



THE CORPORATION OF THE TOWN OF COBOURG

Report to:	Mayor and Council Members	Priority:	☐ High ⊠ Low			
Submitted by:	Rob Franklin, MCIP, RPP Manager of Planning	Meeting Type:				
	rfranklin@cobourg.ca	Open Session				
		Closed Session □				
Meeting Date:	February 16, 2021					
Report No.:	Planning File: Z-04-20 PLL File: ZB-2020-003 (4085)					
Submit comments to Council						

Subject/Title: Application for Zoning By-law Amendment, Weston Consulting Inc. on

behalf of 2759655 Ontario Ltd./Canadian Centre For Addictions, 420

Division Street, Cobourg

RECOMMENDATION:

THAT Council receive this Report for information purposes; and

FURTHER THAT Council endorse the By-law attached as <u>Appendix VI</u> which rezones the 0.38 ha (0.94 ac) parcel of land at 420 Division Street from "District Commercial Exception 2 (DC-2) Zone" to "District Commercial Exception 29 Holding [DC-29(H)] Zone" to permit the adaptive re-use of the former Inn/Hotel and restaurant as a Rehabilitation/Detox Treatment Centre with site specific zone provisions governing the proposed land use, facility capacity and parking.

1. STRATEGIC PLAN

N/A

2. PUBLIC ENGAGEMENT

An application for Zoning By-law Amendment was submitted by Weston Consulting Inc. on behalf of the 2759655 Ontario Ltd./Canadian Centre For Addictions in September 2020 for the Subject Lands.

On October 13, 2020, Council formally received the application for Zoning By-law Amendment. The application was referred to the Planning Department for a report, and a Public Meeting was held on November 30, 2020 in accordance with the provisions

of the Planning Act, RSO 1990, c.P.13, as amended. The applicant also convened a virtual Public Information Meeting/Open House on November 18, 2020 in accordance with Council's procedures for public engagement.

Section 34 of the *Planning Act* prescribes Statutory notice requirements for a complete Zoning By-law Amendment application, and for the scheduling of a Public Meeting. Notice of a complete Zoning By-law Amendment application 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 frontages of the property (Division Street and John Street), 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). Members of the public on record as making submissions to the Town will be notified when the application

3. PURPOSE

To re-zones the 0.38 ha (0.94 ac) parcel of land at 420 Division Street from "District Commercial Exception 2 (DC-2) Zone" to "District Commercial Exception 29 Holding (DC-29-H) Zone" to permit the adaptive re-use of the former Inn/Hotel and restaurant as a Rehabilitation/Detox Treatment Centre.

4. ORIGIN AND LEGISLATION

An application for approval of a Zoning By-law Amendment was submitted by Weston Consulting Inc. on behalf of 2759655 Ontario Ltd. and the Canadian Centre For Addictions (CCFA) in September of 2020. At its meeting held on October 13, 2020, Council moved that the application be received and referred to the Planning Department for a report, and further directed that the Public Meeting be scheduled. A virtual Open House was convened by Weston Consulting Inc. on November 18, 2020 and a Public Meeting of Council was convened on November 30, 2020 regarding this application. A number of public submissions have been received by the Municipality regarding the application.

In accordance with the *Planning Act*, if Council has not made a decision within 90 days of its receipt as a Complete Application by Council, the applicant may appeal the application to the Local Planning Appeal Tribunal (LPAT).

5.1 Owner

2759655 Ontario Ltd., o/a Canadian Centre for Addictions (CCFA)

5.2 Applicant/Agent

Ryan Guetter - Weston Consulting Inc.

5.3 Property Address

The subject lands front onto Division Street and are located just north of University Avenue East at 420 Division Street (see *Figure 1* – *Site Location Map* below).



Figure 1 – Site Location Map

5.4 Existing Land Uses

The subject lands are currently occupied by a vacant commercial Inn and restaurant with eighteen (18) rooms/suites.

5.5 <u>Surrounding Land Uses</u>

The land uses in the vicinity of the subject property generally consist of a mix of residential, institutional and commercial land uses.

North: commercial

East: medium density residential, institutional South: commercial, low-medium density residential

West: low-medium density residential, commercial and institutional

5.6 Proposal

The subject lands are currently occupied by a vacant Inn consisting of eighteen residential suites, a dining room/restaurant, meeting room, bar and commercial kitchen (formerly known as the Woodlawn Inn). Based on the information supplied by the proponent, the proposal is to convert the existing 18 guest room Inn into a privately-owned, fee-based treatment centre with a maximum of forty (40) client beds plus staff, for treatment and counselling of those dealing with drug and alcohol addiction. No exterior changes are proposed to the building or property other than signage and security/fencing.

Specifically, the background information indicates that CCFA is a company that specializes in helping those who suffer from addiction to learn the skills required to successfully live an addiction-free lifestyle. The proposed facility would accept patrons on a private, appointment-only and "fee-for-service" basis – it is not publicly-funded nor do they accept referrals from the judicial system. Patrons will occupy the centre full time for a period ranging from several weeks to a number of months and obtain various levels of treatment from a team of addiction counsellors and therapists based on their individual needs. The information supplied indicates that the facility is <u>not</u> a safe injection site nor a drop-in centre, although some limited daily rehabilitation counselling services may be provided on a fee basis should there be a need in the community.

CCFA currently operates a similar facility on Dorset Street in Port Hope. The following treatment programs are being offered by CCFA:

- Detox and Withdrawal Management Services;
- Mental Health Support;
- One-on-One Counselling;
- Family Program and Counselling;
- Lifetime Aftercare;
- Relapse Prevention Program Guarantee; and,
- Evidence-based Statistical Reporting.

The proposed facility at 420 Division Street will house a maximum of 40 persons exclusive of staff, although 100% occupancy is not often attained. CCFA will staff the facility 24 hours per day, including 12 staff during the day and 6 overnight. The patients are not permitted to leave the facility (with the exception for extenuating circumstances ie. medical) and typically do not bring their own vehicles. Entry to the facility is voluntary and, thus, they are free to leave at any time however there are no In/Out privileges and once they have left the facility they are not permitted to re-enter with the exception of the aforementioned exceptional circumstances. Patrons leaving the facility are either picked up by receiving friends/family, or are transported by facility staff via arrangement.

Special COVID-19 protocols for both staff and patrons are proposed which meet and exceed public health guidelines, including mandatory negative testing/screening, PPE, social distancing and personal/facility hygiene and cleaning measures, to provide necessary infection and prevention controls. Video and tele-conferencing services are now being offered in lieu of in-person counselling as a result of COVID-19 based on the nature and extent of the patron's individual needs.

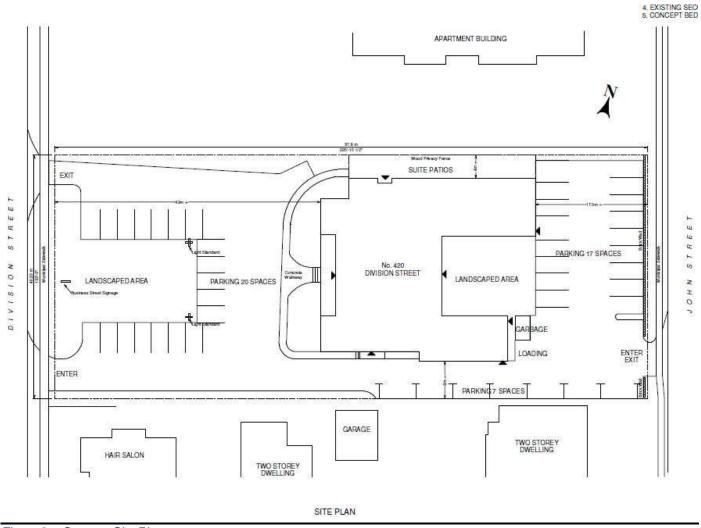


Figure 2 - Concept Site Plan

The subject lands are presently designated "Mixed Use Area" in the Cobourg Official Plan (2017) and zoned "District Commercial Exception Two (DC-2) Zone" in the Comprehensive Zoning By-law. The mixed use designation and commercial zoning permits an assortment of commercial uses, institutional uses, light industrial uses in an enclosed building, offices, and medium to high density residential uses or secondary residential uses in a commercial building.

The applicant submitted supporting studies in conjunction with the proposal, including:

- Planning Justification Report, Weston Consulting Inc., September 2020, revised November 2020;
- Fulsome Response to Comments, Weston Consulting Inc., December 2020;
- Comment Response Matrix, Weston Consulting Inc., December 2020;
- Architectural Drawings, Bruce MacNeil Architect, April 2020, updated December 2020;
- Traffic and Parking Brief, Trans-Plan Transportation Engineers, June, 2020;
- Sanitary Servicing Brief, Crozier Consulting Engineers, May 2020.

The above reports were circulated to and reviewed by municipal departmental staff and partner review agencies, including the Ganaraska Region Conservation Authority (the

"GRCA"), Cobourg Police Services (CPS), Lakefront Utility Services Inc. (LUSI), and the County of Northumberland (the "County"), as part of the development proposal review process.

For the purposes of the land use planning review and due to size, only the Planning Justification Report, Fulsome Response to Comments and a Comment Response Matrix have been appended to this Report. The following Appendices are attached:

- <u>Appendix I</u> Weston Consulting Planning Justification Report, Sept. 2020 (hereinafter referred to as the "Weston Planning Report");
- Appendix II Public Meeting Notes of November 30, 2020;
- <u>Appendix III</u> Weston Fulsome Response to Comments, Dec. 22, 2020 (hereinafter referred to as the "Weston Response Letter");
- Appendix IV Weston Comment Response Matrix;
- Appendix V Agency Comments;
- Appendix VI Draft Zoning By-law Amendment.

Copies of the relevant background reports may be found on the Planning & Development webpage at https://www.cobourg.ca/en/business-and-development/Planning-Applications.aspx.

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 Zoning By-law Amendment. The following provides an overview of the relevant background and commentary where required.

The background reports submitted with the subject application, particularly the Weston Planning Report, provide an overview of the subject application relative to relevant provincial and local policies and provide conclusions and opinions relating to 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 Zoning By-aw amendment include public notification, convening a Public Meeting, and awaiting an appeal period.

