

# STAFF REPORT

THE CORPORATION OF THE TOWN OF COBOURG



<b>Report to:</b>	Planning & Development Advisory Committee (PDAC)	<b>Priority:</b>	<input checked="" type="checkbox"/> High <input type="checkbox"/> Low
<b>Submitted by:</b>	Rob Franklin, MCIP, RPP Manager of Planning, <a href="mailto:rfranklin@cobourg.ca">rfranklin@cobourg.ca</a>	<b>Meeting Type:</b>	Open Session <input checked="" type="checkbox"/> Closed Session <input type="checkbox"/>
<b>Meeting Date:</b>	July 6, 2021		
<b>Report No.:</b>	Z-04-21		
<a href="#">Submit comments to Council</a>			

**Subject/Title:**      **Application for Approval of a Draft Plan of Subdivision –  
Kwendill Holdings Ltd. (Lands on south side of Kerr Street)**

## RECOMMENDATION:

THAT the Planning and Development Advisory Committee (PDAC) receive this report for information purposes; and,

FURTHER THAT Council be advised that the PDAC endorses the conclusions of the Planning Report; and,

FURTHER THAT the PDAC recommends the By-law attached to the Planning Report as **Appendix I** be endorsed by Council which grants Draft Plan of Subdivision approval to Kwendill Holdings Limited for the subdivision of 6.21 hectares of industrial lands into six (6) individual parcels for future development, subject to the fulfillment of Draft Plan conditions, the execution of a Subdivision Agreement, and Site Plan Approval (SPA) for each parcel.

## 1. STRATEGIC PLAN

N/A

## 2. PUBLIC ENGAGEMENT

The application for Draft Plan of Subdivision was submitted by RFA Planning Consultants on behalf of Kwendill Holdings Limited in April 2021 for the subject property. Council formally received the application for approval of Draft Plan of Subdivision at its meeting on April 26, 2021. The application was referred to the

Planning Department for a report, and Council directed staff to schedule a Public Meeting in accordance with the *Planning Act*.

Section 51 (20) of the *Planning Act* prescribes statutory requirement of a complete Draft Plan of Subdivision application, and the scheduling of a public meeting. Notice of a Complete plan of subdivision and notice of a public meeting can be provided together. The Municipality is required to give notice by either:

- a) publication in a newspaper that is of sufficient circulation in the area which the application applies; *or*
- b) personal or ordinary service mail to every land owner within 120 metres of the subject land, and by posting a notice, clearly visible from a public highway or other place the public has access on the subject land, or a location chosen by the municipality.

The Municipality's notification procedures for complete applications and public meetings included both a) and b) above, including the posting of signs on the frontage of the property, which met and exceeded the notice requirements prescribed by the *Planning Act*. In addition, the Town provided an information and application receipt memo to Council for information purposes in open session and posted relevant information regarding the development on its Planning Applications page of the municipal website (Planning & Development).

On May 26, 2021, the applicant convened a public Open House where two (2) members of the public attended and were generally supportive of the proposed employment development. A Planning Public Meeting of Council was held on June 14, 2021 in accordance with the provisions of the *Planning Act*. There were no public submissions received regarding this application.

Any members of the public on record as making submissions to the Town prior to a decision being rendered will be notified when the application and Planning Report are being considered by Council for consideration.

### **3. PURPOSE**

The purpose of this report is to provide a planning analysis and justification regarding the subdivision of vacant industrial lands (Kwendill Holdings Ltd.) located on the south side of Kerr Street for future employment development.

### **4. ORIGIN AND LEGISLATION**

An application for approval of Plan of Subdivision was submitted by RFA Planning Consultants on behalf of Kwendill Holdings Limited in April 2021. Council moved that the application be received and referred to the Planning Department for a report at their meeting on April 26, 2021 and further directed that a Public Meeting be held. The Public Meeting was convened on June 14, 2021 and no public

submissions were received for this application. An applicant-led public Open House was also held on May 26, 2021 with no objections being raised.

In accordance with the provisions of the Planning Act, if the Municipality fails to approve the complete application within 120 days of its receipt, the applicant may appeal the application to Ontario Land Tribunal (OLT).

