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# P L A N N I N G JUSTIFICATION REPORT

399410 ONTARIO LIMITED/  
CANADIAN CENTRE FOR ADDICTIONS  
420 DIVISION STREET  
TOWN OF COBOURG

SEPTEMBER 2020 (REVISED NOVEMBER 2020)  
FILE #8766-1



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# 1. INTRODUCTION



## 1.1 PURPOSE OF THE REPORT

Weston Consulting is the planning consultant for the applicant and the planning agent for the owner of the property municipally known as 420 Division Street, in the Town of Cobourg (herein referred to as the “subject property”). The prospective owner, Canadian Centre for Addictions, intends to repurpose the subject property to provide a “Residential Treatment Facility” for persons recovering from addictions.

Applications have been submitted to the Town of Cobourg for a Zoning By-law Amendment, to permit the proposed use of a Residential Treatment Facility on the subject property. The application and supporting materials are submitted in accordance with communications received from Planning and Regulatory Staff at the Town of Cobourg, and constitute a complete application as described in Section 34 (10) and Section 51 (17) of the Planning Act.

This Report provides the planning rationale in support of the Zoning By-law Amendment application for the proposed use of a Residential Treatment Facility and provides planning analysis and justification for the proposal, in accordance with good planning principles.

A Pre-Application Consultation Meeting was held on February 11, 2020 to evaluate the proposal in the context of the policies of the Provincial Policy Statement (2020), A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019), County of Northumberland Official Plan (2016), Town of Cobourg Official Plan (2010), and the Town of Cobourg Zoning By-law 85-2003.

The purpose of this report is to outline the nature of the proposed use of a Residential Treatment Facility and to evaluate the proposal in the context of the policies and regulations of the Planning Act, Provincial Policy Statement (2020), A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019), County of Northumberland Official Plan (2016), Town of Cobourg Official Plan (2010), Town of Cobourg Zoning By-law 85-2003, and other applicable policies, studies and regulations that apply to the subject property.

This Report provides planning analysis and justification in accordance with good planning and urban design principles, and provides a basis for the advancement of the planning application through the planning process.





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## 2. SITE DESCRIPTION AND CONTEXT



## 2.1 LEGAL DESCRIPTION

The subject property is legally described as follows:

PT LT 2 BLK H PL CADDY, PART 2, 39R13691 TOWN OF COBOURG

## 2.2 DESCRIPTION OF SUBJECT PROPERTY

The subject property is bounded by Division Street to the west and John Street to the east, north of University Avenue East. The property is comprised of one parcel, municipally known as 420 Division Street, in the Town of Cobourg. The property has approximately 38.12 metres of frontage along Division Street and 40.29 metres of frontage along John Street, with a site area of approximately 0.94 acres (0.28 hectares). There are two access points to the site, one located along Division Street and the other located on John Street.

The subject property is currently occupied by a two storey hotel, known as The Woodlawn Country Inn and Restaurant, and an associated surface parking lot. The existing building is located towards the centre of the lot and parking is provided on both the east and west sides of the building. It is important to note that the existing building will be maintained for the proposed use. No alterations have been proposed for the interior or exterior of the building.



Figure 1: Aerial Photograph of the Subject Property



## 2.3 Regional and Neighbourhood Context

The subject property is located in County of Northumberland, more specifically in the Town of Cobourg. Located in central Cobourg, the subject property is located approximately 600 metres from Cobourg's downtown area. The immediate surrounding area is characterized by a variety of uses, ranging from residential to commercial and institutional.



## 2.4 Surrounding Land Uses

Land uses in the near vicinity are as follows:

North: Directly to the north of the subject property are the Royal Apartments building – a five storey apartment building, as well as a two storey commercial building. Further to the north there are various commercial buildings and plazas.

East: Directly to the east of the subject property, across John Street, is a two and a half storey walk-up apartment building and the Cobourg Clinic. Further to the east is Victoria Retirement Living as well as Ryerson Commons, Cobourg's adult lifestyle condominium community, located to the east of the subject property, along Spencer Street East.

South: Directly adjacent to the site are three buildings, two single detached homes and a commercial business, located at the corner of University Avenue East and Division Street. Further to the south, across University Avenue East, is a neighbourhood consisting primarily of single detached residential dwellings;

West: To the west, across Division Street, is a neighbourhood consisting primarily of single detached homes. Further southwest, along University Avenue West is Saint Michael the Archangel Church and Saint Michael Catholic Elementary School.



Figure 2: Site Context Aerial Photograph





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## 3. PROPOSED DEVELOPMENT



The following description for the proposal should be viewed in conjunction with the conceptual Site Plan and Floor Plans prepared by Bruce MacNeill Architects.

The subject property is currently occupied by a two storey hotel, known as The Woodlawn Country Inn and Restaurant. The proposal considers maintaining the existing building on site, to facilitate a privately owned, Residential Treatment Facility, as the current building is of sufficient size to accommodate the proposed use. The facility would provide lodging, meals and therapy for those recovering from addictions. The existing 18 rooms will house 40 patients (two to three per room) and administrative offices.

The facility anticipates a total of 12 staff members during daytime hours and six during overnight hours, as the centre provides care for 24 hours a day, seven days a week. It is anticipated that one maintenance person is to be hired to ensure proper upkeep of the house and the grounds. Minimal traffic is anticipated, as parking is only required for staff and visitors. As per the Traffic and Parking Brief prepared by Trans-Plan Transportation Engineering, it is anticipated that 20 spaces are required and can be accommodated within the existing 40 parking spaces currently located on the site. No additional modifications to the existing parking lot are required, as patients must be driven to the facility to be admitted.





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## 4. PUBLIC CONSULTATION



A public consultation strategy, consistent with the Planning Act requirements under Bill 73 is proposed to include the following:

- A Notice of Complete Application will be circulated to all property owners within 120 metres of the subject property by the municipality detailing the nature of the applications and the requested amendments to the Official Plan and Zoning By-law.
- An Application Notice Sign will be posted on the subject property by the proponent identifying the request for amendments to the Official Plan and Zoning By-law and the intent of the proposed redevelopment.
- A Statutory Public Meeting will be scheduled by the municipality with notice circulated a minimum of 14 days prior to the meeting date to all property owners within 120 metres of the subject property.
- Comments from the public and Council will be documented and responded to, where possible, through a formal resubmission to the City.
- Based on the comments received, an informal public meeting may be held, as required with various stakeholders in the community.