As referenced above, the Municipality shall have regard to matters of Provincial interest under Section 2 of the Act, and in considering the proposed land use, the following Provincial interests are relevant:

The orderly development of safe and healthy communities - because the location of these uses should be compatible with adjacent land uses

and the planned function of an area with public safety being a consideration while considering the needs of those who require these facilities in our society;

- The adequate provision and distribution of educational, health, social, cultural and recreational facilities because there is a general need for these facilities (public or private) to support social and physical well-being of residents;
- The resolution of planning conflicts involving public and private interests because of the potential conflicts that may exist when these facilities are sited near certain sensitive land uses;
- > The protection of public health and safety because of the need to ensure that those members of our society that require health services can access them with public safety always being a consideration;
- > The appropriate location of growth and development because there is a need to ensure that all land uses are located in appropriate areas that are suitable for the use with minimal impacts on the adjacent area.

Comment/Opinion

Municipal planning staff has reviewed the application in light of the aforementioned items of Provincial interest. The intended re-use of the subject building proposes to preserve the existing heritage building, would offer health and social service supports for individuals in need in a location that balances public safety and society's needs for rehabilitation services, and is located in a commercial district on a major arterial road in close proximity to transit and other community services. The site of the proposed use and the arrangement of the existing structure and parking facilities are compatible with adjacent land uses with the inclusion of appropriate buffering and security measures (ie. fencing) as part of any future site plan and development agreement.

In my planning opinion, the proposed Zoning By-law Amendment has appropriate regard to matters of Provincial interest under Section 2 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), 2020 & 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 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*.

The Weston Planning Report provides an overview of the key policies and principles as outlined by the Province in Sections 7.2 and 7.3 (pages 23-29).

In general, the primary directives of the documents include such issues as:

- fostering the development of complete communities which are strong, sustainable, liveable, healthy and vibrant, and which enhance human health and social wellbeing by accommodating a range and mix of uses, including institutional uses, to meet long-term needs;
- promoting efficient, cost-effective and transit-supportive land use and development patterns to minimize land consumption and servicing costs and support active transportation;
- facilitating intensification, redevelopment and compact built form;
- directing growth and development to urban settlement areas with full municipal services:
- conserving significant cultural heritage resources;
- improving social equity and overall quality of life, including human health, for people of all ages, abilities and incomes;
- avoiding development and land use patterns which may cause environmental or public health and safety concerns; and,
- protecting public health and safety from risk or damage associated with natural and human-made hazards;

The Growth Plan directs that the vast majority of growth will be directed to settlement areas that have a delineated built boundary, have existing or planned municipal water and wastewater systems, and can support the achievement of complete communities. In addition, the Plan provides direction for an urban form that will optimize infrastructure, particularly along transit and transportation corridors, to support the achievement of complete communities through a more compact built form. The urban built form shall include a diverse range and mix of land uses to accommodate the needs of the community, including affordable housing, institutional uses, and community facilities, with convenient access to a range of transportation and public open space options, including the safe, comfortable and convenient use of active transportation and publicly-accessible parks, trails, and other recreational facilities.

Comment/Opinion

The subject site is located within an urban, serviced settlement area and is considered part of the "built boundary" of the Town of Cobourg as established by the Growth Plan and the municipal Official Plan. Accordingly, the proposed development is considered *intensification* within the existing built-up area of the municipality as it involves the conversion and intensive re-use of an existing building.

In accordance with applicable Provincial and County policies, the Town of Cobourg is expected to grow by approx. 6,000 residents (to 26,105) and approx. 1,700 employees by 2034. Maintaining a commercial/institutional presence and adding professional service jobs as part of this development would count towards achieving the Town's and County's employment *intensification* targets as per the County Official Plan and Provincial Growth Plan.

A key component of the PPS 2020 is support for the Provincial goal to enhance the quality of life for all Ontarians, which includes accommodating a range of uses to meet long-term needs. In this regard, Section 1.1.1 b) of the PPS states the following:

"Healthy, livable and safe communities are sustained by: ... (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;"

As per the above section, the proposed uses could be considered as 'institutional uses', which are not limited in scope by the examples listed in the above policy.

Based on my review of the application for Zoning By-law Amendment, 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 intensification within the urban, serviced area of the municipality and makes effective use of existing infrastructure and buildings which will serve to reduce costs and the consumption of land and maintain and enhance service jobs. The proposed amendment will also introduce a land use which will assist in addressing the growing need for a specific health support service in the community and region by helping individuals battling addictions to chemical substances and alcohol and, thus, improve the overall health and safety of the public.

Therefore, I concur with the conclusions and opinions contained in the Weston Planning Report regarding conformity to matters 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 the provision of convenient access to an appropriate mix of jobs, local services, a full range of housing, and community infrastructure including affordable housing, schools, health, transit, recreation and open space for their residents. From this perspective, 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;
- Encourage a range of complementary and compatible land uses in residential areas, including community facilities, schools, small-scale commercial uses and recreational open space areas;
- 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; and,
- Encourage a high standard of urban design;

In addition to the above, the County Official Plan also encourages each of the six urban areas to become complete communities where there is:

- a) A strong live/work ratio, where the majority of residents are employed in the community in which they live;
- b) Choice in the market place, in terms of obtaining goods and services;
- c) A range of educational and training opportunities;
- d) A range of housing types for all levels of income and ages;
- e) A range of health care services for the majority of the residents;
- A range of community and social services to assist the majority of those in need in the community;
- g) A range of cultural and recreational opportunities and facilities; and,
- h) A population level and density that supports the provision of public transit, where feasible.

Comment/Opinion

In my opinion, the County Official Plan encourages the type of use proposed because it is one component of a range of community and social services to assist the majority of those in need in the community.

It is also my opinion that the proposed land use provides a desirable, adaptive change of commercial use to an institutional use which is appropriate for its locational context and is consistent with the Province's goal of intensifying growth and development within urban serviced settlement areas. The proposed re-use promotes the efficient use of existing infrastructure. In addition, the proposal integrates well with adjacent forms of development that exist in the general neighbourhood. The Subject Lands are located in a commercial area in close proximity to existing community services and transit facilities.

As referenced in Section 6.2 above, the proposed land use would assist in achieving the Town's and County's employment intensification targets as set out in the County Official Plan and Provincial Growth Plan.

Based on my review of the application and supporting documentation, I concur with the conclusions of the Weston Planning Report and it is my planning opinion that the application would conform 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.

Section 7.5 (pgs. 32-34) of the Weston Planning Report provides an overview and analysis of relevant OP Plan policies and provides opinion on conformity with municipal policies.

i. General

To a very large extent, the vision in the Cobourg OP recognizes Cobourg's role as a regional centre and economic hub in Northumberland County. Section 2.5 contains a principle and a number of objectives under the heading: 'Healthy and Economically Viable Community'. In this regard, the principle does broadly refer to 'social health' and a 'safe community' as per below:

"Principle: Decisions made with respect to the future of the Town of Cobourg will reflect the need to maintain a healthy and economically viable community.

The intent of this principle is to encourage a broadly based planning approach which will maintain and, where feasible, enhance the social and economic health of the Town and its residents. Components of this healthy community include economic vitality (e.g. provision of a wide range of employment opportunities, strong core area); lifestyle choices for residents (e.g. housing and service

opportunities for seniors, youth and young families); the availability of community services and facilities (e.g. access to recreation); a safe community; and general liveability."

To a large extent, rehabilitation/treatment centres and crisis care facilities support the above principle. One of the objectives under this principle supports safety and security as per below:

"vii) To ensure that all changes to the community promote safety and security through the use of appropriate design strategies".

Consistent with Provincial and County policies noted above, some of the key objectives of the Official Plan include the promotion of compact, walkable and mixed use neighbourhoods, the effective use of existing municipal piped infrastructure, transit and other services, high quality design, and integrating new development with existing neighbourhoods. More intensive development is encouraged along major transit and transportation corridors to promote alternative forms of transportation, including transit and active transportation modes. Compatibility and high-quality architectural design are also important principles of the Plan. In addition, the Official Plan recognizes the need to maintain and enhance the social and economic health and well-being of the community through appropriate land use mix and design strategies.

As referenced in Section 5.6 above, the Subject Lands are designated "Mixed Use Area" in the Official Plan (see <u>Figure 3</u> – Official Plan Designation below). The property forms part of the commercial node commonly referred to as Midtown. The Mixed Use Area designation permits a variety of commercial, office, institutional, light industrial, recreational and high density residential uses with a minimum FSI of 0.3. The aforementioned uses reflect the intent of the Plan to facilitate development on major transportation corridors which is compact, intensive, varied and of a larger scale than other land use designations.

The Official Plan does not specifically define an addiction rehabilitation treatment centre, but rather provides for institutional uses in a more generic capacity, such as hospitals, educational facilities, and supportive housing (large-scale group homes, long term care). Institutional land uses are found in a number of designations, including the Major Institutional Area, Mixed Use Area, Main Central Area and other commercial designations. Typically, the implementing Zoning By-law would more closely define specific institutional uses.

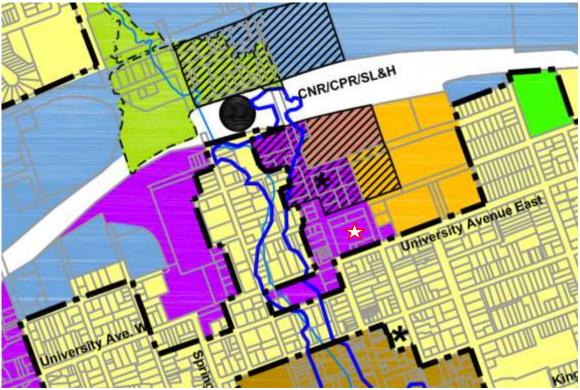


Figure 3 – Official Plan Designation

Comment/Opinion

The proposed development constitutes the conversion and re-use of the existing building, formerly used as an Inn/Hotel, for a privately-owned, fee-based treatment facility for persons suffering from addiction to drugs and/or alcohol (see <u>Figure 2</u> – Concept Development Plan above). The site is located within the Mixed Use Area designation which recognizes those commercial areas that are oriented to the service of vehicular traffic and require direct access from arterial roads and the exposure afforded by such a location. It is also designed to transition these traditional commercial 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.

