



The Corporation of the Township of Huron-Kinloss

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May 26, 2021

Jack Van Dorp
Manager of Land Use Planning
Planning and Development
Corporation of the County of Bruce

Greetings Mr. Van Dorp,

Re: Bruce County "Additional Residential Units" Official Plan Amendment C-2021-015

On behalf of the Township of Huron-Kinloss, I am providing comments on the proposed amendments to the Bruce County Official Plan to allow for Additional Residential Units. (ADUs). As you have mentioned, this amendment will set the stage for future changes to our local planning policy and we want to ensure we are still able to implement Huron-Kinloss specific solutions to the housing affordability issue

The Township of Huron-Kinloss recently updated our Local Official Plan in 2017 and Comprehensive Zoning By-law in 2018. While these updates predated the recent Planning Act changes implement through Bill 108, our documents include policies specific to affordable housing and permits additional dwelling units in residential and agricultural areas contained within the main dwelling. Council spent a great deal of time consulting with the public and deliberating different options that led them to establish a Huron-Kinloss specific solution to housing issues. The Township would like to ensure local solutions remain supported within the requirements.

Huron-Kinloss has residential areas with either municipal water and sewers present, partial services or no services available. The Township performed a Risk Assessment Study for Continued Development on Septic Systems and determined that there are segments of that settlement area that cannot sustain further intensification. We request that the proposed wording of the amendment will allow the Township to determine areas that may prohibit ADUs based on servicing.

We have taken the approach to allow ADUs through our Zoning By-law where both municipal water and sewers are available. We have also permitted Garden Suites and ADUs on partial services through a development approval if it can be demonstrated that the property can sustain the intensification.

We also recommend that separate policies for additional units within buildings versus those in other buildings be established. Our setbacks for accessory buildings are reduced from those of residential buildings in some areas. This is to recognize that accessory buildings have less nuisance potential than that of occupied buildings; however additional ADU in these buildings may prove otherwise. There are Building Code such as spatial separation that will also have to be examined for these types of units.

In your email, there were several question that you asked us to consider:

- Do 'Garden Suites' (units permitted temporarily for defined occupants) remain relevant if permanent additional residential units are permitted?

Yes, we feel that it would be necessary to keep Garden Suite policies within the Official Plan as there may be some areas where temporary residential accommodations are more suitable than permanent.

- Would there be any different servicing considerations for a garden suite vs a secondary unit that could be permanent?

No, the servicing requirements would have to meet the requirements for residential occupancy regardless of term of use.

- Are suggested lot sizes appropriate for additional residential units on private or partial services?

They seem appropriate but also rely on the municipal zoning by-laws to establish maximum lot coverage provisions for all buildings. There may still be challenges locating all the needed private services on the property if the main dwelling and additional dwelling units are proposed to be of substantial size.

- Are suggested directions for Rural Recreation and Agricultural areas reasonable to address planning considerations in these areas?

They may be reasonable for areas that have not considered ADUs in in the Rural Recreational and Agricultural Areas in their own local policies. Huron-Kinloss has already developed local policies for these areas and would like to have them preserved.

The Township appreciates this opportunity to comment on the proposed amendment to accommodate Additional Dwelling Units within the County. We encourage you to look at the policy approach that Huron-Kinloss has already established and form your County in amendment in a manner that will allow the lower tier municipalities some freedoms to institute their own local solutions.

Sincerely,

Matt Farrell
Manager of Building and Planning/CBO
Township of Huron-Kinloss

CC Mary Rose Walden, CAO, Township of Huron-Kinloss

Jack Van Dorp

From: Jay Pausner <jay.pausner@saugeenshores.ca>

Sent: Tuesday, June 29, 2021 4:23 PM

To: Jack Van Dorp

Subject: FW: Additional Residential Units

**** [CAUTION]:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Town staff have reviewed the noted amendment and provide the following comments:

Our Attainable Housing Task Force recommends additional dwelling units in both urban and rural settings. We are pleased to see the amendments generally permissive in this regard. However, as the amendment stresses ARUs in urban locations, Rural Recreation and Agricultural designations, Saugeen Shores staff want to confirm/clarify that ARUs would also be permitted in the Rural designation with the same restrictions applied as in the Agricultural designation. We see the permitted use in the Rural designation but do not see it stressed in the General Housing Policies.

Under section 4.4.4.2.5

Town staff recommend changing the words accessory apartments to accessory dwelling units. Alternatively, perhaps another phrase to encompass all sorts of dwelling unit types (not just apartments or ARUs per se).

Section 5.2.2.4

Recommend adding for clarity that ARUs are required to be permitted in Primary Urban Communities in local official plans

Town staff also recommend the following for additional clarity:

-nothing in the amendment precludes a local municipality from developing policy which would facilitate the creation of more than 2 ARUs on a property or that the ARUs may be located in any combination within a principal dwelling or ancillary structure. (In other words, 2 ARUs could be located in a principal dwelling and 1 in an ancillary structure provided in xi)d) are appropriately satisfied.)