It is our understanding that the above public consultation strategy is consistent with the requirements under the Planning Act.





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## 5. DESCRIPTION OF THE PLANNING APPLICATION



A Zoning By-law Amendment application has been submitted to the Town of Cobourg to facilitate the proposed use of a Residential Treatment Facility. The proposed Zoning By-law Amendment is to rezone the subject property from *District Commercial (DC-2)* zone to *District Commercial (DC-X)* with site specific exception. The proposed site specific exception seeks to allow for a Residential Treatment Facility as a permitted use. The Draft Zoning By-law Amendment has been submitted under a separate cover.





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## 6. SUPPORTING MATERIALS



A Pre-Application Consultation Meeting was held on February 11, 2020 with Town of Cobourg Staff to discuss the proposal and determine the required studies, plans and other supporting materials required in support of the proposed Residential Treatment Facility. In accordance with the letter provided by Rob Franklin, dated March 4, 2020, the following provides a brief summary of the submitted supporting studies and reports.



## 6.1 FUNCTIONAL SERVICING BRIEF

A Functional Servicing Brief was prepared by Crozier Engineering, in support of the proposed use of a Residential Treatment Facility on the subject property. The grading and stormwater management perspective, the site will remain as existing conditions, as no changes are proposed for the existing site. With regards to water servicing, the proposed usage of the site will result in an increase of the maximum daily and peak hourly water demand by 0.18 L/s and 0.27 L/s, respectively. The existing 50 mm diameter water service is connected to the 300 mm diameter watermain on John Street and has sufficient capacity to service the proposed Residential Treatment Facility. In terms of sanitary servicing, the proposed usage of the site will result in an increase of the sanitary design flow by 0.11 L/s. The existing 150 diameter sanitary sewer is connected to the existing 200 mm diameter sanitary sewer on John Street and has sufficient capacity to service the proposed development.

Based on the findings of the Functional Servicing Brief, Crozier Engineering recommends the approval of the Zoning By-law Amendment for the proposed Residential Treatment Facility, from a functional servicing perspective.



## 6.2 TRAFFIC AND PARKING BRIEF

A Traffic and Parking Brief was prepared by Trans-Plan Transportation Engineering, in support of the proposed use of Residential Treatment Facility on the subject property. The traffic review findings determined that the future site traffic volumes, through the implementation of a Residential Treatment Facility, would be relatively similar to the existing site traffic volumes and were found to be acceptable based on the current and future conditions. The parking review indicates that the proposed parking supply exceeds the minimum requirements of the Town of Cobourg Zoning By-law. Considering the future parking needs on the site, the parking supply was deemed acceptable.

Given that the traffic volumes generated by the site is expected to be relatively similar to the existing site and that the parking supply is in excess of the estimated future needs, the Traffic and Parking Brief recommends that the proposed use of a Residential Treatment Facility can proceed on the subject property.





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## 7. PLANNING POLICY CONTEXT



## 7.1 PLANNING ACT

The following sections outline the applicable planning policy regime and evaluation of the proposed use of a Residential Treatment Facility, in the context of the planning framework. The following policies have been considered: the Planning Act, Provincial Policy Statement (2020), A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019), the County of Northumberland Official Plan (2016), the Town of Cobourg Official Plan (2010), and the Town of Cobourg Zoning By-law 85-2003.

In consideration of the proposed land use planning application, Section 2 of the Planning Act must be considered as it provides the general direction to all land use planning decisions made in the Province of Ontario.

### Section 2 – Provincial Interest

*The Minister, the council of a municipality, a local board, a planning board and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as,*

- (a) the protection of ecological systems, including natural areas, features and functions;*
- (b) the protection of the agricultural resources of the Province;*
- (c) the conservation and management of natural resources and the mineral resource base;*
- (d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;*
- (e) the supply, efficient use and conservation of energy and water;*
- (f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;*
- (g) the minimization of waste;*
- (h) the orderly development of safe and healthy communities;*
  - (h.1) the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;*
- (i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;*
- (j) the adequate provision of a full range of housing, including affordable housing;*



- (k) *the adequate provision of employment opportunities;*
- (l) *the protection of the financial and economic well-being of the Province and its municipalities;*
- (m) *the co-ordination of planning activities of public bodies;*
- (n) *the resolution of planning conflicts involving public and private interests;*
- (o) *the protection of public health and safety;*
- (p) *the appropriate location of growth and development;*
- (q) *the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;*
- (r) *the promotion of built form that,*
  - (i) *is well-designed,*
  - (ii) *encourages a sense of place, and*
  - (iii) *provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;*
- (s) *the mitigation of greenhouse gas emissions and adaptation to a changing climate. 1994, c. 23, s. 5; 1996, c. 4, s. 2; 2001, c. 32, s. 31 (1); 2006, c. 23, s. 3; 2011, c. 6, Sched. 2, s. 1; 2015, c. 26, s. 12; 2017, c. 10, Sched. 4, s. 11 (1); 2017, c. 23, Sched. 5, s. 80.*

The policies and direction of Section 2 of the Planning Act inform the Provincial Policy Statement and matters of provincial interest, thereby ensuring that consistency with the PPS equates to consistency with Section 2. The Provincial Policy Statement is given consideration in Section 7.2 of this report. In our opinion the proposal has regard to matters of provincial interest.



## 7.2 PROVINCIAL POLICY STATEMENT (2020)

The Provincial Policy Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. As a key part of Ontario's policy-led planning system, the PPS sets the policy foundation for regulating the development and use of land. It also supports the provincial goal to enhance the quality of life for all Ontarians. This PPS was issued under Section 3 of the Planning Act and came into effect May 1, 2020. It replaces the PPS issued April 30, 2014. The PPS aims to permit appropriate development while ensuring that resources of provincial interest, public health and safety, and the quality of the natural environment are protected. All planning decisions in Ontario must be consistent with the PPS.