In considering how to categorize the proposed use, it is my opinion that it is an institutional and while it is similar in some respects to a group home, it is different from a Group Home primarily because a Group Home is required to be licensed or approved for funding under Provincial Statute whereas the proposed addiction treatment centre is a private, commercial "for-profit" operation. In addition, those living in a Group Home are living under supervision in a single housekeeping unit, whereas the proposed addiction treatment centre is not proposed to be set up as a single housekeeping unit by virtue of the number of patients and staff. Lastly, Group Homes are permitted as-of-right in most land use designations (including Residential Areas), and typically involve permanent residential accommodations (ie. form the primary address or place of residence for its clients) and are integrated into residential neighbourhoods. Thus, a Group Home is considered a residential use.

The proposed rehabilitation treatment centre is designed as a closed (self-contained) facility, with limited to no interaction with the neighbourhood or community, and has limited-term accommodations (stays measured in weeks/months, and not primary place of residence). Thus, it is my opinion that a rehabilitation treatment centre is an institutional use.

ii. Cultural Heritage

Section 5.5 of the Official Plan outlines the general policies associated with cultural heritage preservation. A key principle includes the Town recognizing the significance of these resources and provide for their conservation, including adaptive re-use, in accordance with the provisions of the Planning and Heritage Act.

Comment/Opinion

The site at 420 Division Street is not designated under Part IV or V of the *Heritage Act* (Individual or District) but is on the Municipal Heritage Registry. This provides additional notification process in case a property is requested for demolition. The proposed development plan is for the re-use of the building with limited visible changes (signage and security/fencing).

Based on a review of the proposed draft plan and supporting documentation, it is my planning opinion that the proposal satisfies the heritage conservation policies of the Official Plan.

iii. Sustainability

The Cobourg Official Plan contains a number of references to sustainable community design, including the Vision, Section 2.7 – Community Design Principles, Section 4.0 Greenlands System and Section 5.0 Community Design & Improvement (to name a few), however the key initiative is found under Section 4.8 – Sustainability Strategy.

The purpose of the Strategy is to foster a "culture of conservation" which reflects the principle of sustainable development – "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". The policies contained within the Strategy, and the supporting guidelines in the Town's Urban & Landscape Design Guidelines, are aimed at encouraging development which is based on this principle and set the framework for the creation of an Integrated Community Sustainability Plan (ICSP).

In particular, the Town shall encourage development designed to:

- reduce the consumption of energy, land and other non-renewable resources including support for energy efficient building and opportunities for cogeneration;
- ii) minimize the waste of materials, water and other limited resources;
- iii) create livable, healthy and productive environments;
- iv) reduce greenhouse gases; and,
- v) enhance biodiversity, ecological function, and the natural heritage system, including the provision of wildlife habitat and linkages.

Comment/Opinion

The development plan envisioned by the zoning amendment is an adaptive re-use of an existing building served by existing municipal infrastructure and facilities. This project will be encouraged during the interior modification to follow the key directions of the Town's sustainability strategy such as water conserving plumbing fixture and taps, energy conserving LED light bulbs, etc.

In my planning opinion, the re-development plan envisioned by the zoning amendment responds to the principles of sustainable development in conformance to the policies of the Official Plan and Urban & Landscape Design Guidelines.

iv. Community Design & Improvement

The policies of Section 5.0 of the Official Plan provide direction for evaluating development from an urban design and improvement perspective, and are to be read in conjunction with the Urban and Landscape Design Guidelines. Key themes include streetscape design, building design, significant views, heritage conservation, landscape design, community design, community improvement, accessibility/visitability, commercial/mixed use development design, and active transportation.

Comment/Opinion

The proposal involves the adaptive re-use of an existing commercial Inn/Hotel building into a rehabilitation treatment facility. There will be little change to the existing streetscape or site design and the heritage attributes of the building will be conserved. The re-development will be subject to the Site Plan Approval (SPA) process where additional measures for potential site and building alterations, landscaping, and screening will be addressed. In response to security and public safety concerns, the operation is intended as a "closed facility" where little to no interaction with the balance of the community or neighbourhood will occur, and site security will be addressed via 24 hour supervision, controlled access and perimeter fencing. The provision of external facilities for enhancing accessibility and visitability will be examined during the detailed site design process for the re-development.

In my opinion, the proposal satisfies the community design and improvement policies of the Official Plan and Urban & Landscape Design Guidelines.

v. Transportation

The transportation strategy of the Official Plan is based on the principle of providing a safe, economic and efficient transportation system while offering a balance of transportation choices that reduces reliance on a single mode and promotes transit, cycling and walking and other active transportation modes. The policies also speak to integrating land use and transportation system planning to optimize support for alternative modes of travel.

A Traffic and Parking Brief was submitted in support of the proposed treatment centre. The Trans-Plan Traffic and Parking Brief concluded that there will be minimal impacts to the existing road system and intersections as a result of the proposed re-use of the former Inn/restaurant. The primary traffic affecting the site will be from vehicles dropping off patrons and for staff parking. The Brief also concludes that there is an adequate supply of parking on-site to serve the proposed use.

Comment/Opinion

The subject site is proposed to transform from a publicly-accessible Inn/Hotel serving the travelling public and a full-service restaurant to a private, fee-for-service rehabilitation treatment centre. The site is situated on a major arterial road in close proximity to municipal transit and regional rail service. Traffic and parking impacts should be minimal. In my opinion, the proposed re-development plan conforms to the transportation policies of the Official Plan.

vi. Municipal Servicing Infrastructure

All new development/re-development in the community shall be serviced by full municipal services. A Functional Servicing Brief was prepared by Crozier Consulting Engineers in support of the re-development plan which demonstrates that the proposal can be appropriately serviced with existing municipal infrastructure in accordance with relevant criteria of authorities having jurisdiction.

Comment/Opinion

The Crozier Servicing Brief and related engineering documentation confirms that the necessary infrastructure is in place to service the Subject Lands and that runoff can be contained on the site and accommodated to meet all relevant criteria of authorities having jurisdiction (GRCA, Town Engineering/Public Works, County). There will be an increase in maximum daily and peak hourly water usage with subsequent increases in sanitary design flows, however existing pipes and road connections are appropriately sized to accommodate this. It is my opinion that the servicing infrastructure policies of the Official Plan are satisfied.

From an analysis of the proposal relative to the policies of the Official Plan, planning staff concludes that the proposal satisfies the requirements of the Plan and that the general intent and objectives of the Plan are maintained. Thus, in my opinion, the proposed Zoning By-law Amendment conforms to the Official Plan.

6.5 Zoning By-law:

Section 7.6 (pg. 35) of the Weston Planning Report provides a summary of the zone provisions and a zoning analysis. The site is presently zoned "District Commercial exception Two (DC-2) Zone" which permits a range of service commercial and institutional uses, including office, personal service, clinics, wellness centres, vehicle-related uses, hotels/motels, places of entertainment, clubs and institutional uses. An addiction rehabilitation treatment centre is not defined as a specific use in the current Zoning By-law, however a business that caters to the general health and wellness of individuals (ie. clinics, counselling, therapy) and other personal service uses is permitted.

Weston Consulting has proposed that a new definition be added to the Zoning By-law, as follows:

"Residential Treatment Facility -- 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."

As indicated above, the current Zoning By-law definitions for Clinic, Medical Clinic, Institutional Use, Group Home, Private Hospital or Emergency Care Establishment do not capture the requested land use. Many of these definitions date from the 1987 Zoning By-law and have not been amended since. The subject application proposes to add a specific definition for a residential treatment facility (noted above) for this site.

The Zoning By-law is presently under a comprehensive review process with Meridian Planning Consultants (Meridian), including a specific review of rehabilitation treatment centres at the direction of Council. Municipal staff consulted with Meridian during the examination of the re-zoning application by CCFA.

Over the last several months, Meridian conducted a detailed background review and environmental scan of zoning provisions from a number of small to medium municipalities, including Whitby, Kingston, Burlington, Oshawa, Port Hope, Belleville and Brockville. Based on the municipal scan, it is evident that different municipalities address social service type land uses in their own way, although similar themes were noted. Interestingly, none of the scan results showed a specific definition for rehabilitation treatment centre. Most municipalities categorize social service support uses in their land use definitions using some of the following sample terms:

- i) <u>Crisis Care Shelter</u> short term emergency accommodation and support services as a result of crisis situation, but is not a municipal shelter
- ii) <u>Emergency Care Establishment</u> short term emergency accommodation for persons experiencing homelessness or crisis, with or without referral (may overlap with Item i above).
- iii) <u>Transitional Home/Shelter</u> provides specialized client programming and requires referral from an emergency shelter or from an agency, and typically longer term accommodation to help clients address their housing and service needs.
- iv) <u>Detoxification Centre</u> an institution that provides treatment to persons who are addicted to chemical substances and/or alcohol under strict and responsible 24 hour supervision, and must be licensed, funded or approved by the Province and registered with the municipality.
- v) Recovery Home provides short to long term continuum of care, rehabilitation, therapy and support for those discharged from detoxification centres under regular 24 hour supervision.

The results of the municipal scan have pointed to the City of Kingston as having a very comprehensive land use and regulatory framework for social service support and care facility uses. This was derived in part due to the significant number of large institutions that exist in that region. Based on our review and as noted in Section 6.4 i) above, it is my opinion that a rehabilitation treatment centre is an institutional use as opposed to a residential use given the primary activity involves medical treatment and counselling services for those suffering from addictions to drugs and/or alcohol, and involves temporary accommodation away from their primary residence.

A crisis or emergency care establishment would also be considered an institutional use as well, because they provide temporary shelter, protection and support to those who have a primary address elsewhere or are homeless and do not have a fixed address. In addition, the occupants of a crisis centre or emergency shelter

may reside on the premises for only short periods of time and may in some cases be accessed at any time of the day or night depending on the purpose of the facility. Notwithstanding the above, a small-scale crisis centre could be integrated within a residential area provided the number of occupants did not exceed what is permitted in a Group Home and provided the occupants were living as a single housekeeping unit, albeit on a more temporary basis.