## 5. BACKGROUND

### 5.1 Owner

Kwendill Holdings Limited

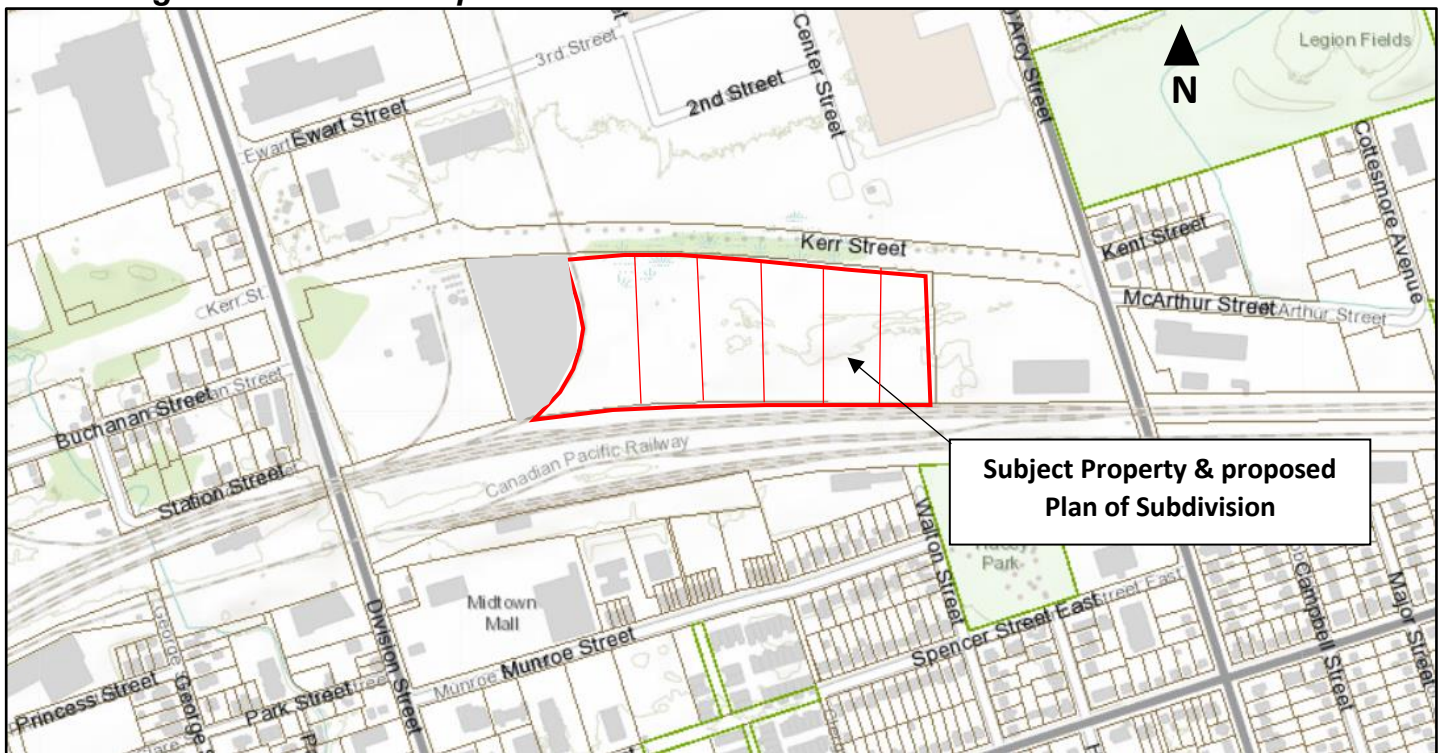
### 5.2 Applicant/Agent

RFA Planning Consultants Inc. – Mr. Shawn Legere, MCIP, RPP

### 5.3 Property Address

The subject lands located on the south side of Kerr Street, running east of the Home Hardware property and rail spur to Limpack on D'Arcy Street, as illustrated in the attached **Figure 1 – Context Map** below.

**Figure 1 – Context Map**



### 5.4 Existing Land Uses

The subject land is currently vacant.

### 5.5 Surrounding Land Uses

The subject property is surrounded by a mix of Industrial and Transportation land uses:

