*
- f) Liaising with local municipalities regarding planned or future transportation nodes and transit corridors (the County will consider amendments to this Plan as required); and*
- g) Collaborating with local municipalities to ensure the provision of sidewalk and trail facilities, where planned.*

Though Wellington County’s official plan rules out public transportation to its horizon, it does commit to “continue to focus its planning efforts on supporting urban centres and downtowns so that public transit may become a viable option.”.

OUR ADVICE

A stronger role for the county in planning for, implementing, and maintaining a regional transportation network. Several stakeholders said they see this as an opportunity for the County to provide tangible leadership on an issue that most residents and businesses have a daily experience of. In reviewing the official plans for this report, Bruce County has similar populations, growth rates, settlement demographics, and challenges to the counties with robust and ambitious policy frameworks for their transportation networks.

The County should consider adopting policies in its official plan that would establish a mobility-based transportation planning which includes transit and active transportation. This sort of provision would enable the county to contemplate a holistic “mobility service” provision in the official plan rather than focusing on which types of capital will be required for transit, cars, or active transportation routes.

Bruce County may want to consider implementation “steps” as Innisfil has done. A “Mobility Plan” as contemplated in Simcoe County’s Official Plan may also provide a useful template for the County.

The County should ensure provisions exist in the new official plan the leverages private sector players to support more efficient use of existing transportation resources. For example, the official plan update can facilitate the creation of transportation hubs in communities like Warton, Walkerton, South

Hampton, and Hepworth where visitors park private vehicles and connect with regional transit (or private services) to get to the most visited sites in the County. Routes could also be established to draw visitors to under-appreciated sites of the beaten path, in parts of the county that could use more tourism dollars.

We also understand some discussion is underway with Grey County about the potential to work together to improve mobility options for people in the two counties. If so, in addition to the recommendation above, we recommend room also be given for that in the official plan using a policy similar to that used by Innisfil in their official plan:

- *5.4.6 We shall work with the County of Simcoe and neighbouring municipalities to plan for the integration of the Town's transit network with existing and planned transit networks by those jurisdictions.*

The County should consider active transportation corridors as a means of linking communities and settlement areas together while providing alternatives to private vehicle use. As commented by some of those interviewed, this could also produce economic opportunities for inland and rural communities to participate in the County's tourism economy and attract new residents.

The new official plan should put in place some of the land use building blocks required for the county to implement a transit system – one day. However, work can begin now to create the urban form that would support County-wide transit. Historic downtowns, commercial centres, specific hamlets which already have or will have adequate servicing, and other key locations in the County should be given intensification targets and other supportive policies that would reasonably see their densities increase to one day support basic transit service.

3.6 Addressing Housing

WHAT WE HEARD

The County should play a greater role in helping the communities of Bruce meet housing challenges and opportunities head on. Several stakeholders suggested that given pressing challenges around issues that cross political boundaries like decreasing affordability, the effects of climate change, an ageing population, and demands for greater mobility, the County should take on more a leadership role in coordinating Bruce’s response. The “work from home” phenomenon due to the COVID-19 pandemic also prompted some respondents to ask if the County has a plan to attract higher-paid GTA office workers to live in Bruce County now that they may no longer have to commute to an office in Toronto five days a week.

- *“I don’t want them involved in everything we do but some problems like climate change and affordability are too big to deal with at the local level and just cut across everything in Bruce.”*

The official plan should have adaptable policies for local municipalities and stakeholders to generate more affordable housing options. Some stakeholders identified adequate housing options and affordability as a concern, particularly for the future competitiveness of the County. Most reported they did not know if the County Official Plan had or could have tools in it that would help improve housing affordability. Many said their unfamiliarity was due to the Official Plan being too complicated or rural focused. When examples of official plan policies that could support housing needs in settlement areas were identified (e.g., existing affordable housing policies, residential intensification policies, facilitating secondary suites, brownfield redevelopment) all suggested that the new official plan should implement them. Further, stakeholders suggested that the County should also identify and remove where possible any remaining barriers to implementation that persist.

