



Bluewater District School Board

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June 3, 2024

Coreena Smith
County of Bruce
Planning & Development Department
11243 MacKenzie Road
Port Elgin, ON N0H 2C6

VIA EMAIL
bcplpe@brucecounty.on.ca

RE: Town of Saugeen Shores Official Plan and Zoning By-law Housekeeping Amendments
L-2024-007 & Z-2024-025
Town of Saugeen Shores

Attention: Coreena Smith,

Thank you for circulating notification with respect to municipally-initiated housekeeping amendments to the Town of Saugeen Shores Official Plan and Zoning By-law. The housekeeping amendments are to address various matters including: conformity with the implementation amendment to the Bruce County Official Plan; introduction of On-Farm Diversification as per the Bruce County Official Plan and Provincial Policy Statement; encouraging intensification and diversification of housing; parking reductions and improvements; Official Plan improvements; and Zoning By-law improvements. In response to the request for comments, Bluewater District School Board (BWDSB) would like to use this opportunity to provide the following comments as they relate to BWDSB's properties.

Official Plan Amendments

Land Use Designations - Schools as Public Service Facilities

Schools, as Public Service Facilities under the PPS, should be able to proceed as a permitted use in all land use designations (except where the sensitivity of the land use will not allow) without the need for an Official Plan Amendment. The provision of educational programming takes many forms and will continue to evolve in the future. Community hubs, experiential learning, outdoor education, and partnerships will shape the delivery and format of schools making the traditional site location and built form only one option. Additionally, the use of "elementary" and "secondary" should not be differentiated; rather, the definition of "Public Service Facilities" should be applied. This is required in order to allow greater flexibility if there was a future need to shift grades between the elementary/secondary panel in facilities.

For those reasons above, staff request that Public Service Facilities be permitted in all land use designations, excluding hazardous lands or heavier industrial areas where the sensitivity of the land use would not be permitted, without requiring an Official Plan Amendment. Other designations where future schools may be needed include the Rural Areas, preferably by way of a secondary planning process.

Child Care

The current Official Plan contains multiple references to "day nurseries". The *Day Nurseries Act, 1990* was repealed and replaced with the *Child Care and Early Years Act, 2014*, and includes a new definition of "child care" that replaces "day nurseries". BWDSB recommends that all references to "day nurseries" within the Official Plan be replaced with "child care" as per the *Child Care and Early Years Act, 2014*.

Residential Designation – Section 3.6

Section 3.6 of the Official Plan provides policies related to the Residential Designation. Section 3.5.3.1 and 3.6.4.3 discuss that “small scale institutional uses” are permitted in the Residential Designation. Relevant to BWDSB, this includes elementary schools. As iterated above, the use of “elementary” and “secondary” should not be differentiated; rather, the definition of “Public Service Facilities” should be applied. This will permit flexibility for the BWDSB if there was a future need to shift grades between the elementary and secondary panel in facilities.

Similarly, Section 3.6.4.3.3 states that “large scale institutional uses such as secondary schools... are required to be located in the Institutional designation. In order to align with the *Provincial Policy Statement*, BWDSB planning staff respectfully request that secondary schools, as Public Service Facilities, be permitted in all destinations.

Section 3.6.4.3.2 a) states that new small scale institutional development or redevelopment shall be located on an arterial or collector road. BWDSB planning staff respectfully request the removal of this clause in relation to Public Service Facilities to ensure that future required public schools can be located in the communities they are developed to serve.

Core Commercial Designation – Section 3.10

BWDSB requests clarification for Section 3.10.3, which outlines the Permitted Uses of the Core Commercial Designation. Currently, “community facilities, [and] public uses” are permitted in the Core Commercial Designation. It is not clear if schools, as Public Service Facilities, fall under the community facility or public uses permitted.

Standardization of schools as Public Service Facilities, permitted in all land use designations without an Official Plan Amendment, would clarify the Official Plan and align the Plan with the policies of the PPS.

Institutional Designation – Section 3.17

Specific policies relating to Institutional uses are provided in Section 3.17. The purpose of this designation is to “recognize existing institutional lands”. Bluewater District School Board planning staff recommend that the word “existing” in that sentence be deleted in order to recognize potential future required new school sites in the community.

As previously discussed, the differentiation in Section 3.17.4.2 between “elementary” and “secondary” schools should be removed and the definition of Public Service Facilities used instead in order to permit flexibility for the board should elementary or secondary panel needs change. Elementary and secondary schools should be permitted in the Residential designation without additional planning applications.

Complete Application Requirements and Preconsultation – Section 6.3

BWDSB would recommend adding a “Public Service Facility Needs Assessment” as a supporting study that may be required as part of a complete application in Section 6.3.4. This will ensure that proposed residential development must consider the adequacy of schools in the community. BWDSB planning staff would also recommend including this study in Section 6.23.3 in relation to requirements for Secondary Plans.

Zoning By-law Amendments

Parking Regulations – Section 3.24

Currently, parking for secondary schools requires:

8 spaces per classroom, plus either 1 additional space per office or, if the school contains a place of assembly, parking spaces as required for place of assembly, whichever is greater. Education facilities with a gymnasium and/or auditorium may utilize hard surface play areas to meet such additional parking requirements provided such hard surfaced areas are adjacent to and have direct access from the required parking areas.

Bluewater District School Board is highly supportive of the proposed housekeeping amendment to reduce the number of required parking spaces for secondary school uses from 8 to 4 per classroom, as this will enable BWDSB to more efficiently use land and infrastructure.

Bluewater District School Board planning staff note that Section 3.24.7 describes provisions for parking location and access. Section 3.24.7 a) provides that when parking is proposed to be provided off-site, the parking must be located in the same Zone as the said lot. Planning staff respectfully request that the provision that the off-site parking must be provided within the same zone be removed for Public Service Facilities; this will better enable cross-sector partnerships where parking can be shared, thus reducing land requirements for parking and providing improved land efficiencies within Saugeen Shores .

Institutional (I) Zone – Section 20

Section 20 of the Zoning By-law describes the scope, permitted uses, regulations, and special uses and provisions pertaining to the Institutional (I) Zone. Elementary and secondary public schools are permitted uses within the I Zone.

BWDSB planning staff note that Section 20.3 g) of the Zoning By-law restricts the maximum height within the I Zone to 10 metres. Current best practices for school design include two and three storey school heights in order to minimize building footprints and maximize the use of land. As such, planning staff respectfully request that the maximum building height in the I Zone be increased to 15 metres to better align with current best practices.

The above policies have been highlighted as being of particular interest to Bluewater District School Board in order to support the provision of Public Service Facilities when and where they are needed.

Please provide BWDSB with a copy of the Notice of Decision.

Please do not hesitate to contact us by telephone at 519-363-2014 or by email at shelley_crummer@bwdsb.on.ca if you have any questions, concerns or for more information.

Sincerely,

Shelley Crummer
Business Analyst

c.c.: Andrew Low, Superintendent of Business Services
Dennis Dick, Manager of Plant Services