From the best practices scan, there were no examples of zone provisions which specify minimum distance separations for such uses as the one proposed for the Subject Lands, crisis care centres or emergency care establishments to sensitive land uses (ie. schools, daycares, park/playgrounds) or to residential uses. Some municipalities have included provisions which separate similar and like uses from one another to avoid undue or over-concentrations of such uses so as to minimize impacts on the character of residential/non-residential neighbourhoods. These separation distance requirements, however, have been successfully challenged at the Human Rights Tribunal of Ontario on the basis that it discriminates against persons with disabilities.

The proposed CCFA rehabilitation treatment centre is located within a mixed-use/commercial designation and zone and on a major arterial corridor. St. Michael's elementary school is currently located approx. 75 m from the subject property. The Separate School Board approved its closure in 2018 by way of an accommodation review subject to Ministry capital funding approval for the re-location, however no specific timeline has been confirmed.

There has been no data, guidance or evidence found which identifies what a reasonable distance setback for such a use would be, nor demonstrates that a setback would provide an enhanced level of compatibility between uses. Much will depend on the unique nature of each of these types of uses (programming, operations, nature of clientele, fee based or not fee based, self-contained, drop-in) and the unique circumstances associated with each site. It may be reasonable to conclude that a rehabilitation treatment centre should not be situated *adjacent to* or *abutting* sensitive land uses such as schools, daycares and parks and playgrounds. It is my opinion, however, that a rehabilitation centre could be located on a lot that abuts residential uses.

The subject property is located in a designated mixed use and commercial land use category and is of sufficient size to offer reasonable setbacks and buffering opportunities from adjacent land uses, including the existing residential land uses to the north and south (which are also within the Mixed Use designation) and those to the east. The operation of this facility is completely self-contained and does not rely on community facilities and support systems of the community. In addition, there is no interaction of patrons of the facility with the surrounding neighbourhood. As such, the proposed use is not anticipated to create any significant negative impacts on surrounding residential, non-residential and sensitive land uses. Conversations with Port Hope Planning staff have indicated that there has been no evidence of adverse impacts on the neighbourhood or complaints as a result of CCFA's rehabilitation treatment facility in their community.

Thus, in collaboration with Meridian, the following definition has been prepared for the proposed rehabilitation treatment centre by CCFA at 420 Division Street:

"Rehabilitation/Detox Treatment Centre – a private, fee-based facility that primarily offers secure, supervised specialized care, treatment and/or

rehabilitation services on an in-patient basis for individuals who are addicted to chemical substances and/or alcohol. Services shall generally include 24-hour accommodation for a period equal to or greater than seven (7) consecutive days, where meals are served to patrons. The premises may also include accessory offices, lounges and meeting rooms. A Rehabilitation/Detox Treatment Centre shall not include a Group Home I or II, Emergency Care Establishment, Medical Clinic, Clinic, Wellness Centre, Boarding or Lodging House, or Hotel/Motel. For the purpose of this use, "secure" shall mean monitored and controlled ingress and egress to the facility at all times."

It should be noted that zoning by-laws in Ontario are only permitted to regulate the *use* of land, not the *user*. The Courts have decided that by-laws which are designed to control the user and require separation distances between certain types of uses based on the people who occupy the uses constituted "people zoning" and are therefore invalid. The *Planning Act* has been structured to be consistent with these Court decisions. The OMB (now LPAT) determined that municipalities must also consider the discriminatory implications that a municipal by-law or planning instrument has in relation to the Ontario Human Rights Code, and if the effect of the by-law is discriminatory and therefore subject to challenge before the Human Rights Tribunal of Ontario and/or contravene the Canadian Charter of Rights and Freedoms.

Notwithstanding the above, separation distances are reasonable in certain circumstances to help alleviate impacts of a particular use on an abutting or nearby use. There has been no data, guidance or planning rationale found which identifies what a reasonable distance setback for such a use would be – the separation distances would need to be assessed based on the specific facilities, activities and functions associated with the specific land use(s) and their impacts. Given that it is considered an institutional use, a rehabilitation/detox treatment facility should only be permitted in commercial and institutional zones and only after the consideration of site specific variables via a Zoning By-law Amendment.

In the case of the proposed rehabilitation/detox treatment centre at 420 Division Street, it will be completely self-contained, secured and supervised on a 24 hour basis and patrons of the facility will not interact with the surrounding neighbourhood. As such, the proposed use is not anticipated to create any significant negative impacts on surrounding residential, non-residential and sensitive land uses (daycare, park/playground/ school).

Accordingly, it is my opinion that the proposed operation is not anticipated to create any significant negative impacts on surrounding residential, non-residential and sensitive land uses, and that a minimum setback from sensitive uses is not required. It is however, recommended that such a facility should not be situated immediately adjacent to or abutting a sensitive land use. The latter scenario does not apply to 420 Division Street.

Therefore, in consultation with Meridian, the following specific regulations governing the proposed rehabilitation/detox treatment centre are proposed to be included in the zoning by-law amendment (in addition to the proposed definition):

- Centre Capacity: 40 beds/patrons maximum, exclusive of staff;
- Parking: 0.5 spaces/bed minimum.

Included in <u>Appendix VI</u> to this Report is a draft implementing Zoning By-law Amendment to Comprehensive Zoning By-law No. 85-2003.

6.6 <u>Department & Agency Comments</u>

The application for Zoning Amendment was circulated to municipal departments and external partner review agencies, including Engineering/Public Works, Police, Fire, Parks, Lakefront Utility Services Inc., the Ganaraska Region Conservation Authority (GRCA) and the County of Northumberland. No major concerns or comments were submitted with respect to the re-development plan and request for Zoning By-law Amendment. Comments from the Cobourg Police Service (CPS) are affixed to this Report as *Appendix V*.

Comment/Opinion

The Department and Agency comments submitted demonstrate that the proposed reuse of the former inn/hotel and restaurant for a Rehabilitation/Detox Treatment Centre is appropriate and should not impose any significant negative impacts on municipal infrastructure, transportation, and services, or on the surrounding neighbourhood or community based on CCFA's operational model. Additional review and comment on the detailed design of the proposed facility will occur during the Site Plan Approval (SPA) process and prior to the removal of the Holding (H) Symbol.

6.7 Public Submissions

A number of submissions were made to the Municipality by members of the public regarding the subject application prior to and during the Statutory Public Meeting held by Cobourg Municipal Council on November 30, 2020. The submissions primarily identified concerns over neighbourhood security and risk, comparisons to Transition House, COVID-19 issues, impacts on local emergency services, and laundry facilities. There were two (2) submissions in support of the proposed amendment.

A copy of the Public Meeting Notes is attached as <u>Appendix II</u>, together with Weston's Fulsome Comment Response and Comment Response Matrix, attached as <u>Appendix III</u> and <u>Appendix IV</u> respectively. The Weston responses provide itemized commentary and information regarding the public submissions, and it is not the intent of this Report to duplicate these responses, however the following provides a general overview of the key land use planning issues submitted and a brief commentary in response:

i) Community Safety & Risk

From a community safety, security and risk perspective, the information from CCFA specifies that patrons will be confined to the property for the entire duration of their stay, will not interact with the surrounding neighbourhood, and will not be able to leave the grounds once admitted (ie. no In/Out privileges). Staffing will be provided 24 hours/day to ensure the patrons receive structured treatment and counselling and are subject to appropriate levels of site supervision and security.

Comparisons have been made of the proposed facility to Transition House. It should be noted that the proposed rehabilitation/detox treatment centre by CCFA is <u>not</u> an emergency homeless shelter or similar transient housing operation, a drop-in centre or safe-injection site. This was clearly communicated during public consultation meetings held in November, 2020. It is a private, fee-based counselling/treatment centre for

those battling addictions to substances and alcohol, which is supervised 24 hours per day in a contained, well-structured environment. The patrons are there voluntarily, and not required to be there as part of any judicial, medical or agency referral program.

The proposed rehabilitation/detox treatment centre land use has been evaluated in a comprehensive manner within the context of Provincial, County and local policies and regulations and in accordance with the provisions of the *Planning Act*. This analysis included an assessment of the land use, its activities and functions, and its compatibility with and impact on adjacent land uses from a public health, safety and risk perspective.

In light of the specific activities and functions of the rehabilitation/detox treatment centre proposed by CCFA, it is my opinion that there will be minimal impact with no interaction of the patrons with the surrounding neighbourhood and impacts and risk to public safety should be minimal. A similar private facility has been located in a heritage structure in Port Hope since 2014. No planning issues or concerns relating to public safety, security or other impacts on the neighbourhood have been identified by Port Hope's municipal planning staff. The proposed use will in fact serve a benefit to the health and well-being of the public within the community and surrounding region. Thus, it is my opinion that a formal "risk assessment" is not warranted or required.

ii) Security Measures and Fencing

From a site security and fencing perspective, the applicant indicates 6-foot wood perimeter fencing will be installed, with decorative metal fencing in the front yard area. Fencing already exists on the north and south property lines and along the rear open space. Any changes to the site will be reviewed with municipal staff once those details are known during the Site Plan Approval (SPA) stage of the process.

iii) Impacts on Local Emergency Services

In response to comments from the public about the potential drain or impact on local emergency services, the applicant has indicated that only a few visits per year are expected from emergency services based on experiences with the Port Hope facility. The Cobourg Police Service has commented that, based on the operational model proposed by CCFA, the re-zoning should have minimal impact on adjacent land uses and neighbourhoods from a policing perspective.

iv) COVID-19 Issues

A number of questions arose regarding the operation's response to COVID-19 health and safety protocols. While not a land use planning ground on which to base a planning decision, the proponent responded with details associated with the operation's COVID-19 procedures, including active screening, testing, social distancing, PPE, and personal/environmental hygiene. Refer to *Appendix III*.

v) Laundry Services/Facilities

The applicant has confirmed a preference to use existing laundry machines and setup for on-site laundry facilities.

7. FINANCIAL IMPLICATIONS/BUDGET IMPACTS

There are no anticipated negative financial implications imposed on the Municipality as a result of this application. The developer will be responsible for all costs associated with converting the building for the proposed use. The applicant submitted the requisite \$7,000.00 in application fees and deposit.