- *“I think the County should use the official plan update to show what local municipalities can do with issues like ‘tiny homes’ and incentives for affordable housing and secondary suites.”*

The good policy may require nuance and local adaptations to work for the whole county. Stakeholders noted the density policies in Bruce County’s Official Plan (6.5.1.3.f) and questioned whether it could be effectively applied across the entire County. It was noted that getting a to the density targets on a plan of subdivision may not result in that density getting built. The higher density building type that allowed a development to proceed under the rule can be left to the final phase of development, when it may not be built at all or a developer can re-apply to replace the higher density unbuilt building with lower density housing.

- *“I get why they want the density target, but maybe we can figure out a better way of getting there”*
- *“Bruce needs to protect its heritage buildings while preparing for more growth. We risk ruining lot of the things that make this place so beautiful.”*

WHAT OTHERS ARE DOING

Intensification and density targets are the first tools municipalities tend to reach for to prompt the market into developing more affordable housing types. As discussed in section 3.1 “Link the diverse areas of Bruce County in a coordinated planning framework” and 3.5 “Addressing Transportation”, many

of the comparator municipalities have policies which facilitate and promote residential intensification targets and increased densities in new developments. Further, the PPS requires regional and county levels of government to lead on targets for the County and local municipalities. Many rural Official Plan's studied for this section also contemplate targets as a means of shifting their market to more affordable unit types.

Targets can apply to larger geographies, allowing for more local implementation. [The Places to Grow: Growth Plan for the Greater Golden Horseshoe](#) applies targets to regional, county, and unitary municipal governments. The regional and county governments then distribute the tiers to their local municipalities, generally applying higher density and intensification requirements to faster growing municipalities and lower ones to slower growing areas. If they choose, local municipalities can then refine the application of the targets for particular settlement areas further, reflecting local characteristics and ability to accommodate growth while ensuring the assigned target for the municipality as a whole is hit.

For several years the Community Planning Permit System (CPPS) has been available to Ontario municipalities as a means of speeding up development and growing defined areas in a predictable manner. The CPPS is a system that would pre-approve planning permissions on parcels of land that effectively cannot be altered for five years following its implementation. Like a Zoning By-law a CPPS by-law identifies permitted uses and minimum and maximum development standards for a site or area. However, a CPPS by-law can also set conditions for building to those standards including infrastructure requirements, community contributions, and environmental impact mitigation among others.

The CPPS is seen by many local planners as an ideal tool because it removes the uncertainty and often costly delays brought on by the planning process. It provides both the developer and local community with a clear set of expectations and removes the risk of projects being blocked by residents and Councilors in appeals processes.

A CPPS also provides developers with consistency across projects (and within a single project) and creates a predictable density bonusing regime that they can access if their market conditions allow. Additionally, the CPPS process moves public participation to the front end of the system, removing the need for multiple public consultations throughout the development process. The CPPS is a powerful tool that almost every public and private actor in the land and development sector wants to see work, yet it has not been successfully implemented in any part of the province.

Key among the reason are the flip sides of what makes them attractive. For example, the proactive planning work can be time consuming and expensive, and municipalities often prefer to leave that to developers who will make the money back from their developments. The appeal provisions can make some more anti-development ratepayer groups uncomfortable as the permissions are baked in at the start and last for several years. Similarly, politicians lose some control over the development process once the CPPS is enacted, as it is left to the planning department to follow the plan as it was set out.

A condition of using the CPPS is that a framework for its application is included in an Official Plan. For the CPPS to be an option for local municipalities, it must be built into the Official Plan. In addition to the benefits identified that would attend any CPPS, inclusionary zoning can be used when a CPPS that is applied through an order by the Minister of Municipal Affairs and Housing.

