



May 2, 2024

**By Email:** [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)  
Provincial Land Use Plans Branch  
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## **RE: ERO Posting 019-8366**

Thank you for providing the opportunity for the County of Bruce to comment on ERO Posting 019-8366 which seeks input on reducing barriers to additional residential units through the Environmental Registry.

Bruce County and our eight local municipalities are committed to supporting the province's goals to increase housing supply, bring more affordable housing to market and streamline the development process to get more homes built faster.

Bruce County delivers planning services to our eight partner municipalities and delivers a range of housing services, including the construction of County owned/operated housing.

Throughout the recent changes to the Planning System, Bruce County and its partner municipalities have been advancing initiatives to increase the supply of affordable housing by updating planning documents including focused amendments to the County Official Plan, local Official plans and zoning by-laws to facilitate additional residential units.

Additional residential units provide significant and welcome opportunities for gentle intensification.

Please consider the following in response to the questions posed by this ERO posting:

1. Are there specific zoning by-law barriers standards or requirements that frustrate the development of ARUs (e.g., maximum building height, minimum lot size, side and rear lot setbacks, lot coverage, maximum number of bedrooms permitted per lot, and angular plane requirements, etc.)?

In considering provincewide provisions for ADUs we would suggest that the province consider:

- Provisions for conversion of existing buildings to accommodate ADUs.

- Potential privacy impacts from upper-storey overlook into rear yards of adjacent properties.
- Building code considerations such as setbacks and protected openings to manage fire risk.
- Zoning by-laws in Bruce County do not typically regulate bedrooms per lot except where indicated by hydrogeological studies to support multi-unit developments with onsite private services.
- Existing regulatory gaps related to groundwater quality protection when intensification is proposed in areas with onsite water and wastewater treatment systems.
- Variable stormwater management capacity, particularly in existing neighbourhoods, that could be overwhelmed if provincial regulations are established for lot coverage that exceed stormwater management capacity.

An alternative to provincewide regulations related to Additional Residential Units could be a set of model zoning by-law provisions that could be available to municipalities as a baseline, with an opportunity to establish and make necessary amendments that align with local context. Bruce County would be happy to contribute to a provincial effort to establish a model by-law.

2. Are there any other changes that would help support development of ARUs?

The development charges act does not permit municipalities to collect development charges associated with additional residential units. As such, municipal infrastructure - including water, wastewater, and stormwater management capacity - may be unable to accommodate a full build-out of additional residential units. Funding to support upgrades to existing infrastructure would further unlock potential for additional residential units in existing neighbourhoods.

Bruce County Council and staff appreciate the opportunity to provide input on barriers to increasing supply of additional residential units. We encourage the province to work with groups such as AMO and the Warden's Caucuses, as well as rural and small urban communities to engage in meaningful dialogue on proposed changes and their implications for municipalities across Ontario.

Please contact the undersigned should you have any further questions.

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Western Ontario Warden's Caucus

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