

Review of 372 York St and 120 York Street Siting of Supervised Consumption Facilities (SCF)

The following analysis is based on Council's policy regarding the siting of supervised consumption facilities in London, Ontario. Below is Planning Staff's evaluation of the location criteria and site considerations established in this Council policy. It should be clear that staff are providing this information for your assistance at your request. However, this should only be considered a Planning Staff perspective and not a Municipal Council position.

The following analysis quotes the Council policy (left column of table) and then provides comments relating to the degree to which each site meets that policy in the opinion of Planning Staff.

A. Siting of Supervised Consumption Facilities

It is a policy of the City of London to ask that any proponent of a supervised consumption facility (SCF) implement the following location, design and engagement measures through the process of siting their facility.

1. Location Criteria to Benefit Those Who Use Such Facilities

For the benefit of those who use supervised consumption facilities, they should be sited in a location that is:

	372 York	120 York
<ul style="list-style-type: none"> • Within close proximity to, or near, communities where drug consumption is prevalent 	<ul style="list-style-type: none"> • The location is near the nexus of the Downtown, SoHo, Hamilton Road and Old East Village areas identified through the Health Unit's study as the primary street drug use and unsafe needle disposal locations. It is also located close to the Men's Mission shelter. 	<ul style="list-style-type: none"> • The location is in the southwest portion of the Downtown identified through study as one of the primary street drug use and unsafe needle disposal locations. However, this site does not address the areas identified for service through the Health Unit study, east of the Downtown in the Old East Village or Hamilton Road.
<ul style="list-style-type: none"> • Well serviced by transit 	<ul style="list-style-type: none"> • The site is located in within walking distance of the main hub of the future bus rapid transit system at King Street and Wellington. • The site is within 400m of many LTC routes that provide access throughout the City. • The site itself is served by the #7 bus route. 	<ul style="list-style-type: none"> • The site is located within easy walking distance to the future BRT system stop at King and Richmond. • The site is located close to several bus routes, including #5, 11 and 23.
<ul style="list-style-type: none"> • Discrete, allowing for reasonable privacy for those using the facility 	<ul style="list-style-type: none"> • This site is not located on a busy pedestrian corridor. The building and site layout on this property currently provide good sight lines. There are opportunities for positioning the entry to the facility to allow an appropriate level of privacy while maintaining good visibility within this context. 	<ul style="list-style-type: none"> • The site is located at the intersection of York and Talbot Streets. This location is more central within the Downtown than the site at 372 York, which can be described as more peripheral. York is not a busy pedestrian corridor whereas Talbot Street is a busy pedestrian corridor, across the street just north of this site. The site is also opposite the Greyhound Bus station which is a landing place for visitors to London arriving by bus and presents regular pedestrian, inter-city bus and taxi traffic at all hours.