OUR ADVICE

As recommended in section 3.1 and 3.5, the County should adopt a County-wide vision for settlement areas and apply targets that will increase the supply and affordability of housing. This would provide a clear direction and a foundation of local municipal planning innovation that could serve as a primary tool for addressing many of the challenges raised by stakeholders in interviews. It would create new arenas for productive local municipal-County collaboration to improve the quality of life and economic environment for residents and businesses.

The County should apply local municipal density targets which would reflect population allocation, developability, future transit provision, and existing conditions. These targets should be negotiated with local development community members, the public, and key stakeholders including housing providers and other community advocates. The result should be ambitious but reasonable development goals that are sensitive to the market conditions of Bruce County but also aim to help drive development into new markets.

The County should introduce a made-in-Bruce community planning permit system that focuses on heritage preservation and new housing. This would provide new opportunities for county-local municipal cooperation on fine grained planning matters and could unlock additional planning tools that are at the discretion of the province (e.g., inclusionary zoning is permitted in a CPPS area if ordered by a minister).

As a house-keeping measure, Bruce County should support local governments to bring in policies that would lay a foundation to implement the province's new community benefits charge. This replaces the previous "Section 37" density bonusing regime and helps single and lower-tier municipalities recover the capital costs of growth related, locally determined services for higher density development (10 or more units and 5 or more storeys). Though not appropriate for all of the County, this framework could help encourage increasing intensification and residential densities.

3.7 Indigenous Community Engagement

WHAT WE HEARD

County staff have already begun an effort to build strong relationships with representatives of First Nations and Métis communities with Rights and interests in the County's geography.

County officials are eager to continue building on this effort. Due to disruptions arising from the COVID-19 pandemic StrategyCorp was unable to engage directly with Indigenous community representatives in this process. County staff expressed the view that Bruce County's Official Plan update initiative and drafting of policies should reflect input of the Saugeen Ojibway Nation, Métis Nation of Ontario and Historic Saugeen Métis. What follows are some resources and advice based on our past practices and are not intended to replace direct engagement with those communities.

Bruce County already has had productive, ad hoc engagement with its Indigenous neighbours, most recently on the Cultural Action Plan (CAP)/Archeological Management Plan (AMP). But staff see there is an opportunity for more frequent, more effective, and more empowering engagement that can be enabled through the Official Plan update.

The Provincial Policy Statement clearly directs that planning authorities and relevant proponents are required to appropriately engage with Indigenous communities. The basis of this thinking is not new, but updated language emphasizes the need for engagement when considering land use planning specifically.

- *1.2.2 Planning authorities shall engage with Indigenous communities and coordinate on land use planning matters (emphasis added).*
- *2.6.5 Planning authorities shall engage with Indigenous communities and consider their interest when identifying, protecting and managing cultural heritage and archaeological resources (emphasis added).*

Before engaging, Bruce County needs to do all its homework. In previous engagements with other Indigenous communities StrategyCorp has been asked to learn about the Treaties and historic relationship Indigenous peoples have to the land and issues being discussed before meeting.

Over the last decade the Province has made it clear that it is of the view that municipalities must engage effectively with Indigenous communities on issues that may impact their Rights or interests. In its recent release of the PPS 2020 the Ontario government strengthened policies relating to Indigenous engagement, such that planning authorities are required to engage with the province's Indigenous communities.

Bruce County should focus on building strong, trusting relationships with communities because it is as essential as it is rewarding. Identifying what must be done to make a project work and ensuring its



Figure 3 – Map of Saugeen Ojibwe Nation provided by Bruce County staff, for illustration purposes only

compatibility with Indigenous perspectives from the outset will reduce the risk of delays, redesigns, litigation and all sorts of other issues that can result in avoidable delays. Finding ways of collaborating with Indigenous communities can make Bruce County stronger while reducing risk and unnecessary conflict.

