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January 28, 2022

Mayor Bailey and Members of Council
County of Brant
26 Park Avenue
P.O. Box 160
Burlford, Ontario N0E 1A0

Dear Mayor and Council:

**COUNTRY OF BRANT PROPOSED HOUSEKEEPING ZONING BY-LAW AMENDMENT
ADDITIONAL RESIDENTIAL UNIT
PLANNING ADVISORY COMMITTEE/PUBLIC MEETING - FEBRUARY 1, 2022**

On behalf of our client, who is pursuing the permissions for an Additional Residential Unit for their property located at 409 German School Road, County of Brant please accept this letter as part of their comments related to the proposed Zoning By-law amendment. An application to the County for an Additional Residential Unit is being prepared and should be submitted shortly.

Our client has had several meetings and discussions with County Planning staff over the last few months related to their intent to develop an Additional Residential Unit. County Planning staff have been clear in their objection to the proposed Additional Residential Unit and advised that additional changes to the Zoning By-law regulations would be considered early in the new year. However, given the County process, at the time of preparing this letter we do not have the benefit to review the report that should outline the rationale for the proposed changes although we understand the limitations that they would provide. We question whether the proposed regulations are not policies and not appropriate to include as a Zoning By-law Regulation. However, this does not change our concerns for the proposed changes as we understand them today.

The Province of Ontario has been clear in their requirements as it relates to Additional Residential Units (Planning Act - Section 16(3)) and Ontario Regulation 299/19. There is agreement that the County through the approved Official Plan and the proposed draft Official Plan provides policies to provide guidance to the implementation of the Additional Residential Unit and the Zoning By-law provides the regulations to be addressed.

However, our concern is where the Province provides the permission as of right, the County policies and regulations could lead to a prohibition which is of concern. The County can create guidance which is helpful. However, the process for evaluation should be focused on the merits of the request in its site-specific context, and not the imposition of barriers which preclude the opportunity which is to be as of right.

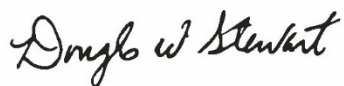
In addition, recent announcements from the Provincial Government have been focused on the improvement and timing of the delivery of housing, ensuring affordability and addressing the housing crisis. The Additional Residential Unit is an opportunity to support many of these initiatives.

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Should you have any questions, do not hesitate to contact our office.

Yours truly,

IBI GROUP

A handwritten signature in black ink that reads "Douglas W. Stewart". The signature is written in a cursive, flowing style.

Douglas W. Stewart, MCIP, RPP
Associate, Manager - Urban and Regional Planning

DWS/ms

cc: Mat Vaughan, County of Brant