The PPS encourages efficient land use planning and growth management to create and maintain strong communities and a healthy environment while encouraging economic growth over the long term. The PPS also encourages the efficient use of existing infrastructure and public service facilities and requires that municipalities plan for an appropriate range and mix of land uses throughout the Province. The subject site is located within the Town of Cobourg, which is considered a Settlement Area. The PPS directs that the majority of the Province's growth and long-term investment is to occur within Settlement Areas.

The PPS 2020 works to implement changes to the land use planning system, including changes to the Planning Act through the More Homes, More Choice Act (2019) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe. Together, these policy documents support and implement the Provincial Government's desire to increase the supply of housing, support employment opportunities, and to make housing more affordable.

Section 1.0 of the Provincial Policy Statement provides direction related to "Building Strong Healthy Communities" and is applicable to the subject property. It generally encourages a variety of land uses within communities and encourages initiatives that make efficient use of infrastructure.

### 1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns

Section 1.1.1 includes general requirements for development in Ontario:

*1.1.1. Healthy, liveable and safe communities are sustained by:*

- a) Promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;*
- b) Accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;*
- c) Avoiding development and land use patterns which may cause environmental or public health and safety concerns;*
- d) Avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas;*
- e) Promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;*
- f) Improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society;*
- g) Ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;*
- h) Promoting development and land use patterns that conserve biodiversity; and*
- i) Preparing for the regional and local impacts of a changing climate.*



In accordance with Section 1.1.1, the proposed Residential Treatment Facility will occupy the existing Woodlawn Country Inn and Restaurant, thereby, efficiently utilizing land, infrastructure and public service facilities. The proposal incorporates a diversified use which adds to the existing range and mix of land uses in the community.

### 1.1.3 Settlement Areas

As noted earlier, the subject site is located within a Settlement Area. The PPS identifies Settlement Areas as being the focus for growth and development within Ontario. Section 1.1.3.2 of the PPS states that *"Land use patterns within settlement areas shall be based on densities and a mix of land uses which:*

- a) efficiently use land and resources;*
- b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;*
- c) minimize negative impacts to air quality and climate change, and promote energy efficiency;*
- d) prepare for the impacts of a changing climate;*
- e) support active transportation;*
- f) are transit-supportive, where transit is planned, exists or may be developed, and,*
- g) are freight-supportive*

Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.

Section 1.1.3.3 states that *"Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs."*

Further, Section 1.1.3.5 of the PPS directs planning authorities to *"establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions. However, where provincial targets are established through provincial plans, the provincial target shall represent the minimum target for affected areas."*

The proposed conversion of the existing Woodlawn Country Inn and Restaurant to a Residential Treatment Facility represents a form of redevelopment by repurposing the existing building on the subject lands. The proposed use is consistent with the objectives of the PPS as it promotes the redevelopment of an existing building to facilitate a compact form where infrastructure and public services are already in place.

### 1.3 Employment

Policies addressing employment are outlined in Section 1.3. The PPS encourages the promotion of economic development. The following policies are relevant to the proposal:

*1.3.1 Planning authorities shall promote economic development and competitiveness by:*

- a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
- b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
- c) facilitating the conditions for economic investment by identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*
- d) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, with consideration of housing policy 1.4; and*
- e) ensuring the necessary infrastructure is provided to support current and projected needs.*



The PPS encourages a diversified economic base that allows for a variety of employment opportunities. The proposed Residential Treatment Facility will allow for employment opportunities for the existing residents of the Town of Cobourg. Additionally, the Residential Treatment Facility will provide a new service that will support the existing community.

#### 1.6 Infrastructure and Public Service Facilities

The infrastructure policies of the PPS are outlined in Section 1.6. Existing infrastructure and public service facilities are to be maximized, wherever possible, before developing new infrastructure. Planning for infrastructure and public service facilities shall also be integrated with planning for redevelopment so that infrastructure and facilities are available to meet current and projected needs as outlined in the policies below.

*1.6.1 Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs.*

*Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they are:*

- a) financially viable over their life cycle, which may be demonstrated through asset management planning; and*
- b) available to meet current and projected needs.*

*1.6.3. Before consideration is given to developing new infrastructure and public service facilities:*

- a) The use of existing infrastructure and public service facilities should be optimized; and,*
- b) Opportunities for adaptive re-use should be considered, wherever feasible.*

*1.6.6.1. Planning for sewage and water services shall:*

- a) accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing:
 
  - 1. municipal sewage services and municipal water services; and*
  - 2. private communal sewage services and private communal water services, where municipal sewage services and municipal water services are not available or feasible;**
- b) ensure that these systems are provided in a manner that:
 
  - 1. can be sustained by the water resources upon which such services rely;*
  - 2. prepares for the impacts of a changing climate;*
  - 3. is feasible and financially viable over their lifecycle; and*
  - 4. protects human health and safety, and the natural environment;**
- c) promote water conservation and water use efficiency;*
- d) integrate servicing and land use considerations at all stages of the planning process; and*
- e) be in accordance with the servicing hierarchy outlined through policies 1.6.6.2, 1.6.6.3, 1.6.6.4 and 1.6.6.5. For clarity, where municipal sewage services and municipal water services are not available, planned or feasible, planning authorities have the ability to consider the use of the servicing options set out through policies 1.6.6.3, 1.6.6.4, and 1.6.6.5 provided that the specified conditions are met. 1.6.6.2 Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas. Intensification and redevelopment within settlement areas on existing municipal sewage services and municipal water services should be promoted, wherever feasible.*



1.6.6.7 Planning for stormwater management shall:

- a) *be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;*
- b) *minimize, or, where possible, prevent increases in contaminant loads;*
- c) *minimize erosion and changes in water balance, and prepare for the impacts of a changing climate through the effective management of stormwater, including the use of green infrastructure;*
- d) *mitigate risks to human health, safety, property and the environment;*
- e) *maximize the extent and function of vegetative and pervious surfaces; and*
- f) *promote stormwater management best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development.*

The proposal will utilize both existing municipal sewage services and municipal water services in a manner that protects human health and the natural environment. Furthermore, the existing municipal infrastructure can support the proposed use of a Residential Treatment Facility.