WHAT OTHERS ARE DOING

Grey County has the most extensive Official Plan policies related to Indigenous engagement. It provides readers with some context for the historic and continued presence of Indigenous peoples on the land that is now Grey County (though it should be noted that the Métis Nation of Ontario is not a First Nation):

Grey County Official Plan Policy 4.4.6 Public Engagement and Notice for Neighbouring Municipalities and First Nations Communities

- *Within Grey County there are several Indigenous populations that have traditional territory: Six Nations of the Grand River, Métis Nation of Ontario, Historic Saugeen Métis, Huron-Wendat, Beausoleil First Nation, and Saugeen Ojibway Nation. This Plan encourages collaboration among the Indigenous People's in Grey County to work towards a shared vision of land policies and current practices. We want to acknowledge the cultural differences but identify the possibilities of working together.*

It appears to be up to date with the more direct instructions that planning authorities, particularly upper-tier municipalities which have the authority to approve land use planning decisions, shall engage with Indigenous communities. Grey County also includes encouragement for its local municipalities to do the same.

4.4.6

- *County planners and County Council will engage First Nations and Métis for all Grey County Official Plan amendments, local official plan or secondary plan amendments and plans of subdivision or condominiums. Local municipalities are also encouraged to set up arrangements to engage with First Nations and Métis on local Planning Act applications for matters of mutual interest and concern.*
- *The Saugeen Ojibway Nation and Six Nations of the Grand River must be consulted about those lands identified in Appendix C and for other Planning Act matters if requested. The Saugeen Ojibway Nation is preparing a study for traditional interior routes, former settlements and land uses. This study will be considered once it is available. Appendix C does not constitute part of this Official Plan.*
- *When Grey County initiates an Archaeological Management Plan, the identified First Nations and Métis groups will be notified and invited to participate in the process.*

It also provides specific encouragement to engage with Indigenous communities on multiple planning processes. Grey County also points to the importance of collaborating with Indigenous communities on economic development matters which is again unique among comparators.

3.2 Economic Objectives

9) Encourage and promote opportunities to work with the First Nations and Métis in seeking mutually beneficial and socially and environmentally sustainable economic development opportunities.

Finally, in policy 4.5.2 Grey County also directs development proponents and archeologists to consult with First Nations and Métis communities when their archeological resources are discovered and to be preserved on site.

- *Where First Nations and Métis groups significant archaeological resources are to be preserved on site, the proponent and the consultant archaeologist must consult with the appropriate First Nation to identify approaches to commemorate the site.*

Northumberland County and Huron County appear to align with PPS requirements to engage with Indigenous communities on archeological matters. Only Northumberland has articulated the newer requirement to engage on land use planning matters has not yet been articulated locally.

Northumberland County Official Plan F8: Public Participation and Consultation

C) The County will consult with First Nations on applications that will have the potential to affect on aboriginal treaty rights and aboriginal interests

Simcoe County and Wellington County have little to no mention of engagement with Indigenous communities in their Official Plans.

OUR ADVICE

Engagement with Indigenous communities is unlike any other consultation process. If approached correctly, it will enhance the planning process and strengthen the County's relationship with its Indigenous communities. In our experience, most Indigenous communities want to be partners with their neighbouring municipalities, a strong consultation process is the way to build these partnerships.

While it is an important first step to ensure Bruce County's Official Plan is in line with provincially mandated directives, there is room to go beyond these requirements as laid out by municipal best practices.

Proper Indigenous engagement requires research, patience, and time to foster lasting relationships built on trust. The Ontario Professional Planners Institute (OPPI) and the Association of Municipalities of Ontario (AMO) agree that municipalities should approach Indigenous engagement with an understanding of the histories and treaties of the lands in their communities and should provide time to understand the experiences of Indigenous peoples. Like other forms of engagement, there should also be a focus on ensuring consultation sessions are welcoming to all community members regardless of age or gender.

To build trust, focus on giving Indigenous community representatives the opportunity to decide how they would like to participate in statutory consultation processes. Asking stakeholders to identify the best way to work with them reinforces that the County is coming from a position of partnership and collaboration. It also mitigates the risk of running into barriers that would otherwise delay or inhibit the consultation process.

