

Subject: BC Draft Official Plan_PWEP comments

To the Bruce County Council, BC Planning and Development Department, and the Municipality of Kincardine

May 22, 2026

Good afternoon,

I am writing to you with regards to the Bruce County Draft Official Plan. The Philosopher's Wool Environmental Preserve (PWEP), as well as the Inverhuron community, have been engaged in the OP review process since it started several years ago. PWEP submitted clear and constructive comments throughout, including an Alternative Land Use Proposal for Inverhuron (see the Land Use page on the PWEP website). We participated in a timely fashion, even following up with the County planning department several times over the past six months in an attempt to get updates and potentially work through any issues, but we did not hear back until last week.

We have now learned that none of our concerns have been addressed in the Draft Official Plan. We are extremely disappointed in this lack of responsiveness to what are, in fact, the needs and concerns of your constituents. Unfortunately it seems that public consultation is merely a matter of checking the box, rather than really listening to the public in order to arrive at sound planning decisions that incorporate local priorities and balance growth with environmental protection.

We are sadly disillusioned by a process that was supposed to give the local community a real say in how Inverhuron is shaped over the coming decades. By allowing such deep discrepancies between the reality on the ground and the planning framework to persist into the new official plan, the County would be setting itself up for decades of tension, the likes of which has already produced, as an example, the ongoing judicial review of the Tidman subdivision proposal in Inverhuron.

Our main concern, shared widely among the Inverhuron community, is that designating historic Inverhuron and the Lakeshore as Secondary Urban Communities will invite intensive development into the area, putting undue stress on fragile natural heritage systems and causing irreversible environmental damage. There are also safety concerns around traffic, pollution, lack of infrastructure, and affordability.

Planning staff recommendations persist in stating that "water and/or sewer services are or can be made available in parts of Inverhuron", and that therefore a Secondary Urban designation is justified; this is putting the proverbial cart in front of the horse, because most of Inverhuron does not have services, nor would it be possible to provide adequate services. We have repeatedly requested that the Municipality of Kincardine and Bruce County produce a

comprehensive stormwater management plan; even if municipal water and sewer could be supplied to Inverhuron at zero cost to current residents, where would the treatment facility for stormwater be located? To invite development on speculation that services will be made available, without even specifying exactly what those services will entail and how they are to be paid for, is not sound planning.

To be clear, PWEF is not anti-growth or development: we believe it is possible to meet the growing housing need through thoughtful, environmentally responsible development by containing development within urban boundaries, making use of existing infrastructure, protecting the integrity of fragile natural environments, being mindful of the interconnectivity of ecosystems, and taking into account the various impacts on the surrounding communities.

We therefore ask Bruce County to reconsider, and to take this opportunity to address PWEF's and the Inverhuorn community's concerns in the new Official Plan.

To summarize, PWEF has made the following requests:

- 1) Boundary adjustment requests to reduce the historic Inverhuron settlement area, and to remove the area south of County Road 15 from the Secondary Urban Community designation
- 2) Request for change of Settlement category for the historic Inverhuron area from Secondary Urban to Hamlet
- 3) Special Policy Area requests

More than a year ago, PWEF had a conversation with one of the lead planners, Jack Van Dorp, and Kincardine Mayor Kenneth Craig, on March 4th 2025 to try and find some common ground. We were pleased to hear that planning staff would work on a recommendation to redesignate the historic Inverhuron Settlement area between Concession 2 and CR15 as a Hamlet. We were also encouraged to hear that the implementation of at least one of the Special Policy Areas we suggested would be pursued through the municipal council after the completion of the BC OP review.

We therefore ask, once again, that at the very least the historic Inverhuron settlement area be designated as a Hamlet.

We also stand by our original request that the area south of CR15 be removed from the Secondary Urban Community designation, and instead be designated as a combination of Rural/ Seasonal recreational, Natural Environment and Hazard lands. Considering that planning staff were open to recommending that Inverhuron north of CR15 be designated a Hamlet, it would follow that the area south of CR15, which has significant natural heritage features unsuitable for development and also fewer services, should not be designated as a secondary urban community. This is especially true since no Capacity Study, Watershed Plan or Subwatershed plan has ever been prepared for Inverhuron, as confirmed by Mr. Van Dorp during the March 4th meeting. Considering that both the PPS (Provincial Policy Statement) and the Bruce County OP require

these kinds of studies where significant development is proposed, or where a settlement area designation is expanded, we don't see how the Secondary Urban designation can be allowed to stand.

We therefore request, once again, that you adjust your recommendations accordingly.

Thank you for your attention to these matters. We look forward to seeing a plan for Inverhuron that respects community priorities and environmental integrity. We are aware that the Public Meeting is to be held on June 18th. How soon after that can we expect a decision from County Council? Please notify us of the decision on the proposed Official Plan.

Sincerely,

Tessa Gerling

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Respectfully acknowledging that I live, work and benefit from the Lands and Waters of the Saugeen Ojibway Nation.