8. CONCLUSION

Based on an evaluation of the application relative to the applicable Provincial and Municipal policy and regulatory framework, it is my planning opinion that the proposed Zoning By-law Amendment is appropriate, desirable and represents good planning for the following reasons:

- i) 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 that it constitutes an adaptive re-use of an existing heritage building within the existing urban, serviced area of the municipality, and introduces a land use which will assist in providing a specific health support service in the community/region for persons struggling with addictions to chemical substances and alcohol and, thus, helps improve the overall health, safety and well-being of the public.
- ii) The proposal will enhance the social and economic health of the Town and its residents by providing opportunities to residents and others to improve their lives by overcoming addictions to drugs and/or alcohol, which in the overall public interest;
- iii) The proposed institutional use is not anticipated to impose any significant impacts on the surrounding neighbourhood or community in general as the use will be largely contained within the existing building (no interaction of patrons with the general community), is staffed and supervised 24 hours/day and offers services in a well-structured, secure environment with minimal external alterations to the building or property;
- iv) The proposed institutional use is located within an existing mixed use/commercial node on a major arterial and is compatible with adjacent land uses;
- v) The proposed Zoning By-law Amendment in Appendix VI contains special provisions governing the land use definition, facility capacity and parking, and represents good planning.

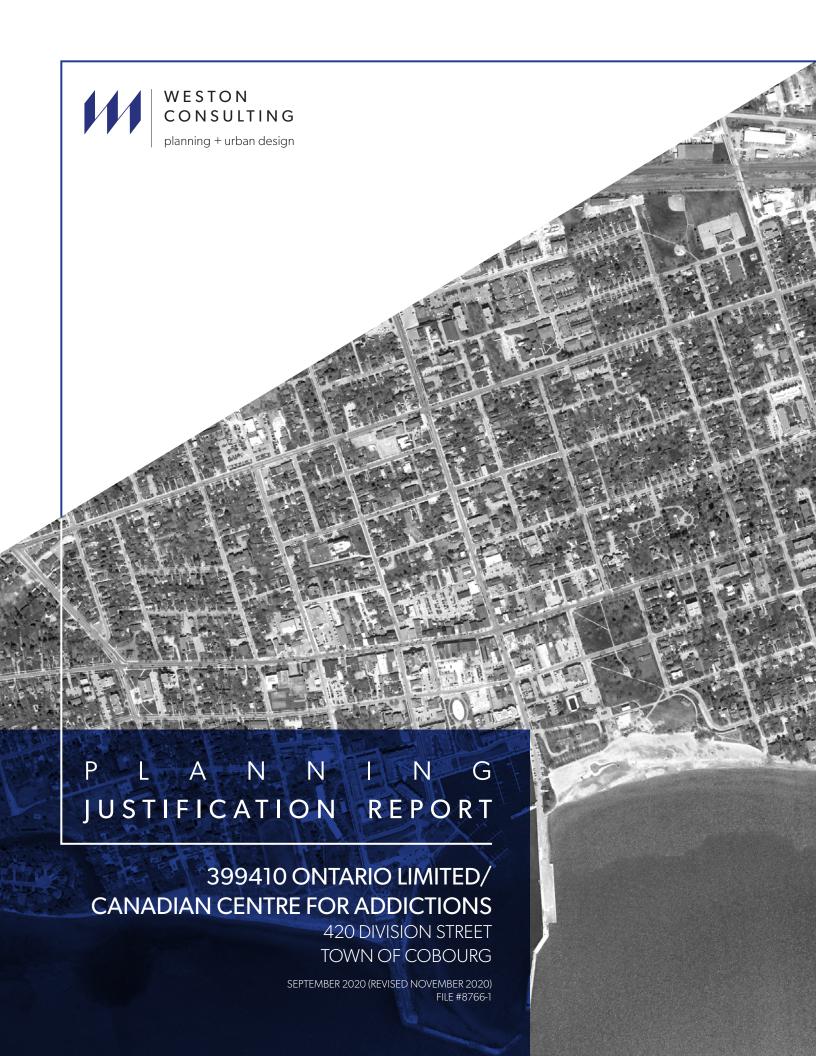


TABLE OF CONTENTS

1.INTRODUCTION	. 4
1.1 Purpose of The Report	. 5
2. SITE DESCRIPTION AND CONTEXT	. 6
2.1 Legal Description	. 7 . 8 . 9
4. PUBLIC CONSULTATION	
5. DESCRIPTION OF THE PLANNING APPLICATION	14
6. SUPPORTING MATERIALS	18
7. PLANNING POLICY CONTEXT	20
7.1 Planning Act	23 28 30 32
8. DRAFT ZONING BY-LAW AMENDMENT	36
9. PLANNING ANALYSIS AND JUSTIFICATION	38
9.1 Planning Policy Context	40 41
10 CONCLUSION	12

L	IS		O	H	ŀ	-	G	U	R	E	S
Figure	1: Aerial Pl	notograph o	f the Subject Property .		 		 				9
Figure	2: Site Co	ntext Aerial F	Photograph		 		 				11
Figure	3: County	Official Plan	Schedule A – Land Use		 		 				33
Figure	4: Official	Plan Schedu	le A – Land Use		 		 				34
Figure	5: Official	Plan Schedu	le E – Road Network Pla	an	 		 				35
Figure	6: Official	Plan Schedu	le A – Land Use		 		 				36
		_		_				_			
	IS	T) F			Α	B		\vdash	S
		•					<i>,</i> ,				
Table 1	1: DC-2 Zo	ning Provisic	ons		 		 				35



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 additions.

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.



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 a 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.

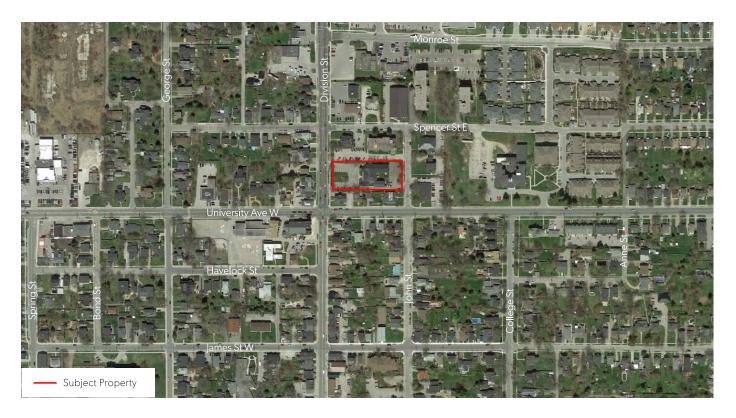


Figure 2: Site Context Aerial Photograph



3.PROPOSEDDEVELOPMENT

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.



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.



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.



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 BRIFF

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 BRIFF

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.



7.PLANNINGPOLICYCONTEXT

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.

7.1 PLANNING ACT

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;
- (I) the protection of the financial and economic wellbeing 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;
- 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
 - 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 welldesigned 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
- *I)* 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 GOLDER 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 thorseshoe.

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 reuse 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.

<u>Section A – Vision, Guiding Principles and Land Use</u> 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:

- 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

7.5TOWNOFCOBOURGOFFICIALPLAN(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.

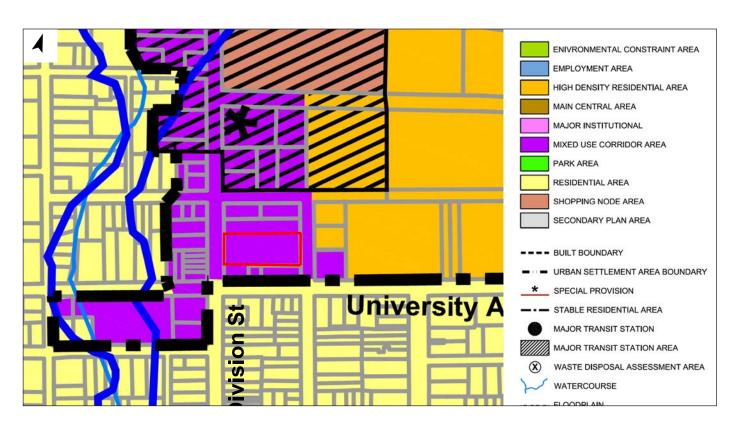


Figure 4: Official Plan Schedule A – Land Use



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 feebased 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 Edesignates 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.

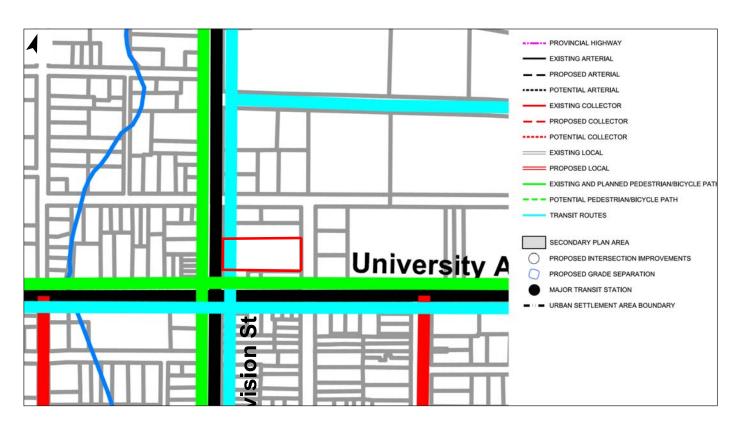


Figure 5: Official Plan Schedule E - Road Network Plan

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.

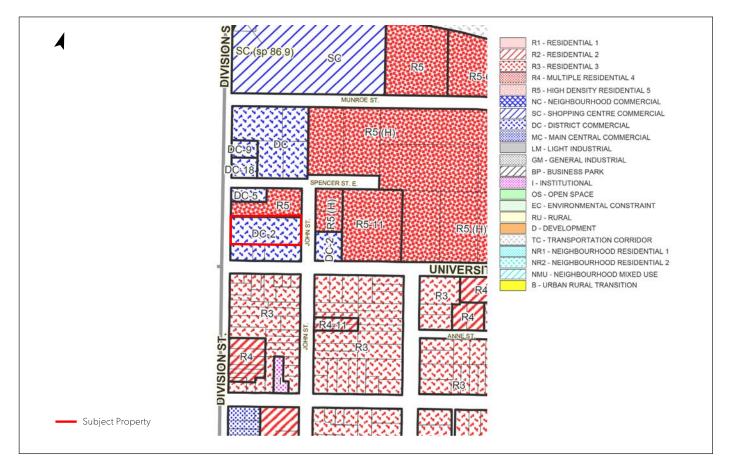


Figure 6: Official Plan Schedule A – Land Use

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-2Zoning Provisions



8. DRAFTZONING 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.



9. PLANNING ANALYSIS AND JUSTIFICATION

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 though 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 matter that protects human health and the natural environment.