The County should keep the lines of communication with Indigenous leaders, service providers, and political organizations open beyond the mandatory consultation process. According to AMO, doing so

will allow for issues to be dealt with proactively as they come up rather than waiting for a collection of issues to build up over time leading to resentment and a breakdown of relationships.

3.8 Creating an accessible, inspiring document

An Official Plan is a policy document that outlines a municipality’s land use planning policies and outlines a vision for the future long-term growth of a community. It is often the primary document used to establish policy goals. However, they are documents that must stand up to scrutiny and provide certainty in legal settings. Therefore, there is often a tension between the “visionary” aspect of official plans, that is best expressed in lay language, and the “rule setting” aspect of official plans, that is best expressed with legal precision. When the balance between these two aspects lies too far to the legal, the visionary and policy aspects often become less accessible to those outside of planning and legal professions. Building off the feedback we received from stakeholders, and our experience working in other communities, the following emerged as themes for the form the official plan:

- The plan should speak to the people and businesses of the County
- Policies and their intents should be explained in plain language as much as possible
- The final document should be well organized and more accessible to multiple audiences

“If plans are imaginative and offer compelling courses of action that inspire people to act for the common good, then they have greater potential to change attitudes and beliefs and encourage civic engagement.”

Gene Bunnell & Edward J. Jepson Jr. (2011)

3.8.1 The plan should speak to the people and businesses of the County

WHAT WE HEARD

Stakeholders have commented that the review of the Official Plan is an opportunity to reframe the communication of key planning principles in form and content that is more accessible to public audiences.

WHAT OTHERS ARE DOING

Overall, the comparators are similar in their approach to their Official Plans, with the documents acting primarily as a policy document for planners, and less as a document that is approachable and engages the reader in future scenario building for their community.

Grey County offers an interesting approach to their Official Plan policy, by aligning it to the guiding vision of their strategic plan “to be the place where people feel genuinely at home and naturally inspired – enjoying an exceptional blend of active healthy living and economic opportunity”. Grey County’s Official Plan is then built around five main themes to center the approach of the plan and achieve its vision. These themes include Cultivate Grey, Develop Grey, Natural Grey, Live Grey, and Move Grey.

OUR ADVICE

An Official Plan is more than just a technical planning document. It is the roadmap that guides the development of communities, gives effect to goals, facilitates growth, and inspires innovative community

building. To do these things effectively, an Official Plan must speak to the residents and businesses in the communities it governs.

Grounding the goals and visions into scenarios for the future will help readers better understand planning policies. In our experience, stakeholders are more likely to adopt changes or new ways of thinking if they can more comprehensively understand the reasons behind policies and their outcomes.

The scenario building model can also support the envisioning of future outcomes. Presenting alternative scenarios (such as the repercussions of a lack of response to climate change) reminds residents and local officials that actions taken or not taken, can have major impacts on future outcomes. By highlighting the “what if”, this strategy helps drive civic engagement on County priorities.

Future oriented policies guide an awareness of interconnectivity and helps better outline the steps towards the implementation of complex policies. This is an important factor in ensuring the Plan is accessible and requires little additional explanation from planning staff.

Building a narrative is a persuasive way to speak to County stakeholders through the Official Plan. Outlining the County’s vision and telling the County’s story in a way that appreciates the past, acknowledges the present, and defines what is possible in the future will draw the reader into the Plan and works towards building buy-in on the outcome of the Plan.

3.8.2 Policies and their intents should be explained in plain language as much as possible

WHAT WE HEARD

Stakeholders commented the Official Plan has an opportunity to be designed with a focus on accessibility through non-technical language. Through our interviews, many commented that due to the technical and legal language of the Plan, it was difficult to understand without a related background. This made using the document difficult, particularly as a reference document.

WHAT OTHERS ARE DOING

Overall, the comparator municipalities employ a similar approach for their official plan documents as Bruce County did in 1997, particularly in the reliance on technical language. Plans were written with specific planning and “legalese”, diminishing the readability and the accessibility for residents.