The PPS also provides direction on matters relating to Waste Management and Energy Supply in Section 1.6.10 and 1.6.11, respectively. The proposed Residential Treatment Facility will implement a waste management system that is appropriate in size and type to accommodate present and future waste management requirements. Additionally, the proposed interior modifications will be designed to promote energy efficiency where feasible. The proposed use of a Residential Treatment Facility is consistent with the PPS policies in this regard.

Section 1.7 of the PPS provides policy direction on matters of provincial interest regarding development that ensures the long-term economic prosperity by:

- a) *promoting opportunities for economic development and community investment-readiness;*
- b) *encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce;*
- c) *optimizing the long-term availability and use of land, resources, infrastructure and public service facilities;*
- d) *maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets;*
- e) *encouraging a sense of place, by promoting well-designed built form and cultural planning, and by conserving features that help define character, including built heritage resources and cultural heritage landscapes;*
- f) *promoting the redevelopment of brownfield sites;*
- g) *providing for an efficient, cost-effective, reliable multimodal transportation system that is integrated with adjacent systems and those of other jurisdictions, and is appropriate to address projected needs to support the movement of goods and people;*
- h) *providing opportunities for sustainable tourism development;*
- i) *sustaining and enhancing the viability of the agricultural system through protecting agricultural resources, minimizing land use conflicts, providing opportunities to support local food, and maintaining and improving the agrifood network;*
- j) *promoting energy conservation and providing opportunities for increased energy supply;*
- k) *minimizing negative impacts from a changing climate and considering the ecological benefits provided by nature; and*
- l) *encouraging efficient and coordinated communications and telecommunications infrastructure.*



The subject site is located within a built-up Settlement Area. As such, the proposal will achieve long term economic prosperity by maximizing the use of existing infrastructure, services, land and utilities available within the area. The proposal will maintain the existing Woodlawn Inn and Restaurant building to be repurposed as a Residential Treatment Facility.

#### Summary

Based on our review of the applicable policies, it is our opinion that the proposed Residential Treatment Facility is consistent with the PPS, as it is located within a Settlement Area, contributes to the range and mix of land uses, and efficiently utilizes existing access and servicing. The proposed use of a Residential Treatment Facility will not result in development or additions to the existing building on the subject property.



## 7.3 A PLACE TO GROW: GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE (2019)

While the PPS provides overall policy direction related to matters of provincial interest, the Growth Plan for the Greater Golden Horseshoe (the “Growth Plan”) provides direction on the development and growth of communities within the Greater Golden Horseshoe (“GGH”). The Growth Plan released by the Province in 2006, and recently updated in 2019, provides further direction on the management of growth within the Greater Golden Horseshoe.

The intent of the Growth Plan is to achieve the development of compact vibrant communities and to plan and manage growth in order to support a strong and competitive economy in the Greater Golden Horseshoe.

The Growth Plan is read in conjunction with the PPS. In instances where policies of the Plan address a similar matter or there is overlap, the more specific direction of the Growth Plan is to be considered, rather than the more general policies of the PPS. The proposed development must comply with the 2019 Growth Plan.

Section 1.2.1 of the Growth Plan provides a set of guiding principles to guide the province’s vision for the GGH. The following summarizes the guiding principles of the Growth Plan that are particularly relevant to the proposed use of a Residential Treatment Facility:

- *Support the achievement of complete communities that are designed to support healthy and active living and meet people’s needs for daily living throughout an entire lifetime.*

Section 2.2.1 provides policy direction for the management of growth through development. The GGH further states that better use of land and infrastructure can be made by directing growth to settlement areas and prioritizing intensification, with a focus on strategic growth areas, including growth centres and major transit station areas as well as brownfield sites and greyfield sites.

The proposal contributes to the diversity of uses within the Town of Cobourg by converting the existing Woodlawn Inn and Restaurant into a Residential Treatment Facility, while maintain the existing interior and exterior built form. The proposed use of a Residential Treatment Facility will contribute an aspect to the creation of a complete community within the Town of Cobourg.

### Where and How to Grow

Section 2.2 of the Growth Plan addresses managing growth and the determination of how and where to grow. The purpose of this section of the Growth Plan is to provide direction to manage growth in a manner which ensures better use of land and infrastructure and encourages a compact built form throughout the GGH. Within the built-up area, the Plan will support the achievement of complete communities. The following policies of Section 2.2 are applicable to the proposed use and redevelopment:

- a) feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities;*
- b) improve social equity and overall quality of life, including human health, for people of all ages, abilities, and incomes;*



The proposed Residential Treatment Facility contributes to the diverse mix of land uses within the Town of Cobourg. The application intends to convert the existing 18 room Woodlawn Country Inn and Restaurant to house 40 patients (two to three per room) as part of a privately-owned, treatment facility specializing in addiction recovery. The Residential Treatment Facility will provide lodging, meals and therapy counselling for the patients.

The application intends to maintain the existing building on site, as the current building is of sufficient size to accommodate the proposed use, without the need to enlarge the existing structure.

Section 3.2 outlines policies for infrastructure to support growth and policy 3.2.1 states that *“Infrastructure planning, land use planning, and infrastructure investment will be co-ordinated to implement this Plan”*. The proposal conforms to this policy as essential sewage, water and stormwater infrastructure is available to service the subject lands.

## Summary

The Growth Plan promotes redevelopment through intensification, generally throughout the built-up area, and specifically recognizes the need for more efficient utilization of lands, compact form and supports the principle of higher densities in appropriate areas, where infrastructure and transit services are available. The proposed conversion of the existing building at 420 Division Street would provide a new 18 room Residential Treatment Facility. The proposal supports the policies and objectives of the Growth Plan by efficiently using land within the existing settlement and built-up area. It will also contribute a mixture and diverse range of land uses within the existing community.

In summary, the proposal conforms to the policies outlined in the Growth Plan as it promotes a form of adaptive re-use of an existing building and will optimize existing infrastructure and transit services. It is our opinion that the proposal conforms to the policies of the Growth Plan for the Greater Golden Horseshoe.