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.





The Corporation of The Town of Cobourg Public Planning Meeting MINUTES

November 30, 2020, 5:00 p.m. Electronic Participation

Members Present: Mayor John Henderson

Deputy Mayor Suzanne Séguin

Councillor Nicole Beatty Councillor Aaron Burchat Councillor Adam Bureau Councillor Emily Chorley Councillor Brian Darling

Staff Present: Tracey Vaughan, Chief Administrative Officer

Glenn McGlashon, Director of Planning and Development

Brent Larmer, Municipal Clerk/Manager of Legislative Services

Krystal Christopher, Deputy Clerk

1. CALL TO ORDER

Chair, Councillor Beatty, Coordinator of Planning and Development Services, called the Meeting to Order at 5:04 P.M.

2. <u>INTRODUCTION</u>

3. DECLARATION OF PECUINARY INTREST

Councillor Brian Darling declared a conflict on this item. (I am a co-owner of a property within the 120 metre notification zone. The re-zoning of the property at 420 Division Street may have an impact on our property.)

Councillor Emily Chorley declared a conflict on this item. (Having received written notification indicating that my property lies within 120m of the subject property, and having consulted with the Town of Cobourg Integrity Commissioner, I am

declaring a potential pecuniary interest on the zoning amendment application for 420 Division Street because my property falls within the notice circulation area and may be impacted by the land use planning application. I am making this declaration under Section 5 of the Municipal Conflict of Interest Act, and I will not be participating in the discussion or any future vote on this matter.)

Councillor Aaron Burchat declared a conflict on this item. (My place of employment has done work for the Canadian Centre for Addictions. So I'm calling an indirect conflict.)

4. NOTIFICATION PROCEDURE

5. ZONING BY-LAW AMENDMENT 420 DIVISION STREET, COBOURG

5.1 Ryan Guetter, Weston Consulting, to provide background and an explanation of the application for Zoning By-Law Amendment at 420 Division Street, Cobourg

R. Guetter provided an overview of the application for Zoning By-law Amendment at 420 Division Street and spoke to the proposed use of the subject property and the repurposing of the existing building. The presentation highlighted the Provincial Policy Statement within the context of Northumberland County, the Town's Official Plan and the public open house held on November 18, 2020. R. Guetter provided an explanation of the operation of residential treatment facilities and the next steps.

Members of Council raised questions regarding the proposed application, to which Mr. Guetter responded.

5.2 Memo from the Manager of Planning, Notice of Complete Application for Zoning By-law Amendment 420 Division Street, Cobourg (Weston Consulting, Canadian Centre for Addictions)

Glenn McGlashon, Director of Planning and Development, briefly spoke to the Application for Zoning By-Law Amendment 420 Division Street and provided details on the status of the application.

G. McGlashon noted that additional background information associated with the application may be found by accessing the following Planning & Development webpage link: https://www.cobourg.ca/en/business-and-development/Planning-Applications.aspx

6. PUBLIC SUBMISSIONS

Chair, Councillor Beatty, Coordinator of Planning and Development Services, explained the order of public submissions and requested all persons addressing the public meeting to state their name and address for the official record of the public meeting

The Town of Cobourg received the following Public Submissions:

Jim Strouse, Cobourg Resident Submission (Pebble Beach Drive, Cobourg)

J. Strouse provided comments regarding the number of patients from the Northumberland County and Cobourg area and how services of the new facility will differ from existing services in Port Hope.

<u>Therese May, Cobourg Resident Submission (University Avenue East, Cobourg)</u>

T. May provided comments regarding the importance of a risk assessment and a patients ability to leave the treatment facility.

<u>Marcia McLeod, Cobourg Resident Submission (University Avenue East, Cobourg)</u>

M. McLeod provided comments regarding the added value the facility would bring to Cobourg and raised concerns regarding the location of the facility.

Denis Gagne, Cobourg Resident Submission (Division Street, Cobourg)

D. Gagne provided comments regarding the fencing of the proposed facility and when the facility is anticipated to start accepting patients.

Jennifer O'Rourke, Cobourg Resident Submission (Lakeshore Road, Cobourg)

J. O'Rourke provided comments regarding the property taxes and whether the facility would be subject to property taxes.

WRITTEN COMMENTS/SUBMISSIONS RECEIVED BY THE MUNICIPAL CLERK AS OF PRINTING OF AGENDA

Brent Larmer, Municipal Clerk noted three (3) written submissions were received from residents and is attached to the agenda.

- Rick Lovekin (Item 6.2)
- David Wright (Item 6.3)
- Ian McKlevey (Item 6.4)

WRITTEN SUBMISSIONS RECIEVED FROM COMMENTING AGENCIES

Glenn McGlashon, Director of Planning and Development Services, advised that no formal comments or objections were received for the application. Mr. McGlashon noted he is awaiting feedback from Cobourg Police Services.

APPLICANTS RESPONSE

- R. Guetter noted that a written response to public comments will be provided in a few weeks.
- 6.1 Written Submission from Dilys Robertson, Cobourg Resident
- 6.2 Written Submission from Rick Lovekin, Cobourg Resident
- 6.3 Written Submission from David Wright, Cobourg Resident
- 6.4 Written Submission from Ian McKlevey, Cobourg Resident

7. FURTHER NOTICE

Chair, Councillor Beatty, Coordinator of Planning and Development Services, advised that persons requiring notice of passage of the proposed approval of the Zoning By-law Amendment are to advise the Municipal Clerk of their name and address to ensure receipt of notice.

8. ADJOURNMENT

Moved by Councillor Adam Bureau

THAT the meeting be adjourned (6:32 P.M.)

Carried



WESTON CONSULTING

planning + urban design

Building and Planning Department Town of Cobourg Victoria Hall 55 King Street West Cobourg, Ontario K9A 2M2 December 22, 2020 File 8766-1

Attn: Glenn McGlashon, Director - Planning & Development Division

Dear Sir,

RE: 420 Division Street, Town of Cobourg

Fulsome Response to Comments - Z-04-20

Weston Consulting is the planning consultant for the registered owner of the property municipally known as 420 Division Street in the Town of Cobourg (herein referred to as the "subject property"). We have been retained to provide planning assistance and coordinate the submission of a Zoning By-law Amendment application in support of the proposed use of a Residential Treatment Facility.

The owner of the subject property intends to convert the existing Woodlawn Country Inn and Restaurant to facilitate a privately owned, Residential Treatment Facility. The facility would provide lodging, meals and therapy for those recovering from alcohol and drug addictions. The existing 18 rooms will house approximately 40 patients (two to three patients per room) and administrative offices to assist women and men who are addicted to alcohol and other drugs learn the skills required to successfully live an alcohol and drug free lifestyle.

We herewith provide you with a cover letter rationale and comment response matrix, provided under separate cover, which addresses comments from Town Staff, the public and Town Council received to date. We ask that this package be made available to the public and distributed to all members of Council.

Ownership

The current owner of the subject property is 2759655 Ontario Limited. Weston Consulting is the authorized agent of the above-noted numbered company. Weston Consulting has submitted the applications on behalf of the applicant, who is known as the Canadian Centre for Addictions (CCFA). The CCFA will be the acting manager of the Residential Treatment Facility. The Director of 2759655 Ontario Limited is Ade Taitlbaum, who is an employee of the CCFA.

Application Process To-Date

Weston Consulting attended a Pre-Consultation Meeting held with Town of Cobourg municipal staff on February 10, 2020 and received a pre-consultation checklist of requirements to be submitted. An initial submission was made in support of the Zoning By-law Amendment application on September 9, 2020. The Notice of Complete Application was provided by Town Staff on September 24, 2020 and the application was tabled at the October 5, 2020 Committee of the Whole Meeting. Comments regarding the first submission were issued to Weston on November 5, 2020 and a response to these comments is noted in Section 1 in the comment response matrix, which has been provided under separate cover.

At the October 5, 2020 Committee of the Whole Meeting, a recommendation from Council was put forth for the applicant to lead a Public Open House meeting to provide an opportunity for the public to engage in receiving further information about the project. The Public Open House meeting took place on November 18, 2020 and was attended by several residents, Town Staff and certain elected officials. Questions were received and responded to during the Open House and a written response to key themes are included in Section 3 of the comment response matrix.

The application was then considered at the November 30, 2020 Public Meeting, where members of the public were able to engage in receiving further information about the project. At the Public Meeting, questions were received and responded to, and certain commitments were made to respond to questions that required more information. These questions have been responded to below in this document and Section 3 of the appended comment response matrix.

Responses below have been assembled together with input from CCFA Staff.

Application Next Steps

Further to the above-noted November 30, 2020 Public Meeting, the next steps in the application process was to undertake a re-submission to address the first submission comments. This document noted attachments represent a response to comments received to date and we request it be circulated to all relevant departments and external agencies at the earliest available opportunity.

Rehabilitation Facility Functions

The CCFA specialize in helping those who suffer from addictions to learn the skills required to successfully live an addiction free lifestyle. The CCFA provides a client-centred approach, where together with the client, the clinical team of addiction counsellors and therapists work to create a recovery program that best suits the individual's unique needs. The facility is not publicly funded and requires a fee prior to admittance. The CCFA has earned the seal of approval from Accreditations Canada, which is one of the largest and most respected organizations in health and patient care. Accreditations Canada proudly endorse the CCFA and the CCFA carry their certification as a promise of quality care to patrons. As a premier and professional rehabilitation facility, the CCFA is recognized as a top business in the field of addiction recovery by the Better

Business Bureau. The CCFA offers 24/7 supervision of all patrons admitted, a Red Seal Chefprepared menu, luxury amenities and the following programs:

- Detox and Withdrawal Management Services
- Mental Health Support
- One-on-One Counselling
- Family Program and Counselling
- Lifetime Aftercare
- Relapse Prevention Program Guarantee
- Evidence-Based Statistical Reporting

The facility anticipates a total of 12 staff members during daytime hours and 6 during overnight hours. The facility is not a safe injection site and will not bring additional drug-related activity into the community. The facility will not disrupt the surrounding residents, as patrons will be required to remain on the grounds during the entire duration of stay and any outdoor programs will be passive in nature.