<ul style="list-style-type: none"> Separated from busy pedestrian-oriented commercial areas 	<ul style="list-style-type: none"> This site is not located on a major thoroughfare as identified in "Our Move Forward: London's Downtown Plan." This site is not located within a busy pedestrian-oriented commercial area, but rather is located on the southeast fringe of the Downtown on a relatively automobile-oriented street. Commercial uses in the immediate vicinity are primarily auto-oriented. There is a current proposal for Venture London in the former Free Press building across the street, which is proposed to include significant small business incubation and business infrastructure to help entrepreneurship and innovation to succeed, as well as related street-oriented commercial uses onto York Street. 	<ul style="list-style-type: none"> This site is in close proximity to a number of restaurant and commercial uses on the west side of Talbot Street. The commercial operations along Talbot, north of the site, are pedestrian traffic generators. York Street at this location does not have significant pedestrian oriented commercial uses. The site is one block south of the Covent Garden Market and Budweiser Gardens, which generate large volumes of pedestrian traffic when events are running. The Cube is a large office building to the south of this site, housing high tech uses.
<ul style="list-style-type: none"> Separated from public spaces that generate pedestrian traffic or may generate crowds from time to time 	<ul style="list-style-type: none"> The London Convention Centre is 200m to the west of the site. Most pedestrian traffic from the convention centre is directed west and north toward the downtown's commercial, restaurant and hotel amenities. Most of this traffic would not be directed to the east of the Convention Centre, where this site is located. York Street, at this location, is not highly pedestrian-oriented and does not include public spaces that generate high volumes of pedestrian traffic or crowds. Note: Pedestrian primary access for the LFP building is currently located approx. 70m to the west of this site. Site servicing and loading facilities are approx. 55m east of the proposed site. 	<ul style="list-style-type: none"> The Greyhound Bus station on the opposite corner from this site is identified as an activity generator within "Our Move Forward: London's Downtown Plan". This is a primary landing point for those travelling to and from London by inter-city transit and does generate significant volumes of pedestrian traffic. The site is located less than 150m from the Budweiser Gardens and less than 100m from Rotary Square, significant community gathering spaces within the downtown. Both of these sites generate large volumes of pedestrian traffic and also generate large crowds from time to time. The site is located within an area of parking lots that are frequently used for downtown events that draw in significant visitors.
<ul style="list-style-type: none"> Close to an area with other drug addiction related support services 	<ul style="list-style-type: none"> The site is located in proximity to drug addiction support services located in the Downtown core and the Old East Village. The site is also located between the two primary mens' shelters in the city - The Salvation Army and the Men's Mission. 	<ul style="list-style-type: none"> The site is located in proximity to drug addiction support services located in the Downtown core The site is located within close proximity to the Salvation Army Shelter but is approx. 1.1km from the Men's Mission shelter on York Street.

2. Location Criteria to Avoid Land Use Conflicts

In addition to those criteria listed in Part 1, above, to avoid land use conflicts, supervised consumption facilities should be sited in a location that is:

	372 York	120 York
<ul style="list-style-type: none"> Separated from busy commercial areas or active public spaces that could generate conflicts between the general public and those leaving these facilities after consuming 	<ul style="list-style-type: none"> This site is not located within a busy pedestrian-oriented commercial area, but rather is located on the southern fringe of the Downtown on a relatively automobile-oriented street. Commercial uses in the immediate vicinity are primarily auto-oriented. There are no large parks, arenas, or other recreational facilities that generate high volumes of pedestrian traffic. The London Convention Centre is 200m to the west of the site. Most pedestrian traffic from the Convention Centre would be directed west and north toward the downtown and hotel amenities. Most of this traffic would not be directed to the east of the Convention Centre. There is a current proposal for Venture London in the former Free Press building across the street, which is proposed to include significant small business incubation and business infrastructure to help entrepreneurship and innovation to succeed, and street-oriented commercial uses. 	<ul style="list-style-type: none"> This site is in close proximity to a number of restaurant and commercial uses on the west side of Talbot Street. The commercial operations along Talbot, north of the site are pedestrian traffic generators. The Greyhound Bus Station on the opposite corner from this site is identified as an activity generator within “Our Move Forward: London’s Downtown Plan”. This is a primary landing point for those travelling to and from London by transit. The site is located less than 150m from the Budweiser Gardens and approx. 100m from Rotary Square, significant community gathering spaces within the downtown. These facilities generate large volumes of pedestrian traffic and large crowds, hosting some of London’s largest entertainment events. The site is located within an area of parking lots that are frequently used for downtown events that draw in significant visitors.
<ul style="list-style-type: none"> Separated from parks 	<ul style="list-style-type: none"> Generally, this site is separated from parks spaces that may attract youth populations. The nearest and only proximate park is Campbell Park on Dundas Street, 240m to the north of the site. Campbell Park houses London’s Homeless Memorial. 	<ul style="list-style-type: none"> Ivey Park at the Forks of the Thames which features play equipment and attracts youth is approx. 350m to the west – a substantial distance. Rotary Square and the Golden Jubilee Square are nearby, approximately 100m to the north, and are civic spaces/parks that see significant youth populations and even crowds of children during various events.
<ul style="list-style-type: none"> Separated from key pedestrian corridors in the Core Area 	<ul style="list-style-type: none"> King, York, Waterloo and Colborne Streets, which border the block in which the site is located, do not see significant pedestrian traffic in this location. This site is not located on a major thoroughfare as identified in “Our Move 	<ul style="list-style-type: none"> Of Talbot, King, Richmond and York Streets which border the block in which the site is located, only York does not see significant pedestrian traffic. The other three streets do. In “Our Move Forward: London’s Downtown Plan” Talbot and York Streets are