## 7.4 COUNTY OF NORTHUMBERLAND OFFICIAL PLAN (2016)

The County of Northumberland Official Plan (CNOP) was approved on November 23, 2016 by the Ontario Municipal Board (OMB). The CNOP provides a broad policy framework, addressing provincial direction, and providing additional criteria on a number of regional matters including: accommodation of population and economic growth through intensification, providing access to transportation modes while promoting human interaction, and creating opportunities for physical activity. A primary objective of the CNOP is to direct growth to existing built-up portions of urban areas.

### Section A – Vision, Guiding Principles and Land Use Concept

Section A of the CNOP outlines the vision of the County. The guiding principles that form the basis of the Plan are derived from the vision and establish a framework for the goals, objectives and policies of the Plan. The following guiding principles are applicable to the proposal:

1. *To recognize that the County is made up of a number of communities of different sizes and identities that all combine to establish Northumberland's identity as a desirable place to live, establish roots, learn and create diverse economic opportunities.*
3. *To direct most forms of development to urban areas where full services are available and to support the efficient use of land and infrastructure to meet the needs of present and future residents and businesses and ensure that an adequate supply of land and housing choices are available for present and future residents.*
4. *To protect and enhance the character of existing urban areas and rural settlement areas, and to maintain them as diverse, livable, safe, thriving and attractive communities.*

The *Settlement Areas* in the County are divided into urban areas, which consist of the six *Urban Areas* that have built boundaries and thirty-nine other *Settlement Areas* that are considered to be *Rural Settlement Areas*. The subject property is located in the Town of Cobourg, which is designated as an *Urban Area*, and has access to full services. The proposed Residential Treatment Facility will make efficient use of existing services and will introduce a new service to the community, supporting the needs of current and future residents. Additionally, the character of the existing *Urban Area* will be protected, as no external changes have been proposed for the existing building on site.

### Section C – Land Use Designations

Section C of the CNOP speaks to the goals, objectives and policies with respect to the five land use designations on Schedule A. The subject property is designated *Urban Area* within the Town of Cobourg (Figure 3).

Section C1.1 speaks to the creation of complete communities within the County's six *Urban Areas*. The following policies are applicable to the subject property and the proposal:

- a) *A strong live/work ratio, where the majority of residents are employed in the community in which they live;*
- e) *A range of health care services for the majority of the residents;*
- f) *A range of community and social services to assist the majority of those in need in the community;*

The proposed Residential Treatment Facility will offer a private health care service that provides lodging, meals and therapy counselling for men and women recovering from addiction. The proposed use provides a service that will assist those in need within the community and greater surrounding area. Additionally, the facility will provide job opportunities for the Town of Cobourg, as it is anticipated that a total of 12 staff will be present during the day and 6 staff will be present over night.



Section C1.2.2 speaks to Commercial Areas within the County. The following policies are applicable to the proposal:

- c) *Promote the efficient use of existing and planned infrastructure by creating the opportunity for various forms of commercial and residential intensification, where appropriate;*

The proposed Residential Treatment Facility is will add a unique institutional use to the commercial area within the Town of Cobourg. As a private health care service, the facility will assist those in need within the community. Through the use of the existing building, the existing built form will not be changed. The proposed change of use will result in the efficient use of existing infrastructure, as the currently building is fully serviced by existing infrastructure.

## Summary

In summary, it is our opinion that the proposed use of a Residential Treatment Facility conforms to the vision, guiding principles and land use planning policies of the County of Northumberland. The subject property is located within the *Settlement Area* of Cobourg and is designated as an *Urban Area*. Additionally, the built form and character of the building will not be changed as modifications are not proposed for the interior and exterior, maintaining the existing character of the surrounding community. The site has full access to all necessary servicing infrastructure. Additionally, it is important to note that the addition of the Residential Treatment Facility will contribute to the variety of uses within the County, offering a private health care service to assist those recovering from addiction.



Figure 3: County Official Plan Schedule A – Land Use



## 7.5 TOWN OF COBOURG OFFICIAL PLAN (2018 CONSOLIDATION)

The Town of Cobourg Official Plan (2018 Consolidation) was adopted by Council in May 2010 and approved by the Minister of Municipal Affairs and Housing in December 2011. In May 2017, the Official Plan was approved by the OMB. The Official Plan provides a long range blueprint to guide future land use development and manage growth within the Town.

### Section 3 – Land Use Strategy

The land use framework set out in the Official Plan is informed by, and aligns with, the principles of sustainable community development. The Plan recognizes that growth presents challenges and opportunities. The Town of Cobourg is a Regional Centre for Northumberland County and its vision is an emphasis for sustainable, accessible and compact development, which is particularly transit supportive and provides for mixed-use built form along its main streets, enabling Cobourg to enhance its function as a vibrant, environmentally aware urban centre.

Schedule A of the Official Plan establishes the general pattern of development for the existing and future use of the planning area. The subject property is designated as *Mixed Use Corridor Area* on Schedule A (Figure 4).

### Section 3.9 – Mixed Use Area

Section 3.9 of the Official Plan speaks to the purpose of the *Mixed Use Area* designation:

#### 3.9.1 Purpose

*The Mixed Use Area designation recognizes those existing commercial areas which are oriented to the service of vehicular traffic and require direct access from arterial roads and the exposure afforded by such a location. The designation is designed to recognize those existing uses, while providing for the transition of these areas to a mixed use development form by encouraging the introduction of a range of additional compatible non-commercial uses to intensify and enhance the use of these areas which are generally located at major entrances to the community.*