Rehabilitation Facility COVID-19 Protocols

Due to the ongoing COVID-19 situation, the CCFA will maintain strict protocols to ensure that patrons, Staff and essential visitors are safe. The CCFA has been working in lockstep with and in direct consultation with Haliburton, Kawartha, Pine Ridge District Public Health (HKPR) since the beginning of the COVID-19 pandemic. As a requirement, all incoming patrons will need to provide a negative COVID-19 test prior to admission.

The CCFA policies and protocols exceed the Ministry of Health Guidelines with regards to all necessary infection and prevention control measures. The CCFA focuses on the following five key structures of infection prevention and control:

- Screening and Testing;
- Personal Protective Equipment;
- Social Distancing;
- Environmental Hygiene; and,
- Personal Hygiene.

Screening and Testing

All patrons must present a negative COVID-19 test prior to admission and all staff are tested onsite at regular intervals. Active COVID-19 screening occurs multiple times a day for all Staff, patrons and all essential visitors (i.e. supporting tradespersons). With respect to patrons, active screening will begin at pre-admission (a total of four times prior to admission) and patrons are continuously screened three times on a daily basis, and this includes patron's temperatures being taken at each active screening. With respect to Staff, active screening will be administered at the beginning of each and every shift and Staff member's temperature will be taken daily.

Social Distancing

The proposed floor plan copy attached, will be designed so that patrons' beds will be placed at a minimum of six feet apart within shared bedrooms and social distancing will be maintained by both Staff and patrons, at a distance of six feet apart at all times. Group settings, work areas, and dining will be modified by organization of furniture, demarcation or with staggered times, to promote social distancing throughout the facility. During an intake, the facility will only permit one family member to accompany patrons and social distancing between admission Staff will be maintained. In addition, screening protocols will be followed prior to admittance. Modifications of some activities may include outdoor spaces where social distancing and ventilation is more abundant and readily available. If activities can be moved outdoors, they will take place within the ground's outdoor amenity areas. Psychotherapy will be done utilizing remote video technology and online video options and in-house meetings (with social distancing) will replace off-site meetings.

Personal Protective Equipment

Personal protective equipment (PPE) has been stockpiled and is available to Staff and patrons. It is important to note that PPE is not a replacement for, but an addition to, social distancing protocols on site. Face coverings are mandatory for all Staff, and residents are encouraged to bring a Health Canada approved face covering that they may already be comfortable using. Surgical procedure masks are also available to all Staff and patrons. Face shields, gowns and gloves are available for both Staff and patrons for an added level of safety. Plexiglass barriers will be installed in strategic locations throughout the facility including administration areas, screening stations, medication administration areas and dining areas.

Environmental Hygiene

The CCFA has stockpiled Health Canada approved santizer and will perform enhanced cleaning and sanitizing at high frequency intervals. High-touch areas are of the subject of heightened focus and higher frequency of enhanced cleaning and sanitization. High-touch areas include:

- Toilets and sinks;
- Door handles (including refrigerator);
- Kitchen surfaces and small appliances (e.g., kettles, coffee makers);
- Light switches;
- Telephones and remote controls.

The CCFA completed a requested Infection and Prevention and Control (IPAC) guidance audit with HKPR Public Health. This was a requested service by the CCFA in an effort and commitment to go above and beyond the standard recommendations for infection prevention and control.

Personal Hygiene (Including Respiratory Etiquette)

The CCFA requires all Staff and patrons to perform proper hand hygiene with soap and water and Alcohol-based hand-rubs. Hand wash stations will be set up throughout the facility with appropriate signage posted throughout. Proper hand hygiene is required:

Before and after preparing food;

- Before and after eating;
- When entering or leaving a room;
- Before going to sleep;
- After using the restroom;
- After disposing of waste or handling dirty laundry;
- After someone blows their nose, coughs, or sneezes;
- After interacting with other people at a distance of less than two metres or six feet; and,
- After facilitating or engaging in group activities.

With respect to respiratory etiquette, the CCFA requires that all Staff and patrons cover their nose and mouth with a tissue when coughing and sneezing. If a tissue is not available Staff and patrons will be required to cough or sneeze into the bend of the arm, not the hand. Staff and patrons are to dispose of any tissues that they used as soon as possible into lined, non-touch waste basket (which are available throughout the facility) and to wash their hands upon the disposal of any tissues.

Conclusion

As mentioned above, a comments response matrix has been provided in addition to this cover letter. The comment response matrix contains responses to comments received to date including comments from Town Staff on the initial submission and comments received from the public and Town Council at the previous Public Open House and statutory Public Meeting.

We thank you for the opportunity to provide this response and trust that this material will be circulated to all relevant departments and external agencies at the earliest available opportunity.

Should you have any questions or require any additional information, please contact the undersigned at extension 241 or Paul Tobia at extension 290.

Yours truly.

Weston Consulting

Per:

Ryan Guetter BES, MCIP, RPP

Senior Vice President

c. 2759655 Ohtanio Limited

Canadian Centre for Addictions



Section 1. Town of Cobourg: Planning Department – Glenn McGlashon: gmcglashon@cobourg.ca				
November 5, 2020 Comments	Response			
1. While the PJR provides a good summary of the proposal relative to existing land use planning policies and regulations, information surrounding the use itself and its operations model is very general and vague. In our opinion, the proposal would be better served if the PJR (or a supplemental summary from the proponent/operator) provided a more detailed overview of the facility and its operations, as well as research into examples and best practices of other similar rehabilitation treatment centres in small urban settings Ontario (ie. safety & security of both clients and surrounding neighbourhood, integration of facility into neighbourhood/community, issues, lessons learned, myths, good news stories, etc.). There is a lot of mis-information out in the public realm and it would be prudent, if not critical, to provide more supporting background information on the proposed centre in order to dispel myths and concerns and enable an informed decision by Council.	Please refer to the cover letter and responses within Section 3 of this document, together with a link to the CCFA website and Open House and Public Meeting presentation.			
2. The subject property is listed on the Heritage Register of Properties (undesignated) pursuant to the Heritage Act. Demolition of any buildings and structures is prohibited. It is recommended that the property maintenance person have good working knowledge of heritage conservation best practices.	Noted. The applicant does not intend to demolish or make any exterior alterations and they are aware and have experience with heritage buildings, including the Port Hope location.			
3. Page 7 of the PJR specifies a site area of 0.28 ha – our GIS data shows 0.65 ha. This should be confirmed.	Geowarehouse and spatial data has confirmed the site area to be 0.38 ha – 0.94 acres			



Section	Section 2. Town of Cobourg: Engineering Department – Neil Stewart: nstewart@cobourg.ca				
Nover	nber 5, 2020 Comments	Response			
1.	The staffing levels in Table 1 of the Sanitary and Servicing Brief do not appear to match those listed in paragraph 3.2 Proposed Conditions.	Said levels are different due to the tables indicating different scenarios - the existing scenario versus the proposed scenario. Table 1 is called "Estimated Existing Population" in Section 3.1 and outlines the existing conditions while Section 3.2 outlines the proposed conditions.			
2.	The applicant shall confirm that the proposed sanitary manhole at the property line fronting Division Street has been installed.	Investigations are underway to confirm these details.			
3.	There is no mention of on-site laundry facilities. Please confirm if one is being provided.	The CCFA has a preference to utilize existing machines and setup for on-site laundry facilities.			

Section 3. Comments from the Public Meeting	
Is this facility a good fit for Cobourg?	The CCFA has completed several studies in conjunction with Dr. Siegel (the registered psychologist for the CCFA) who has come to understand after two years of gathering data, that the optimal treatment experience includes and is not limited to location, landscape, interior, staff, medical has in fact helped 93% of clients who attend the CCFA. The CCFA believes that the Town of Cobourg can offer a high-quality experience for treatment based on criterion that Cobourg exhibits.
There are a number of private services that are unregulated, resulting in low standards and outcomes.	Regulatory standards are followed as the facility will be accountable to many medical boards and labour guidelines. Consistent check-ins and follow ups from Town services are conducted to verify that standards are being met. The CCFA has been proactive in acquiring and maintaining good standing with Accreditation Canada (see cover letter for details).
Is the facility "out of reach" for those most in need of treatment due to the fee?	In addition to the fee for service, the CCFA provides affordable Outpatient Counselling Services as well as engaging in community events to help connect those struggling with addiction to the resources that could best influence positive behaviour change program.
Requested further information about the Accreditation Canada Award received by CCFA for the Port Hope location.	The CCFA has received Commendation Accreditation from Accreditation Canada. The CCFA has exceeded the rigorous and robust healthcare standards required by Accreditation Canada's Qmentum program. Qmentum is a globally developed locally tailored accreditation program



Concerns were expressed regarding COVID-19 given regarding the number of beds per room and the layout of the beds. Beds are close together and patrons will be coming to the facility from different households. It has been reported that two patrons have tested positive at the Port Hope facility. Will COVID tests be required prior to the patron admitted to the facility?	supported by staff who have extensive lived experience in health care. Accreditation Canada is the same body that provides accreditation to prominent healthcare agencies such as hospitals, laboratories, clinics and long-term care facilities. Accreditation Canada's programs assess organizations against standards developed by their affiliate which is the Health Standards Organization (HSO). The HSO standards focus on providing the highest achievable quality for patients and their families covering a broad spectrum of health services. The standards are designed in partnership with clinicians, policy makers, patients and families to ensure they provide for effective health services and overall value. All patrons must present a negative Covid-19 Test prior to admission. All staff are tested on-site at regular intervals. Active COVID-19 screening occurs multiple times daily for all Staff, patrons and all essential visitors (eg. supporting tradespersons etc.). Active screening for patrons will begin at pre-admission (four times prior to admission) and are continuously screened three times on a daily basis. Resident's temperatures are taken at each active screening. Active screening for Staff will be administered at the beginning of each and every shift and Staff's temperature will be taken daily.
Concern was expressed regarding the current drug and alcohol situation within Cobourg and Northumberland. It is noted that there are non-fee facilities that can assist those who cannot afford the fees of CCFA. Services provided by the proposed facility could be a greater help to the greater surrounding community, rather than a select few. Is there an ability for the proposed facility to assist the greater community, including those who cannot afford the fee?	The CCFA is aware of the current drug and alcohol situation within Cobourg and Northumberland and believe that this location will help contribute to remedy the current situation. The CCFA is continually coming up with options and services for those who financially cannot obtain our direct service. The CCFA are very involved in the community by helping and funding outreach, detox and counselling programs. The CCFA has also partnered with soup kitchen organizations so others may have the opportunity including the Oshawa Mission and Salvation Army. The CCFA take time with anyone contacting us about help and make sure those who reach out get the right information and best fit recommendations if the CCFA cannot directly contribute. The CCFA has been involved with public agencies regarding addiction and or mental health services.
Who will the patrons of the facility consist of?	The facility is not regional/town-specific and patrons of the facility will be accepted from all over Ontario.
How will the facility meet social distancing protocols and will there be an overseeing body that regulates this?	Social distancing is to be maintained by both Staff and patrons who will maintain a distance of six feet distance apart at all times. Group settings, work areas, and dining will be modified by organization of furniture,