OUR ADVICE

Official Plans have historically been daunting for the average reader because of the highly technical planning jargon often used throughout the document. However, Official Plans developed more recently (e.g. City of London, and the City of Abbotsford) are designed to contain the technical details necessary to function as a guiding planning document while also using plain language to welcome non-planning audiences. This is also seen in the explanatory and plan language text of the Grey Official plan which is written so that an average reader would understand the purpose of a policy but is backed up by clear policy language in a more traditional planning policy format elsewhere.

Write the Official Plan in plain language for all to understand. Ultimately, more people interacting with a municipality's Official Plan will result in a smoother planning process, less work for Planning staff, and a community unified by a common vision. Getting residents to interact with an official plan will give them a deeper understanding of what their neighbourhoods and properties are zoned for so there will be less conflict when new developments come up or when they are looking to make changes to their properties. Similarly, developers will be more likely to understand what is possible on certain sites meaning they will need less explanation from staff and will submit more compliant applications.

Complicated policies or concepts should be supported with a descriptive section that introduces the policy, explains its importance, and outlines its relevance to the overall vision for the County. An official plan should not shy away from taking the necessary time and space to help readers understand technicalities and dense subject matter. It can also include a Glossary of important terms to ensure further clarity.

Crafting a document that is simple to understand will bring residents into the planning process by stating how policies will affect their communities and shape the future of their neighbourhoods. Planning best practices indicate that, "A clearly organized and well-presented Plan is readable, user-friendly, and, above all, relevant to the needs of the community (Bunnell and Jepson 2011; Norton 2008; Stevens 2013).

3.8.3 The final document should be well organized and more accessible to multiple audiences

WHAT WE HEARD

Stakeholders commented the Official Plan should be designed with primarily visual and attractive graphics in order to attract a broad audience. Through our interviews, many commented that the Official Plan is a text-heavy and jargon-laden document that could be more easily understood through changes to layout, appearance, graphics and plan language.

WHAT OTHERS ARE DOING

The comparator municipalities' official plans are similar to Bruce County in their appearance and how they are organized. The municipalities appear to have determined early on that that official plan will be a text document primarily used for those within the planning field and their design is meant to describe complex policy concepts and details, not to increase public understanding or engagement.

A text document, with limited font uses and heavy walls of text are overwhelming to the average reader. In order to engage residents, a descriptive graphic should be used wherever possible.

The London Plan is considered to be one of the leading examples of accessibility and readability in Canadian Official Plan policy. It emerged from a two year consultation process with London residents on their future vision for the City of London, Ontario, called ReThink London, one of the largest engagement process for an Official Plan in Canada, with over 20,000 Londoners participating in more than 80 information sessions and workshop events. Part of a key consideration for the public engagement of the Plan, was shifting the narrative of what an official plan could be. The shift involved taking a public policy document that was traditionally a ‘planner’s plan’ into a ‘people’s plan’.

“We wanted to focus of this plan to be one for the people, that anyone in the City of London could pick up, read and enjoy”

Unattributed London Planner, 2016

The London Plan was designed to be both readable in the content, and the graphic design of the document itself. It was designed as a “coffee table” book, that residents would want to read. From the beginning, the process entailed ensuring that the document was one that would be inspiring for current and future residents. The document uses concise, and clear language to tell the story of major policy moves, why they are important to the city’s future, and actionable steps on how to achieve this goal.

The Official Plan policy sections have familiar titles and section headers as other Official Plans but differ in how each section is laid out in a narrative format, detailing the major ‘What, Why and How’ of major policies move. The language used to explain the policy section is designed to connect the reader to the policy moves, by plainly explaining the policy, it’s connection to the City of London and it’s residents, and how it can be achieved. The language is approachable, so that residents and planners alike can understand the intent behind the policy.