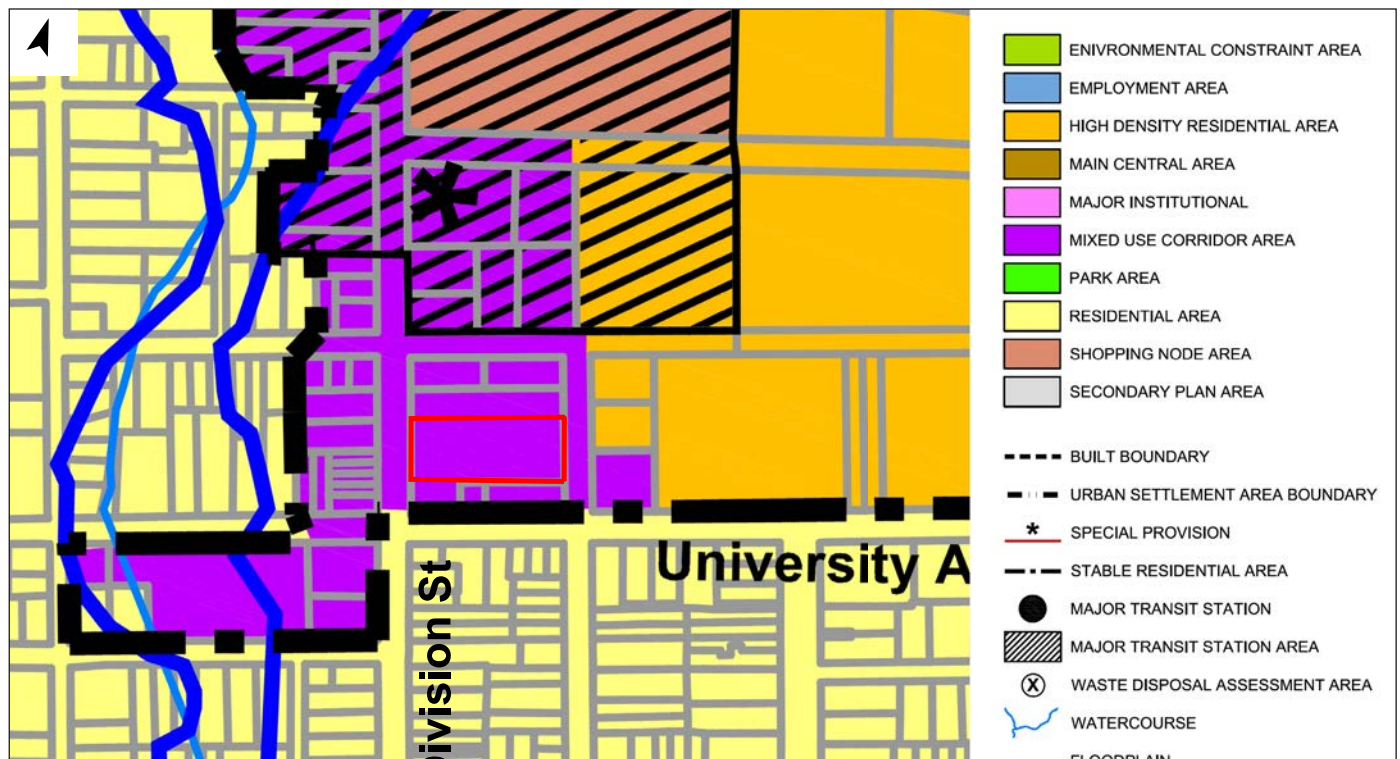


Figure 4: Official Plan Schedule A – Land Use



Section 3.9.2 outlines the permitted uses within the *Mixed Use Area* designation:

*The permitted uses, buildings and structures are:*

- i) *commercial other than a commercial use prohibited by Section 3.9.3;*
- ii) *institutional;*
- iii) *light industrial in an enclosed building;*
- iv) *office; and,*
- v) *residential subject to the policies of Section 3.9.4.3 or as secondary uses in a commercial building.*

It is important to note that the *Mixed Use Area* designation permits the use of a “Residential Treatment Facility”, which can be classified as a private institutional use as it is a fee-based service, privately owned and run by the Canadian Centre for Addictions.

## Section 6 – Transportation Strategy

Schedule E – Road Network Plan and the policies in Section 6 of the Official Plan allow for the development of a transportation network, which provides for the safe, economic and efficient movement of people and goods. Schedule E designates Division Street as an *Existing Arterial* and John Street as a *Local Road*. The Traffic and Parking Brief prepared by Trans-Plan Transportation Engineering states that the current and future traffic volumes generated by the site is expected to be relatively similar to the existing site use.

## Section 7 – Municipal Infrastructure Strategy

Section 7 of the Official Plan establishes policies to ensure that the “*type and level of infrastructure required to support the existing and proposed land use pattern*” is available. The Functional Servicing Brief prepared by Crozier Engineering supports the proposed use of a Residential Treatment Facility, as there is ample servicing available for the proposed use.