**North:** Northam Industrial Park

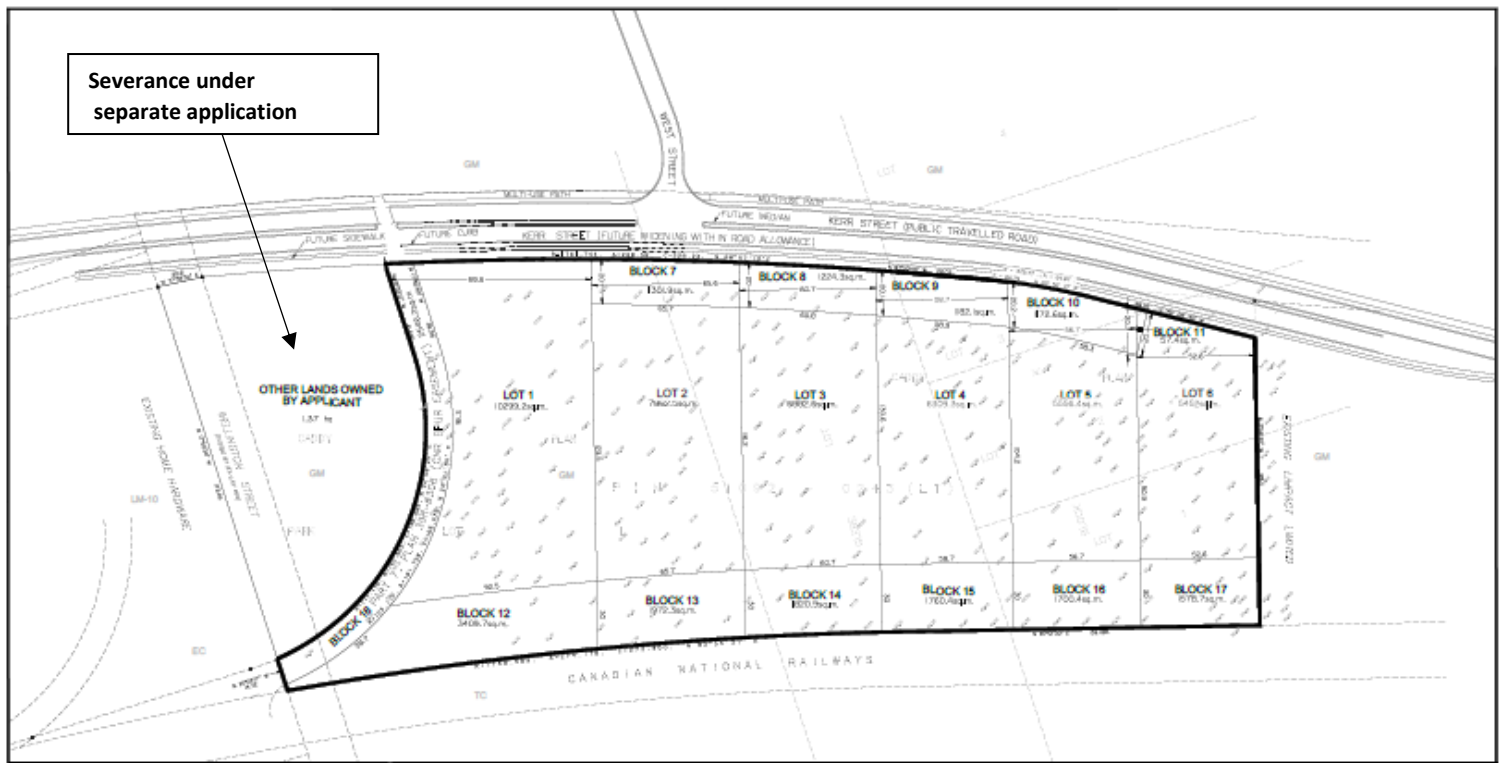
**East:** Industrial Lands

**South:** CN/CP Railway Tracks and residential south of railway

**West:** Vacant industrial parcel, Home Hardware

## 5.6 Proposal

The application proposes to subdivide an existing vacant industrial parcel into six (6) separate parcels for the purpose of future development. The subject parcel is a 6.2 hectares (15.35 Acres) and is situated adjacent to the existing Northam Industrial Park. A separate application was heard by the Committee of Adjustment for the lands west of the railway spur (File B-04-2021) to create it as a lot outside of this Plan. Please refer to **Figure 2 Proposed Draft Plan of Subdivision** below.



**Figure 2: Proposed Draft Plan of Subdivision**

The following reports and plans were submitted in support of the subdivision of land:

- **Planning Justification Report** – Prepared by RFA Planning Consultant Inc. dated March 2021;
- **Stormwater Management Report** – Prepared by Dobri Engineering Ltd., dated February 2021;
- **Geotechnical Report** – Prepared GHD, January, 2021;

- **Erosion and Sediment Control Plans** – Prepared by Dobri Engineering Ltd., February, 2021;
- **Functional Servicing Report** - Prepared by Dobri Engineering Ltd., February, 2021;
- **Reference Plans (39R-13906 & 39R-8306)** – Prepared by IBW Surveyors, February 2019;
- **Tree Inventory and Assessment** – Prepared by Cressman Tree Maintenance and Landscaping, January 2021.

The above reports were circulated to and reviewed by municipal departmental staff and partner review agencies, including the Ganaraska Region Conservation Authority (the “GRCA”) and County of Northumberland (the “County”), as part of the development proposal review process.

A copy of the Planning Justification Report prepared by RFA Planning Consultants Inc. is attached as **Appendix II**.

## 6. ANALYSIS

In considering the subject application, an understanding of the applicable provincial legislation and local policies is beneficial when reviewing applications for approval of a draft plan of subdivision. The background reports submitted with the subject application, particularly the Planning Justification Report, provide an overview of the subject application relative to provincial and local policies and provide conclusions relating to the conformity therewith. It is not the intent of this Planning Report to duplicate the review and analysis provided in these reports, however the following sections provide a general “high level” summary of the relevant background and commentary submitted by the applicant from a municipal planning staff perspective and are intended to complement and be read in conjunction with the submitted reports.

