

December 6th, 2023

County of Bruce

Attention: Monica Walker-Bolton, Senior Policy Planner

Comments on Bruce County Official Plan Implementation Amendment C8

Generally I recognize that an extensive amount of work has gone in to streamlining, clarifying and updating the policies. Please accept the following comments you're your consideration.

1.0 Format

I note that some policy sections are not identified as separate subsections but rather just paragraphs, ie. Section 6.5. I suggest that without ease of reference this could prove problematic when referencing in documents. I do think the existing plan showed subsections clearly.

2.0 Policy Amendments

a) S19 Section 6.7 Non-conforming Use

- It may be advantageous to explain both legal non-conforming use and non-complying structures
- The current policy appears to not allow an increase in height, size, etc except in natural hazard areas where height and volume may increase under certain circumstances. Both appear to be able to be varied by the Committee of Adjustment. Is this the intent?
- It may be advantageous to separate the hazard area and general policies. This could be similar to the policies on Agriculture and Rural designations.

b) Section 6.15 Holding Provisions

- I support the inclusion of clearly spelled out criteria and suggest subsection 4 be amended to clarify whether a, b & c are mandatory or just examples of the criteria to be considered. Perhaps "~~The standard~~ most common criteria for removal of a "H" would be, 'but are not limited to':". While giving guidance it does not limit the criteria which could be applied.

c) Section 6.16 Community Planning Permit Systems (CPPS)

- This could be helpful in streamlining if everyone is on board. Are the Conservation Authorities in agreement with the CPPS process?

d) Section 6.21 Site Plan Control

- Does the provincial policy in regard to multi-resid affect this?

- Not all of the SPC policies in the existing OP are bad, they give municipalities and landowners/proponents guidelines. I understand the proposal reduces verbiage however this may be a place where guidance will be advantageous for all involved in the development process.
- e) Section 6.25 subsection 6
- suggest that 'must' be changed to 'should', some proponents are more capable or knowledgeable and could provide appropriate documentation. Some proposals are more simple than others. Leave flexibility so staff have discretion.
- f) Section 6.31 subsection 6a – Ag lot severance
- I question the requirement to show availability of an alternate lot/site is impractical noting factors such as cost, availability, proximity to existing business, suitability of soils, often as defining options.

These comments are provided for your consideration and should you wish to discuss or have clarification please feel free to contact me.

Respectfully submitted Bev

Bev Nicolson, MSc, RPP
519-374-4670
Banicolson2018@gmail.com