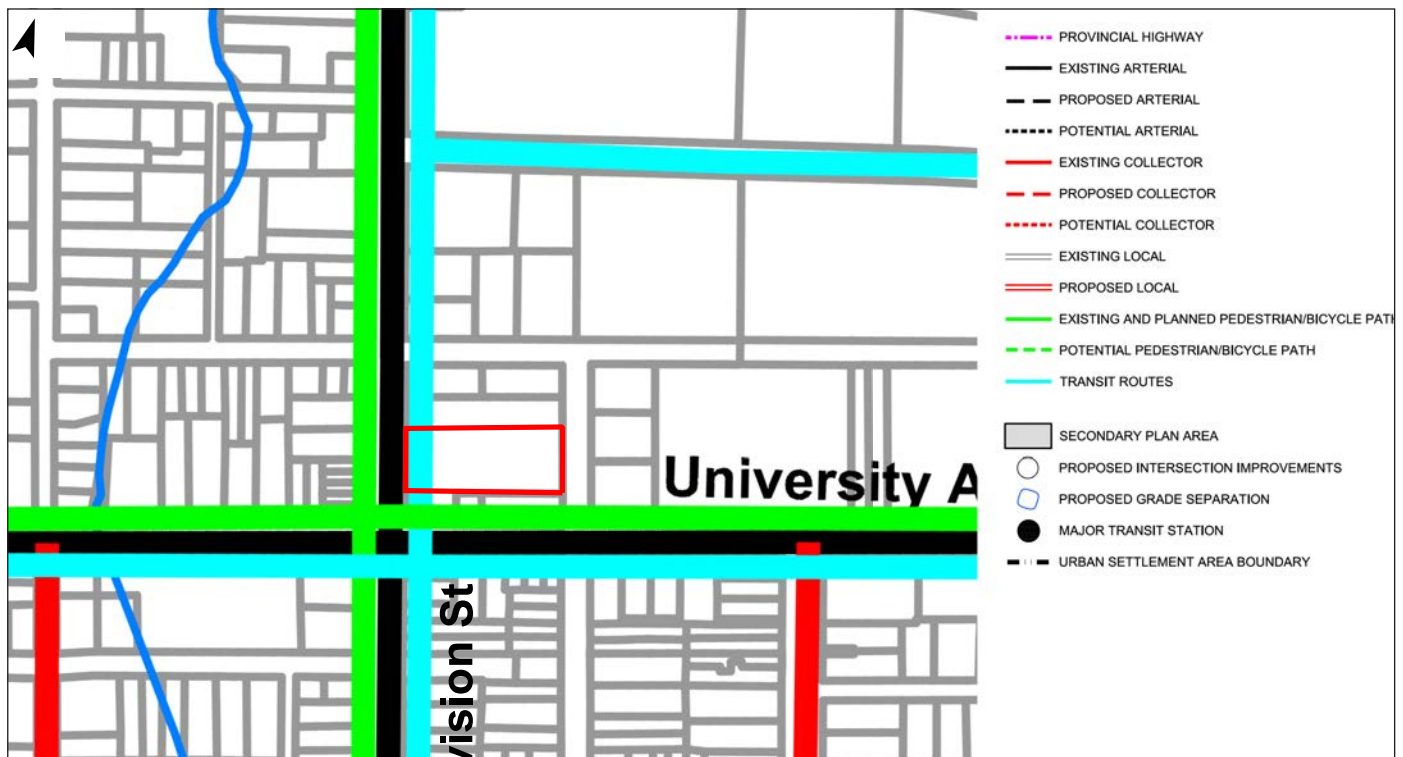


Figure 5: Official Plan Schedule E – Road Network Plan



## Summary

In summary, we are of the opinion that the proposed use of a Residential Treatment Facility conforms to the vision, guiding principles and land use planning policies of the Town's Official Plan. The subject property is designated Mixed Use Corridor Area and the proposed re-use of the property will enhance the vision for sustainable, accessible and compact development, particularly transit supportive measures. The re-use provides for mixed-use built form along a main street, enabling Cobourg to enhance its function as a vibrant, environmentally aware urban centre. Additionally, as previously mentioned,

the built form and character of the building will not be changed as modifications are only proposed for the interior, maintaining the existing character of the building and surrounding community. Supporting studies have illustrated that the site has full access to existing servicing infrastructure and the parking and traffic related to the site will be similar in nature. Lastly, the re-use of the building will contribute to the variety of uses within the County, offering a private health care service to assist those recovering from addiction.