Updated: December 22, 2020

	demarcation or with staggered times to promote social distancing throughout the facility. Beds will also be placed at a minimum of six feet. Patron intakes will permit only one family member to accompany the resident and social distancing between Admission Staff must be maintained. Screening protocols must also be followed prior. Modifications of some activities may include outdoor spaces where social distancing and ventilation is more abundant, however, if activities can be done outside, they will be. Psychotherapy will be done utilizing remote video technology and online video options and in-house meetings will replace off-site meetings.
How many patrons will be from the Cobourg area?	This is to be determined when patrons admit themselves. Patrons are welcome from all over Ontario, including the Cobourg and Northumberland areas.
How will this facility differ from that of Port Hope?	This facility will be similar to that of Port Hope. The Port Hope location received the Accreditation Canada Award from an overseeing body for hospitals and nursing homes. The board ensures that the best care and highest standards are met by the facility, auditing Staff, programing, effectiveness, leadership, safety and ethical practice.
When will further information about the facility be made available to the public?	Further information is available any time by telephone at or the following website: https://canadiancentreforaddictions.org/
Will the patrons have the ability to leave the facility or are they confined to the property?	The patrons will be confined to the property during the entire duration of stay. They will have the ability to leave the indoor portion of the facility and have access to the grounds for fresh air and outdoor amenities and programs but are not allowed to leave the grounds once admitted. The perimeter of the facility will also be fitted with a six-foot high wood fence.
What is the value the facility will contribute to Cobourg?	The facility will preserve the historic Woodlawn Inn building exterior with minor alterations to the interior. The facility will also provide for an additional employment use in the community. The facility provides a client centred approach, where together with the client, the clinical team of addiction counsellors and therapists work to create a recovery program that best suits the individual's unique needs. The facility is not a safe injection site and will not bring drugs to the community. Furthermore, it will not disrupt the surrounding patrons and will not cause the community to become unsafe.
Does the CCFA have any affiliation with a government agency and are inspections required?	The CCFA has earned the seal of approval from Accreditations Canada which is one of the largest and most respected organizations in health and patient care. Accreditations Canada proudly endorse the CCFA and the



	CCFA carry their certification as a promise of quality care to patrons. As a premier and professional rehabilitation facility, the CCFA is recognized as a top business in the field by the Better Business Bureau.	
What is the anticipated commencement date of the facility once the Zoning is approved?	The anticipated commencement date would be once the facility has received all regulatory approvals and is renovated to accept patrons, but would be anticipated in 2021.	
Do patrons have the opportunity to obtain government funding to assist in paying the required fees of the facility?	The CCFA is a private rehabilitation facility that provides superior client-centered addiction treatment, and is not subsidized by government funding.	
Is there a risk assessment required to be completed?	No, we do not feel a risk assessment is necessary.	
What is the frequency that police/fire/emergency are called to this use?	Drawing on the existing facility in Port Hope, the CCFA anticipates that emergency response services will be called to the site approximately one to three times a year, and the facility is not anticipated to be impacting local emergency response.	
What is the CCFA structure/management?	The CCFA structure is composed of the Owner (Ade Taitlbaum), with Head Office Management Staff (Justin Lebofsky and Seth Fletcher), On-Site Manager/Director (Christine Doughty) and Therapist (Dr. Jonathan Siegal). In addition, subsequent staff includes a Weeknight/Weekend Manager (Jeff Cameron), Head of Administrator (Maria Di Girolamo) and a Director of Family Services (Beverly Lucas).	



Cobourg Police Service

Paul VandeGraaf Chief of Police 107 King Street West Cobourg, Ontario K9A 2M4

(905) 372-6821 Administration (905) 372-8325 Fax

January 25, 2021

Glenn J. McGlashon, MCIP, RPP
Director – Planning & Development Division
The Corporation of the Town of Cobourg
55 King Street West, Victoria Hall
Cobourg, ON K9A 2M2

To Whom it May Concern,

I am responding to calls for input about the proposed rehabilitation treatment centre commonly known as The Canadian Centre for Addictions to be located at 420 Division Street.

Obviously predicting future issues that may or may not arise from the creation of such an establishment is not a perfect science. I am left to refer to a like situation in another community. Fortunately, we do not have to look too far as there is the same type of facility in Port Hope. In conversation with the Port Hope Police Service, the operation of such a facility has had little to no impact on those policing responsibilities specific to the proposed usage. Furthermore, we were advised that there has always been a very strong collaborative working relationship with the facility program director and managers.

When considering the location of that facility on Division Street, I must rely on the Background report and the Comment response and Matrix. From that I can glean a few points. First, this is not a daily "drop-in centre" or emergency shelter. This is a fee for service rehabilitation centre where clients are receiving prescribed treatment in a very structured setting. It is self-contained and with the background information, there is no day to day commitment to assisting some of the most vulnerable in Cobourg. There was some future looking suggestions where the Canadian Centre for Addictions could assist at the street level, but that is not part of the business model as I understand it.

Moving forward, the land use compatibility as part of the re-zoning would have minimal impact on adjacent land uses and neighbourhoods from a policing perspective. Should the business model stray from what is proposed, obviously there would have be reconsideration of this.

Sincerely

Paul VandeGraaf Chief of Police

THE CORPORATION OF THE TOWN OF COBOURG



BY-LAW NUMBER

-2021

A BY-LAW TO AMEND ZONING BY-LAW NUMBER 85-2003 (420 DIVISION STREET – 2759655 ONTARIO LTD./CANADIAN CENTRE FOR ADDICTIONS)

WHEREAS the Council of the Corporation of the Town of Cobourg held a Public Meeting in accordance with the Planning Act, R.S.O. 1990, c.P. 13, as amended, on the 30th day of November, 2020 regarding an application by Weston Consulting Inc. on behalf of 2759655 Ontario Inc./Canadian Centre for Addictions to approve a Zoning By-law Amendment for the 0.38 ha (0.941 ac) parcel of land at 420 Division Street (hereinafter referred to as the "Subject Lands");

AND WHEREAS the Council of the Corporation of the Town of Cobourg duly considered all public submissions, the applicant's background documentation, the Manager of Planning's report and all other relevant background information surrounding the subject matter, and deems it advisable to approve an amendment to Comprehensive Zoning By-law No. 85-2003;

NOW THEREFORE the Municipal Council of the Corporation of the Town of Cobourg hereby enacts as follows:

1. That By-law No. 85-2003 be amended and a new subsection 14.2.29 be added as follows:

"14.2.29 <u>District Commercial Exception 29 (DC-29) – 420 Division Street</u>

14.2.29.1 Defined Area

DC-29, as shown on Schedule A, Map 6 to this By-law.

14.2.29.2 Permitted Uses

The uses permitted in Section 14.1.1 and 14.2.2.2 and the following additional uses:

i) a Rehabilitation/Detox Treatment Centre

14.2.29.3 Regulations for Uses in the DC-29 Zone

The regulations of Section 14.2.2.4 shall apply to the uses permitted in the DC-29 Zone, with the exception of the following special provisions:

(i) Rehabilitation/Detox Treatment Centre — shall mean a private, fee-based facility that primarily offers secure, supervised specialized care, treatment and/or rehabilitation services on an inpatient basis for individuals who are addicted to chemical substances and/or alcohol. Services shall generally include 24-hour accommodation for a

period equal to or greater than seven (7) consecutive days where meals are served to patrons. The premises may also include accessory offices, lounges and meeting rooms. A Rehabilitation/Detox Treatment Centre shall not include a Group Home I or II, Emergency Care Establishment, Medical Clinic, Clinic, Wellness Centre, Boarding or Lodging House, or Hotel/Motel. For the purpose of this use, "secure" shall mean monitored and controlled ingress and egress to the facility at all times.

(ii) Parking

Parking shall be calculated with a minimum 0.5 parking spaces per bed.

(iii) Centre Capacity

40 Patrons/clients maximum.

- 2. That Schedule 'A', Map 6, attached to and forming part of By-law No. 85-2003, is hereby amended by changing the zone category of the lands as illustrated on Schedule "B" attached hereto from "District Commercial Exception 2 (DC-2) Zone" to "District Commercial Exception 29 Holding [DC-29(H)] Zone'.
- 3. The Holding (H) Symbol shall not be removed by Cobourg Municipal Council until the Owner(s) has received approval of all applicable plans, drawings, and other related documentation by the Municipality and following the execution of a Development Agreement with the Municipality and/or other authority having jurisdiction. The Agreement shall address technical matters both internal and external to the Subject Lands, including but not limited to: plans and/or other documentation pertaining to the architectural, landscape and urban design; vehicular access, visitor parking, site circulation, pedestrian connections and access; infrastructure and servicing; fencing and buffering; and, performance measures (re: financial securities and regulations for construction and use), all to the satisfaction of the Municipality.
- 4. That Schedule "B" attached hereto is hereby made part of this by-law as fully and to all intents and purposes as though recited in full herein.
- 5. THIS By-law will come into force and take effect upon final approval in accordance with the requirements of the Planning Act, R.S.O. 1990, c.P. 13, as amended.

READ and passed in Open Counc	cil on this	day of	, 2021.
Mayor		Mur	nicipal Clerk
Certified that this is a true copy of By-la Council of the Corporation of the Town			•
_	Muni	cipal Clerk	

Schedule 'B'