### 6.1 Planning Act, RSO 1990, c.P. 13, as amended

In accordance with the approval process of the *Planning Act*, the requirements for considering an application for approval of a draft plan of subdivision include public notification, convening a Public Meeting, imposing draft conditions, and awaiting an appeal period. The Municipality is required to have regard to various criteria during the evaluation of a draft plan of subdivision as contained in Section 51(24) of the Planning Act.

- a) the effect of the proposed subdivision on matters of provincial interest, as reflected in Section 2 of the Act, the Provincial Policy Statement (PPS) and the Place To Grow Growth Plan for the Greater Golden Horseshoe;

*Further reference to and discussion on these matters is found below and in Section 6.2.*

- b) whether the proposed subdivision is premature or in the public interest;



*The Draft Plan of Subdivision is located within an urban, serviced area of the municipality and is located within the “built boundary” as established by the Place to Grow Growth Plan for the Greater Golden Horseshoe, 2019 (the “Growth Plan”). The development of the subject lands represents a logical and compatible development within the greater Northam Industrial Park industrial precinct. Conditions of draft plan approval will include provisions relating to servicing, stormwater management, urban design/streetscapes, landscaping, performance security and other technical matters to ensure the development meets all relevant municipal and agency policies, guidelines, and standards prior to final approval of the Plan of Subdivision and a Subdivision Agreement by Council (refer to **Appendix I**).*

- c) whether the plan conforms to the Official Plan (OP) and adjacent plan of subdivision;

*Discussion on Official Plan conformity is found in Sections 6.3 and 6.4. The proposed draft plan of subdivision is comprised of a development form that is compatible with the existing employment area. The proposed employment complex appropriately reflects its context on a planned major arterial road and is designed to be compatible with adjacent land uses.*

- d) the suitability of the land for the subdivision;

*The subject land is relatively flat and is comprised of silty sand soils and till. Generally, the site is well-suited for the development proposed.*

- e) the adequacy of highways in the vicinity of the subdivision;

*The existing municipal street pattern and transportation system in the vicinity of the subdivision lands are satisfactory to accommodate the proposed employment enclave. The proposed industrial lots are expected to have minimal traffic impacts on the surrounding intersections and road network.*

- f) the dimensions and shapes of the proposed lots;

*The dimensions and shapes of the proposed lots in the draft plan of subdivision are regular and appropriate for the area.*

- g) the restrictions on the lands to be subdivided or adjoining lands;

*The lands are subject to the policies and regulations of the Official Plan and implementing Zoning By-law, both of which are in force and effect and permit the proposed development. The development form is consistent with the surrounding industrial development. A comprehensive set of draft plan conditions will be imposed to ensure that the development complies with all applicable municipal and agency standards, and shall include the execution and the registration of a Subdivision Agreement with the Town of Cobourg. The development of individual lots will each be subject to Site Plan Approval.*

- h) conservation of natural resources and flood control;

*The subject lands have been evaluated for significant natural heritage resources and the submitted Tree Inventory and Assessment identified that the existing vegetation is of poor quality and/or species variety and will be cleared as part of the servicing and grading process for the subdivision. A landscape planting plan will be required as a condition of draft plan of subdivision approval for each of the individual lots upon development.*

*With respect to flood control, the applicant has submitted a Stormwater Management Report, prepared by Dobri Engineering, to demonstrate that stormwater run-off and management systems are feasible to service the subject lands. The Dobri Report considered drainage flows from the subject lands both pre- and post-development, and proposes a common stormwater management facility to be located along the southern boundary to capture and treat runoff from the subdivision lands before exiting beneath the railway tracks (as it presently does). All infrastructure costs associated with servicing the site will be borne by the proponent(s). The technical stormwater management design details will be finalized as part of the conditions of draft plan approval to the satisfaction of applicable authorities and prior to final approval by Council.*

- i) the adequacy of utilities and municipal services;

*Utilities and municipal services to the site are adequate, and any infrastructure improvements required to service the Subject Lands will be further assessed prior to final approval of the draft plan of subdivision as a condition of development.*

- j) the adequacy of school sites;

*Given this is an employment property, this provision is not applicable.*

- k) the area of land to be dedicated for public purposes;

*The existing employment district is situated in close proximity to existing parkland and community facilities. There is no parkland proposed as part of the subdivision, however the Town will receive cash-in-lieu of parkland as a condition of draft plan approval.*

- l) the efficient use and conservation of energy;

*The proposed subdivision represents a desirable compact built form for employment purposes and is an efficient use of existing infrastructure. The proposed development supports the Town of Cobourg's sustainability strategy by promoting intensification, reducing the consumption of land, creating productive environments, and promoting the reduction of GHG's with a design that is supportive of transit use and active transportation modes of travel. Further sustainable design features for the proposed buildings will be captured as a condition of draft approval and evaluated prior to final approval by Council.*

- m) the interrelationship between the design of the plan of subdivision and site plan control matters relating to development on the lands.