RETHINKING LONDON

1. Throughout our history, Londoners have responded to challenges with key decisions that have shaped our community into what it is today. How can we all prosper? How can we attain an exceptional quality of life? How should we grow? Where will new investment come from? How can we protect what is most important to us? How should we expend our resources?
2. London is on the cusp of a new chapter in its history where these and many more questions are again being confronted by its residents. For two years, thousands of Londoners participated in the ReThink London process – a widespread community discussion which, at its core, focused on the fundamental question “what kind of city do we want to live in 20 years from now?”
3. With dozens of alternative ways to participate in this process, Londoners of all ages and lifestyles attended over 100 ReThink London events, responded to surveys, chatted on social media, provided their opinions and engaged their families, friends, work colleagues, and fellow residents in this city-building discussion. In doing so, Londoners collectively developed a vision for their future – one that they aspire to achieve by the year 2035.
4. This Official Plan – The London Plan – emerged from this community conversation to set new goals and priorities and to shape the growth, preservation, and evolution of our city over the next 20 years.

by Looon...

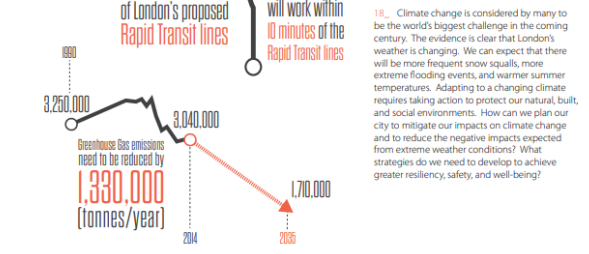
AFFORDABILITY CHALLENGES



PROTECTING OUR FARMLAND



CLIMATE CHANGE





Each section within The London Plan is laid out in a clear format including the 'What, Why and How' of the policy. It lists what the policy is, why it is important, and how it will be achieved or implemented. The content grabs the readers attention through the use of contextual graphics, colour, and accessible language.

Forest City

Section header

WHAT IS THE FOREST CITY?

382. London has been known as *The Forest City* since the mid 1850's and we, as residents, are passionate about our Urban Forest. Our geographic location affords London with climatic conditions suitable for growing a wide range of tree species. The Urban Forest is an ecosystem dominated by trees but that also includes other vegetation, soil, water, and wildlife as integral components. It transcends public and private ownership and consists of both individual and groups of trees in environmentally significant areas, parks, wetlands, woodlands, plantations, riparian areas, ravines, fields, along boulevards, and in private yards.

Explaining the context

383. As of 2008, there were over 4.4 million trees within the Urban Growth Boundary, approximately 3.3 million of which were on private property. There were another estimated two million trees outside the Urban Growth Boundary in the rural areas of London, mostly in private woodlands.

384. All of the trees and associated vegetation within London's boundary contribute to our Urban Forest. This includes trees within the Urban Growth Boundary and within Rural London.

385. For those areas of the Urban Forest that are components of the Natural Heritage System, the Natural Heritage policies of this Plan shall apply.

WHY IS THE FOREST CITY IMPORTANT TO OUR FUTURE?

Connecting the reader to the significance of the policy

386. Trees provide the structure and ecological functions for much of our Natural Heritage System and the ecosystems within it. They stabilize slopes and replenish our soil with biodegradable materials. They provide the aesthetic context for our recreational infrastructure, such as tree-lined pathways, parks, and golf courses. They provide functional and pleasing streetscapes, back yards, and site development features for every type of use. They create the context for great places.

387. Trees mitigate the impacts of climate change by reducing greenhouse gas emissions and providing shade, which cools us personally and reduces the energy required to cool our buildings. Trees improve air quality by absorbing pollutants and by producing oxygen. They give us spiritual well-being and an over-all higher quality and longevity of life. Trees improve watershed health by controlling water movement above and below the ground, thereby reducing erosion and surface runoff and improving water quality. Trees increase property values and provide an economic stimulus in commercial areas. Trees benefit not just the owners of the property on which they are located, but all of society.

