From: <u>Cuesta Cuesta Planning</u>
To: <u>Monica Walker Bolton</u>
Subject: Bruce County Official Plan

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Hi Monica,

I have had a brief review of the various staff recommendations on the Implementation Policy and would make the following comments and suggestions. As I noted in our discussion, I will also try to comment on the overall Plan at a later date.

- 6.2 The Indigenous communities have become more interested and involved in land use planning in the County and it would be helpful to have a more formal protocol that incorporates the Indigenous communities into the County planning process.
- 6.9/6.11 With regard to local and secondary plans, you should consider incorporating these plans into the County Plan, thereby simplifying the process. This would assist in reducing duplication in the process.

I will review other areas of duplication that would be helpful in creating an efficient planning approval system when the overall Official Plan is reviewed.

- 6.21 5. When original Township lots are recreated, widening requirements for an owner can be extremely costly and the policy should provide a cost sharing option.
- 6.25 2. & 8. The term pre-consultation should be replaced with consultation or pre-submission consultation.
- 6.25 7.b. Where peer reviews are deemed appropriate for an application, the person paying for the review should agree to the peer reviewer being retained. Where applications have been peer reviewed by another government agency or ministry, no peer reviews are required.
- 6.27 4. b. Intensification targets for housing must be applicable and "feasible".
- 6.27 5. h. On low volume streets, right of ways should be reduced to reflect actual use. Municipal services should be reexamined to minimize costs but still provide an acceptable level of service (i.e why sidewalks on cul-de-sacs).
- 6.28 3. There should be an option for an agreement for road upgrades if deemed acceptable to the Municipality.
- 6.28. 11. No non-farm residential lots should be permitted within 300-500 metres of an existing licenced area.
- 6.31 7. Severances for agriculturally-related uses should be required to demonstrate that the use cannot be located in or adjacent to a settlement area.
- 6.31 8. e. Appropriate clarification.

On the matters of creating rural non-farm residential i.e when lots, in the Agricultural or Rural Areas, only consents for an existing residential use, i.e surplus farm residences, should be permitted. As a condition of approval, a stipulation should be attached to the deed of the severed parcel advising of agricultural aggregate or some other legitimate rural use occuring in the area.

6.32 This policy should not be different from the agricultural policy. I did not see any research on the number of existing rural lots that can be used for urban housing in the countryside. There appears to be no consideration of Need. The LEAR study appears to create a greater amount of "Rural Areas" which will create additional potential for urban lots in the countryside.

In the preparation of the update, how much research was done on the economies of urban development in Rural and Agricultural Areas? As well, was the nuisance factor which accompanies urban lots outside of urban areas considered?

- 6.34 If a lot is being created for open space purposes, why the 20 hectare minimum lot size?
- 7.3 4. The boundaries of settlement areas should follow natural or manmade features and not property boundaries. Consideration should be given to basing boundaries on other than property boundaries. The Official Plan is a policy document, not a zoning by-law.
- 4.7.3 1. The County needs to step up and develop a County waste management system.
- 4.15 What is the point of repeating Niagara Escarpment Plan policy? To limit duplication, define the NEC area of jurisdiction and direct all development interests to the Niagara Escarpment staff.

Thanks Monica,

Don

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