*The plan of subdivision will be subject to detailed conditions of approval which must be satisfied prior to final approval by the Municipality, and each individual lot will be subject to the Municipality's Site Plan Approval (SPA) requirements. Both tools are effective and work well together in ensuring the appropriate development of the subject lands.*

As referenced above, the Municipality shall have regard to matters of Provincial interest under Section 2 of the Act, including such applicable matters as: the adequate provision and efficient use of infrastructure; orderly development of safe and healthy communities; accessibility for persons with disabilities; adequate provision of a range of employment facilities; protection of public health and safety; appropriate location for growth and development; and, promotion of sustainable and pedestrian-friendly design, and be transit supportive.

#### *Comment/Opinion*

Municipal planning staff has reviewed the applications in light of the aforementioned items of Provincial interest. The proposed draft plan of subdivision represents an orderly, staged development pattern on full municipal services and is comprised of an appropriate form and mix of employment uses which is consistent with Provincial Policy and in compliance with the existing, approved Official Plan and Zoning By-law. The arrangement of parcels on the site is compatible with adjacent land uses with appropriate buffering (ie. berm, fencing) to be implemented as part of conditions of draft approval (**Appendix I**). In my planning opinion, the proposed draft plan of subdivision has appropriate regard to matters of Provincial interest under Sections 2 and 51 of the *Planning Act*. Section 6.2 below provides further commentary of the proposal relative to matters of Provincial interest.

### **6.2 Provincial Policy Statement (PPS) & A Place Growth Plan (2019)**

The *Planning Act* requires that the Council of a local Municipality shall make decisions on development applications which are consistent with the Provincial Policy Statement (PPS) and conform to the Growth Plan. The PPS promotes appropriate development based on the efficient land use patterns that optimize the use of the land, resources, infrastructure and public service facilities, provided the ability to meet the long-term needs. The PPS was issued by the Ministry of Municipal Affairs and Housing under the *Planning Act* and the Growth Plan was issued under the *Places To Grow Act*.

Section 4 of the Planning Justification Report provides and in depth analysis of the key Provincial Policies and Principals, while the Section 5 provides an in-depth analysis of the conformity with Place to Grow Act (2019) (pages 15-20).

In general, the primary directives of the documents encourage a development consistent with the followings policies:

- i. Efficient use land and resources;



- ii. Are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned and available, and avoid the need for their unjustified and/or uneconomical expansion;
- iii. Minimize negative impacts to air quality and climate change, and promote energy efficiency;
- iv. Support active transportation;
- v. Are transit-supportive, where transit is planned, exists or may be developed;
- vi. Providing for an appropriate mix and range of employment, institutional and broader mixed uses to meet the long-term needs; and,
- vii. Ensuring the necessary infrastructure is provided to support current and projected needs.

The Growth Plan builds on the policy foundation set out in the PPS and provides a framework for managing growth and achieving compact and complete communities within applicable jurisdictions. The Growth Plan contains population and employment forecasts, and policies which direct growth to established settlement areas and, more specifically, delineated built-up areas with existing or planned transit, and areas and existing or planned public service facilities. (Growth Plan 2.2.1.2a; 2.2.1.2c). The urban built form should be consistent with the built area and supportive of transit and infrastructure needs of the employment land uses.

### **Comment/opinion**

The subject property is located within an urban, serviced settlement area, forms part of the employment district of Northam Industrial Park, and is considered part of the “built boundary” of Town of Cobourg as established by the Growth Plan and Cobourg Official Plan. Accordingly, the proposal is considered intensification within the existing built-up area of the municipality and is an infill development.

In accordance with applicable Provincial and County policies, the Town of Cobourg is expected to grow approximately 1,772 employment jobs by 2034 in support of the projected increase in population. The subdivision of the larger landholding into smaller lots would help satisfy growing demand for small to medium-sized employers and contribute towards the achievement of expected employment growth projections as spelled out in the Growth Plan and County & Town Official Plans.

Based on my review of the application for approval of a Draft Plan of Subdivision, including the supporting background information, it is my opinion that the application is consistent with the PPS and conforms to the Growth

Plan. Specifically, the proposal provides for orderly intensification of employment uses within the urban, serviced area of the municipality and makes effective use of existing infrastructure which will serve to reduce costs and the consumption of land. The plan will provide for an appropriate mix and range of employment uses to meet the long-term needs of the community and region. The subject property is accessible by the newly constructed Kerr Street with special requirements for freight-supportive transportation routes.