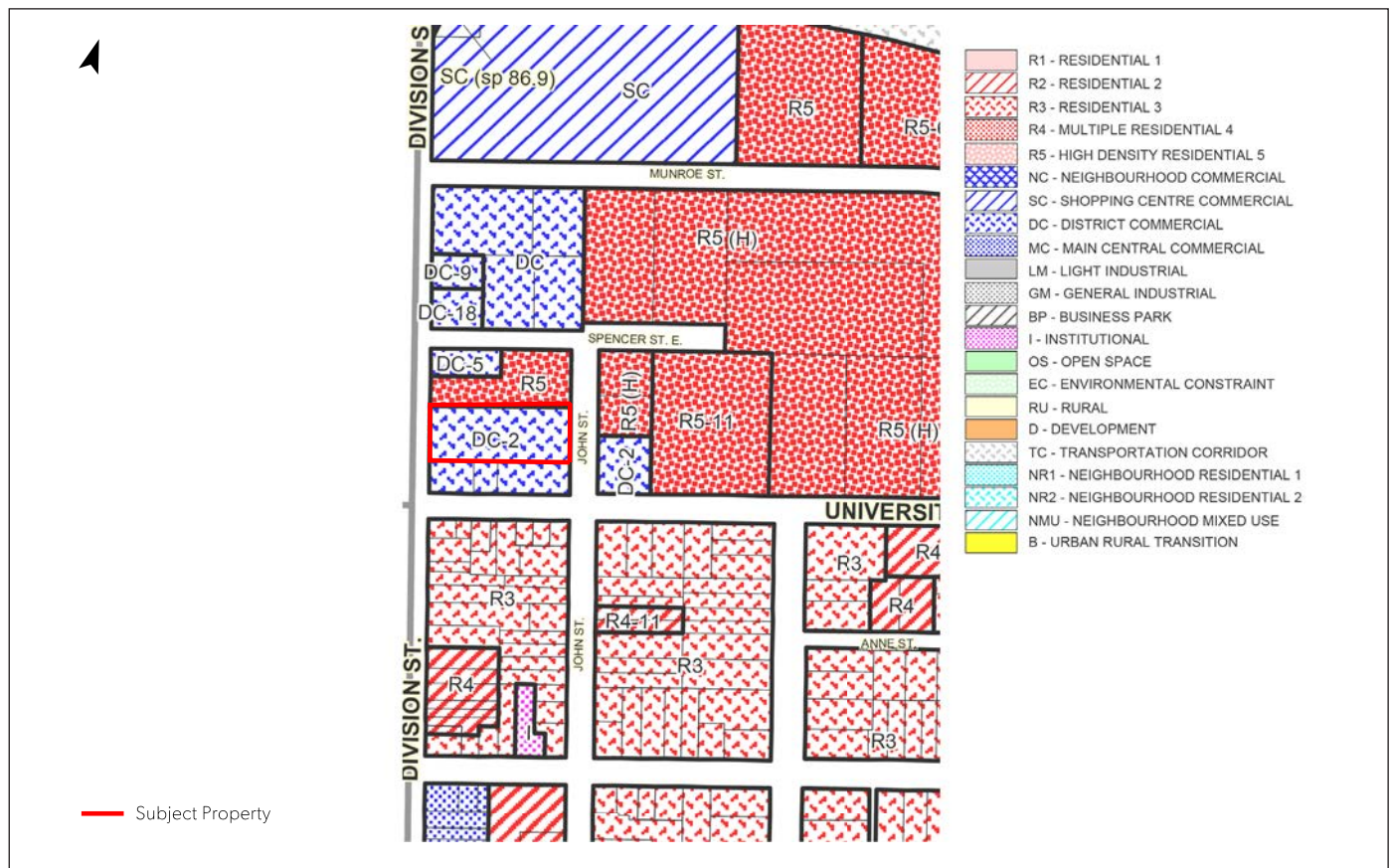


Figure 6: Official Plan Schedule A – Land Use



## 7.6 TOWN OF COBOURG ZONING BY-LAW 85-2003

The Town of Cobourg Zoning By-law 85-2003 zones the subject property as *District Commercial (DC-2)*. The 'DC' zone permits a variety of commercial, retail and institutional uses. The subject property is subject to a "-1" suffix zone, which imposes special use regulations pertaining to landscaped open space, parking, side yard setbacks, and front and rear yard setbacks. The existing Woodlawn Country Inn and Restaurant is permitted within the 'DC' zone.

It is important to note that the existing *DC-2 Zone* does not permit the use of a "Residential Treatment Facility". A Zoning By-law Amendment application is required to allow for a "Residential Treatment Facility" as a permitted use.

DC-2 Zoning Provisions	Section	Requirement
Minimum Lot Frontage	14.1.6	25 metres
Minimum Lot Area	14.1.5	740 square metre
Maximum Lot Coverage	14.1.7	30%
Minimum Front and Rear Yard	14.2.2.4 iii)	3.0 metres
Minimum Side Yard	14.2.2.4 iv)	1.0 metres
Maximum Height of Building or Structures	14.1.13	4 storeys
Maximum FSI	14.1.14	1.0
Landscaped Open Space	14.2.2.4i)	Minimum 15% of the lot
Parking	14.2.2.4 ii)	In accordance with the provisions of Section 6. except that all parking shall be prohibited in the front yard.

*Table 1: DC-2 Zoning Provisions*





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## 8. DRAFT ZONING BY-LAW AMENDMENT



A Zoning By-law Amendment is required to facilitate the use of a "Residential Treatment Facility" on the subject property. It is proposed that the subject property be rezoned to DC-X, with site specific exceptions to allow for a "Residential Treatment Facility". "Residential Treatment Facility" is defined as the following:

*A privately owned, fee-based premises, used for the care or treatment of individuals suffering from a substance addiction, which provides treatment in the form of lodging, meals and therapy (counselling, yoga, exercise). Said facility contains administrative offices to house facility staff.*

Please find enclosed the Draft Zoning By-law Amendment, under separate cover, which is required to permit a "Residential Treatment Facility" as a permitted use in the Town of Cobourg Zoning By-law 85-2003, as outlined.





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## 9. PLANNING ANALYSIS AND JUSTIFICATION

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## 9.1 PLANNING POLICY CONTEXT

The proposed use of a Residential Treatment Facility is consistent with the Provincial Policy Statement (2014), conforms to the Growth Plan for the Greater Golden Horseshoe (2019), as well as the County of Northumberland Official Plan (2016) and Town of Cobourg Official Plan (2018 Consolidation). The proposed use is consistent with and conforms to policies pertaining to efficient use of land and infrastructure, application of a range and mix of uses, and efficient use of transportation infrastructure.

The proposed use is consistent with the PPS. The subject property is located within the *Settlement Area* of the Town of Cobourg. The proposed application of a Residential Treatment Facility would contribute to the range and mix of land uses within the *Settlement Area*, contributing to the creation of a healthy, livable and safe community. The proposed conversion of the existing building will continue to efficiently utilize land, resources, transportation infrastructure and existing storm drainage and sanitary systems.

It is our opinion that the proposed use conforms to the policies of the Growth Plan as it promotes a form of adaptive re-use of an existing building. This presents the opportunity to optimize the existing infrastructure and surrounding transportation network. The proposed use of the existing building allows for efficient use of land within the existing settlement and built-up area.

It is our opinion that the application of a Residential Treatment Facility is consistent with the policies of the County of Northumberland Official Plan and Town of Cobourg Official Plan. The existing building on the subject property will continue to contribute to the existing character of the surrounding community, maintaining the built form and character of the site. The site has full access to all necessary servicing infrastructure and is well connected to the surrounding transportation infrastructure. The addition of the proposed use of a Residential Treatment Facility will contribute to the range and mix of uses through the application of a private health institution.



## 9.2 TRANSPORTATION

The proposed Residential Treatment Facility will make efficient use of the surrounding road network, which identifies Division Street as an *Existing Arterial Road* and John Street as a *Local Road*. Direct access to the site will be provided off of both Division Street and John Street, allowing future employees and patients to access the site. The Traffic Brief prepared by Trans-Plan Transportation Engineering states that traffic volumes generated by the site are expected to be relatively similar to the existing site and that the parking supply is in excess of the estimated future needs, recommending that the proposed use of a Residential Treatment Facility can proceed on the subject property.



### 9.3 Efficient Use of Infrastructure

The land use planning policy applicable to the subject property encourages redevelopment through the efficient use of lands, where infrastructure is accessible and available. These policies support redevelopment within settlement areas for the provision of a range and mix of uses. The land use planning policy in place recognizes that the achievement of complete communities within settlement areas requires redevelopment in areas that are well serviced by existing infrastructure. Based on the findings on the Functional Servicing Brief prepared by Crozier Engineering, proposed Residential Treatment Facility will utilize both existing municipal sewage services and municipal water services in a manner that protects human health and the natural environment.





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## 10. CONCLUSION



Based on our review of the existing and planned context, planning policy and supporting materials, it is our opinion that the proposed Residential Treatment Facility and associated application for a Zoning By-law Amendment are based on good planning and urban design principles and will be compatible the character of the neighbourhood by introducing a new institutional use within the community. The proposal intends to maintain the existing building which is already consistent with existing built form characteristics. It is our opinion that the proposal and associated planning application should proceed through the process prescribed by the Planning Act.





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