388. The Urban Forest is integral to London's identity and overall prosperity. As the Urban Forest is strongly influenced by land use decisions and development patterns, the planning, protection, and enhancement of London's Urban Forest is important for building an attractive, well-designed, and functional city environment. A thriving Urban Forest, such as that which we envision in 2035, will provide residents a healthy, safe, and secure environment while preserving and enhancing environmental, aesthetic, economic, social, cultural, and recreational values. Policies in the Rural Place Type chapters of this Plan also support the preservation, protection, and enhancement of the Urban Forest.

LIFT BUILDING POLICIES FOREST CITY

OUR ADVICE

Text-reliant and heavy use of jargon is out of fashion for most modern official plan documents.

Emerging trends indicate a transition to the use of graphic design, illustrations, and pictures that support a more visual and accessible document.

An official plan should be thought of as supporting the marketing of the County to residents, businesses and visitors. It should be designed according to the County's branding and should fit into the overall strategy behind how the County wants to be viewed.

Good design will support the specificity of policy content needed to inform planning intent and decisions. Most people are visual learners who benefit from having complex concepts explained with a combination of words and pictures. The strategic use of diagrams and images will communicate the messages in the Official Plan more effectively.

Document layout best practices including easy to read fonts, the use of colour, headers, and white space should all be considered when drafting an Official Plan. Official Plans are substantial documents that can be difficult to navigate and get through. Making it easier for the eye to focus on bodies of text and wayfinding elements like headers are important features of accessible documents.

Appendix: Summary of Recommendations

Link the diverse areas of Bruce County in a coordinated planning framework

1. Policies should create coordinated Countywide planning approach for settlement areas and hamlets, while remaining sensitive to local contexts.
2. The Official Plan should have increased specificity on growth management policies designed with local municipal input.
3. The new plan should provide flexibility to respond to unforeseen shifts in population growth and send market signals of where it may choose to expand if a substantial and unforeseen increase in demand arises and cost-effective municipal servicing permits.

Supporting Agriculture and Agri-Business

4. Bruce County should use an agricultural system approach to plan for its agricultural communities, including the use of Agricultural Impact Assessments.
5. Clear the path for modest increases in on-farm housing to support farmers in every stage of life.
6. Provide for modest increases in on-farm housing to support farmers as they age.
7. Clarify permitted uses and provide maximum flexibility for agriculture-related and on-farm diversified uses.

Focusing on flexible planning policies and tools that are up to date

8. Include provisions to help local municipalities keep planning documents in conformity with the County.
9. Consider a more unified Official Plan framework to ensure consistency.
10. Ensure that modern policies prevail when there is conflict with local plans that are out of date.

Climate Change

11. The anticipated impacts of climate change on the County's local environment should be illustrated in the plan.
12. Work with local conservations authorities to identify economic and environmental hazards resulting from climate change.
13. Include measurable goals to mitigate and adapt to climate change.

Addressing Transportation

14. A stronger role for the County in planning for, implementing, and maintaining a regional transportation network.
15. The County should consider adopting policies in its official plan that would establish a mobility-based transportation planning which includes transit and active transportation.
16. Consider implementation of “steps” to a transit network as Innisfil has done.
17. Ensure provisions exist in the new official plan to support more efficient use of existing transportation resources.
18. The County should consider active transportation corridors as a means of linking communities and settlement areas together while providing alternatives to private vehicle use.
19. The new official plan should put in place some of the land use building blocks required for the county to one day implement a transit system.

Addressing Housing

20. Apply intensification and density targets for local municipalities according to population allocation, land supply, future transit provision, and existing conditions.
21. Introduce a community planning permit system focused on heritage preservation and new housing.
22. Support local governments to bring in policies that would lay a foundation to implement the province’s new community benefits charge.

Indigenous community engagement

23. At the minimum, the County Official plan must be updated to Provincial requirements.
24. The County Plan should go beyond the minimum requirements and should enthusiastically include Indigenous Peoples in the official plan update process.

Creating an accessible, inspiring document

25. The Official Plan should be written with a narrative that it speaks to the context of the residents and businesses within the County.
26. Policies and their intents should be explained in plain language as much as possible.
27. The final document should be designed to be a visual document.