Therefore, I concur with the conclusions and opinions contained in the Planning Justification Report submitted by the RFA Planning Consultants Inc. regarding the conformity to matter of Provincial Interest as reflected in the PPS and Growth Plan.

### **6.3 County of Northumberland Official Plan, 2016**

The County of Northumberland Official Plan (the “County OP”) was approved by the Ministry of Municipal Affairs and Housing on July 29, 2015 and finally approved by the Ontario Municipal Board on November 23, 2016. In general, the purpose of the County OP is to:

- Establish a broad, upper tier policy framework intended to guide local municipalities in the preparation of their Official Plans, Official Plan Amendments and zoning by-laws;
- Implement the PPS and Growth Plan at the County level; and,
- Establish a framework for coordination and cooperation amongst local municipalities and the County on planning and development issues that cross municipal boundaries.

The County OP is not intended to duplicate the policies of local Official Plans and recognizes that certain land use planning responsibilities are vested with local municipalities. Accordingly, the County OP provides over-arching guidance necessary to formulate detailed strategies, policies and land use designations at the local level. Thus, the land use designations and policies in the Cobourg OP essentially remain intact, but would need to be monitored and regularly updated to ensure conformity with the County OP.

The County OP encourages each of the six (6) urban areas in the County to become complete communities, including provision of convenient access to an appropriate mix of jobs, local services, and community that supports majority of the residents with a strong live/work ratio. Accordingly, it is the objective of the County OP to:

- Protect, enhance and maintain existing urban areas as diverse, livable, safe, thriving and attractive communities;
- Promote the efficient use of land and infrastructure by directing most development to urban areas where full services are available;

- Provide opportunities for a diversified economic base, including an appropriate mix of employment and institutional uses to meet long term needs;
- Establish an integrated transportation system that safely and efficiently accommodates various modes of transportation including public transit, cycling and walking;
- Provide for an interconnected system of public spaces that offer convenient and comfortable access and promote safe and healthy environments;
- Plan for, protect and preserve employment areas for current and future uses and ensure that the necessary infrastructure is provided to support current and projected needs;
- Protect employment areas in proximity to major goods movement facilities and corridors for employment uses that require those locations and which can be serviced by full municipal sewer and water services within the planning period; and,
- Encourage a high standard of urban design;

### **Comment/opinion**

It is my opinion that the proposed Draft Plan of Subdivision provides a desirable employment enclave to meet the County's policies of intensifying growth within urban serviced settlement areas. The Draft Plan will contribute towards the County's employment projections in a manner consistent with the Provincial Growth Plan. In addition, the proposed industrial subdivision integrates well with the existing built environment and land uses of the Northam Industrial Park and the Town's projected vision for this employment precinct. The Draft Plan promotes the efficient use of existing infrastructure and proposes innovative "green techniques" to accommodate stormwater runoff.

Section 5 of the Planning Justification Report provides an in-depth analysis of the applicable policies of the County Official Plan (Pages 21-25).

Based on my review of the application and supporting documentation, I concur with the conclusions of the RFA Planning Consultants Inc. Planning Justification Report, and it is my planning opinion that the Draft Plan of Subdivision application conforms to the County Official Plan.

### **6.4 Town of Cobourg Official Plan, 2017**

The Official Plan is a broad policy document that establishes an overall planning framework or vision for the community, including policies for maintaining and enhancing the existing community structure and for managing change, and for guiding the municipality in implementing the planning process through a variety of mechanisms and approaches.

The Subject Land is designated “Employment Area” and located within the “Built Boundary” on Schedule “A” Land Use Plan of Town of Cobourg’s Official Plan. Section 6 of RFA Planning Consultants Inc. Planning Justification Report provides an in-depth analysis of the applicable Official Plan policies (pages 26-29).

#### **i. General**

Consistent with Provincial and County Policies noted above, some of the key objectives of Cobourg’s Official Plan include ensuring consistency and compatibility with the existing built form, providing adequate buffers between non-employment land uses as well as other employment areas, ensuring the land area is of a sufficient size to provide for a range of employment uses, adequate and appropriate infrastructure is in place, employment area traffic does not access residential areas; and, orderly development of lands to accommodate future employment targets.

#### **Comment/opinion**

The proposed subdivision of land into six (6) separate parcels would provide options for a variety of employment opportunities to be established in the near future. The subdivider will be required to satisfy a comprehensive set of draft plan conditions, submit detailed engineering and grading plans and execute a Subdivision Agreement before the plan could be registered, and development of each lot would be subject to Site Plan Approval (SPA) process to ensure compliance with the regulations and standards of the Municipality, partner review agencies (ie. County, GRCA) and external agencies (ie. railways).

