

SENT BY EMAIL TO: planthebruce@brucecounty.on.ca

3 October 2022

Mr Jack Van Dorp, Manager -- Land Use Planning
Mr Daniel Kingsbury, Senior Policy Planner
Members of the Plan the Bruce Committee
County of Bruce
Walkerton, ON

RE: OFFICIAL PLAN REVIEW PHASE I:
AMENDMENT TO THE OFFICIAL PLAN

Dear Mr Van Dorp, Mr Kingsbury, and Members of the Plan the Bruce Committee,

I am writing in response to the request from Plan the Bruce for comments on the proposed amendment to the County's Official Plan.

Firstly I am concerned about the deletion of section 4.4.2 which reads as follows:

4.4.2.5. Growth is important to the future of the County and its municipalities; however, it must be managed in a way that will minimize adverse impacts on agricultural and heritage features, take into consideration the availability of appropriate types and levels of services and implement the goals and objectives of this Plan. (p. 21).

I believe that the phrase "minimize adverse impacts on agricultural and heritage features" should be retained in the amended Official Plan because I have been unable to find any language with comparable policy direction.

Secondly, as I pointed out in my comments during the Virtual Open House on Sept. 29 the pared down list of "Guiding Principles" is lacking in the definition and detail that would make those "Guiding Principles" meaningful and useful. I am particularly concerned with Principles #1 and #7, which are explained more fully in the *Bruce GPS Final Report* (under the subheading "We heard from the community").

Immediately following below I have highlighted (in red) some of the words and phrases that appear in the *Bruce GPS Final Report* that I would like to see incorporated into amendment under Section 3.4.1. “Guiding Principles:”

Guiding Principle #1: To put growth in the right locations with the right services. We heard from the community that: • **It is important to manage growth and development to preserve the character, look, and feel of small towns**, and beauty of the natural environment, while still allowing for growth and development that will enable people to make a decent living within the County; • **We need to ensure growth is managed to minimize impact on the “look” of towns, traffic and crowding, historical structures**, the natural environment, and farmland; and • The vision for the future should include enough infrastructure to support growth.

Guiding Principle #7: To identify and manage our cultural heritage resources. We heard from the community that: • **It is important to protect the County’s cultural heritage resources, including historic buildings, and scenic streetscapes and views**; and • Our cultural heritage resources contribute to **preserving our identity**; support tourism, which spreads wealth within the local economy; and ensure people’s sense of belonging in our economic future.

My concerns are summarized as follows:

1. The proposed Amendment to the Bruce County Official Plan, section “3.4.1 Guiding Principles” lacks the explanatory detail that appears in the [Bruce GPS Final Report](#).
2. As there is nothing in the Official Plan amendment to provide anyone with an understanding of the depth and breadth of each “Guiding Principle,” the true meaning of those Guiding Principles is destined to be lost and unavailable to anyone trying to apply these principles in an effective and practical manner.
3. Who would understand what is meant by Guiding Principle #1, which states that growth must be placed in the “right” places? “Right” is a subjective value judgement that needs to be qualified or explained. Without explanation the guideline is utterly useless.

4. Who would understand what is meant in Principle #7, pared down as “To identify and manage our cultural heritage resources?” The language that needs to be added to give meaning to this Guideline is that cultural heritage resources need protection and that “cultural heritage” is meant to include “historic buildings, and scenic streetscapes and views.”

5. The amendment appears to encourage all kinds of growth development with little restriction, except where infrastructure and services are lacking. Given that there are clauses in the amendment with wording that clearly specifies that a lack of services is a consideration that would impact development, why is there no wording to the effect that minimizing impact on heritage and character is a consideration when planning development projects? Growth and development should be allowed only when it will have a minimal or negative impact on built heritage and the character of a community.

6. At the Virtual Open House I heard Plan the Bruce organizers tell participants that “the detail” would be added by the Municipalities, when amending their own Official Plans, design guidelines, and such. However, this is not necessarily the standard practice. At the municipal level the lack of specific wording in the County’s Official Plan is justification for inaction. For example, a Municipality that sees heritage preservation as an impediment to development is likely to use the lack of policy direction in the County’s Official Plan as an opportunity to respond to preservationists that (e.g.) “The County’s OP does not specify anywhere that the municipality must conserve heritage streetscapes and views.”

7. Item 4.4.2 (quoted from the amendment below) is an example of one amendment clause that identifies the need to protect agricultural land and the need to provide stewardship of the natural environment. “4.4.2. Manage growth in an efficient, orderly, and sustainable manner that provides housing and employment opportunities, while protecting agricultural land, continuing to steward the natural environment, and maintaining or enhancing public health and safety.”

--- However, as noted above, there needs to be a parallel statement to the effect that the community must, for example manage growth ... while minimizing impact on the “look” of towns, traffic and crowding, historical structures.

--- And, similarly, there needs to be a statement to the effect that growth should be managed with respect and protection for the County's cultural heritage resources, including historic buildings, and scenic streetscapes and views

I hope that you will take the above concerns into consideration.

Sincerely,



Sheila Latham, MLS, PhD
Southampton

Cc Linda White
Southampton Cultural Heritage Conservancy