The newly constructed Kerr Street extension along the north side of the property is planned to function as a major cross-town arterial road according to Schedule E – Road Network Plan and will provide the main ingress/egress for the proposed lots. Figure 3 (below) illustrates the proposed subdivision of land and stormwater management located within the subject property. Given the location of the site relative to the railways to the south, a 2.5 metre high safety earth berm and a 1.83 metre chain link fence is proposed along the south limit of the site abutting the CNR/CPR Railway in conformity with the applicable Official Plan policies and railway requirements.

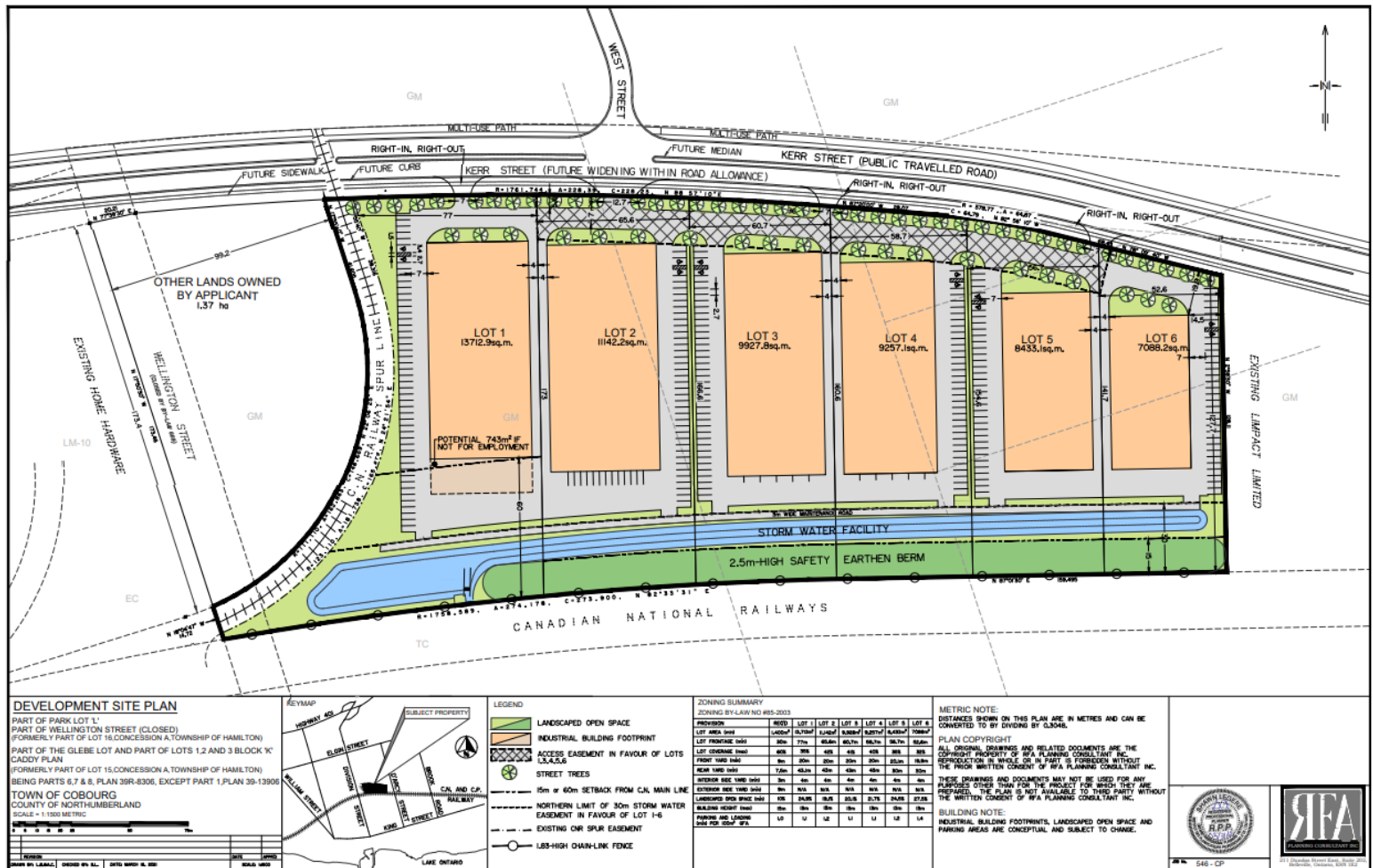


Figure 3: Proposed Subdivision of Subject Land

## ii. Municipal Servicing and Infrastructure

The newly built Kerr Street is a serviced arterial road, however, the development of each lot will require Site Plan Approval to address site specific requirements for servicing, grading and any additional infrastructure requirements that may apply to the development proposed. The additional infrastructure needs for the subdivision lands are anticipated to be minimal and generally relate to site grade issues, on-site stormwater management, service connections, etc..

## iii. Tree Inventory and Assessment

A Tree Inventory and Assessment conducted by Cressman Tree Maintenance and Landscape Ltd. was submitted with the application and it was their opinion that the majority of the trees within the site are in fair to poor condition and not quality or protected species. The subdivision lands will also need to be extensively graded to ensure proper drainage. Each lot will be subject to Site Plan Approval and landscape design will form part of the application submission requirements to ensure a sustainable and environmentally friendly design is introduced, and that sufficient tree compensation is provided to replace removed tree canopy.

#### **iv. Urban Design**

In order to achieve high quality design standards along arterial roads, the Town of Cobourg highly encourages proponents to consider and integrate the Town's Urban and Landscape Design Guidelines into any proposed design. The submitted Plan of Subdivision is predominantly addressing the subdivision of the land and no design concepts were submitted with the application. Development of each lot is subject to Site Plan Approval, where design and technical requirements will be evaluated according to the Urban and Landscape Design Guideline to ensure compliance.

It is my planning opinion that the proposed development is consistent with the policies of the Official Plan, and the landscape and urban design requirements for the development will be evaluated during each stage of development to ensure compliance.

#### **6.5 Zoning By-law**

The subject property is currently zoned "General Industrial (GM)" in the Town of Cobourg's Comprehensive Zoning By-law. Section 8 of the Planning Justification Report provides an in-depth analysis of applicable zoning standards for the subject property. Accordingly, the proposed lots are in compliance with the Zoning By-law standards and Planning staff is supportive of the conclusions of RFA Planning Consultants. The proposed lot areas and frontages meet the Zoning By-law regulations.

As there are no specific development proposals for the individual lots at this time, an in-depth technical analysis will occur during the Site Plan Approval stage once development proposals come forward.

It is my opinion that the proposed development is consistent with the Zoning By-law provisions.

#### **6.6 Department & Agency Comments**

The application was reviewed by the Development Review Team (DRT) and a report containing comments from the Team was returned to the consultant for review. There were no major concerns were raised during the 1<sup>st</sup> submission of the Draft Plan of Subdivision. Specific requirements for grading, drainage, stormwater management, access/entrances and infrastructure will be included as conditions of Draft Plan approval and Site Plan Approval.

#### **6.7 Public Submissions**

No submissions were received regarding the application for Draft Plan of Subdivision in writing, email or at the Public Meeting.



## 6.8 Draft Plan Conditions

Based on comments received by the Development Review Team (DRT), agencies and other authorities having jurisdiction, a comprehensive set of draft plan conditions of approval have been prepared which will need to be satisfied and cleared prior to final approval of the draft plan by Council. The draft plan conditions are outlined in Schedule A of **Appendix I**. Subsequent to final subdivision plan approval, each individual lot will be subject to Site Plan Approval.

## 7. FINANCIAL IMPLICATIONS/BUDGET IMPACTS

There are no anticipated negative financial implications imposed on the Municipality as a result of the approval of the application. The Developer will be responsible for all infrastructure costs associated with servicing and developing the site. The applicant submitted the requisite \$10,060.00 in application fees and deposit. Development of the lots is contingent upon the subdivider clearing conditions of Draft Plan of Subdivision Approval and executing a Subdivision Agreement, followed by Site Plan Approval for each individual lot.

## 8. CONCLUSIONS

Based on the evaluation of the application relative to the applicable Provincial and Municipal policy and framework, it is my planning opinion that the proposed Draft Plan of Subdivision is appropriate, desirable and represents good planning for the following reasons:

- The proposal will satisfy the key policy and regulatory directives of the Planning Act, Provincial Policy Statement, A Place To Grow Growth Plan, County of Northumberland Official Plan and the Cobourg Official Plan, most notably:
  - i. providing for an appropriate mix and range of employment uses to meet the long-term needs;
  - ii. ensuring the necessary infrastructure is provided to support current and projected needs; and,
  - iii. contributing to the projected intensification and employment targets for the municipality in accordance with the policy direction of the County Official Plan and Growth Plan.
- The Draft Plan of Subdivision complies with the General Industrial (GM) Zone and would create lots of a sufficient size and configuration to meet the provisions of the Zoning By-law;
- The proposed industrial development is of the size and scale which is compatible with adjacent land uses and is appropriate for this infill site; and,

- The inclusion of appropriate conditions to draft plan of subdivision approval as outlined in **Appendix I** will ensure that the development meets all of the applicable standards and requirements of the Municipality and external authorities having jurisdiction, including the registration of a Subdivision Agreement, prior to final approval of the Plan by Council. Site Plan Approval will apply to the individual lots.