	Forward: London's Downtown Plan.”	not identified as major thoroughfares at this location; however, King and Richmond Streets are identified as major thoroughfares and are located on the same block as this site
<ul style="list-style-type: none"> Separated from public elementary or secondary school properties 	<ul style="list-style-type: none"> The Catholic Central Secondary School property is 260m away from the site which is less than, but relatively close to, the 300m requested by the School Board in their response to the SCF & TOPS planning amendment application process. The H.B. Beal Secondary School property is 360m away, which exceeds the 300m requested by the School Board. There are no elementary schools in the vicinity of the site. The site is relatively well removed from schools, recognizing the many criteria that are being simultaneously considered for such a facility. 	<ul style="list-style-type: none"> There are no public elementary or secondary school properties near this site. The nearest school is London Central Secondary School at over 800m away.
<ul style="list-style-type: none"> Separated from municipal pools, arenas and community centres and the Western Fairgrounds 	<ul style="list-style-type: none"> The Central Public Library, is located 420m to the northwest, is the nearest City community facility. The Western Fairgrounds are over 1km to the east of the site. 	<ul style="list-style-type: none"> Budweiser Gardens, at 150m away from this site, serves as a municipal arena from time to time Both the Budweiser Gardens and the Covent Garden Market serve as community centres from time to time – being city-owned and offering recreational programming within those spaces. The outdoor pool at Thames Park is approx. 500m away to the south – a considerable distance.
<ul style="list-style-type: none"> Not within the interior of a residential neighbourhood 	<ul style="list-style-type: none"> The uses adjacent to the site to the North, West and South are non-residential in nature. However, there are residential towers in the general vicinity of this site. The residential uses to the east (but not directly abutting the site) are in the form of high rise residential, with some commercial at grade uses, depending on the building. This site's location is not embedded within the interior of a residential neighbourhood, but rather is on the southeastern periphery of the Downtown. 	<ul style="list-style-type: none"> There is currently a proposal (recently approved for a zoning amendment by Municipal Council) to build a young mothers residential building on the northeast corner of York and Richmond, on the same block and to the east of this site (to be delivered by Youth Opportunities Unlimited). Similarly, and to the north of the YOU building, is an Aboriginal women's residential facility. Although there are residential units above ground-level retail within the block, and the block to the west (which also includes 2 residential towers) the site

		<p>is not embedded within a residential neighbourhood.</p> <ul style="list-style-type: none"> • It is noteworthy that a new residential tower is proposed to the north and east of the site, on the same block.
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3. Site Design Criteria

In addition to those location criteria listed in Part 1 and Part 2 of this policy, supervised consumption facilities should be designed to:

	372 York	120 York
<ul style="list-style-type: none"> • Incorporate Crime Prevention Through Environmental Design (CPTED) principles 	<ul style="list-style-type: none"> • Can be achieved through site design 	<ul style="list-style-type: none"> • Can be achieved through site design
<ul style="list-style-type: none"> • Meet municipal bylaws and provincial regulations for accessibility 	<ul style="list-style-type: none"> • Will be achieved through site design 	<ul style="list-style-type: none"> • Can be achieved through site design
<ul style="list-style-type: none"> • Orient building entrances to allow for reasonably discrete entry and exit 	<ul style="list-style-type: none"> • Can be achieved through site design 	<ul style="list-style-type: none"> • Can be achieved through site design, provided access is on York Street
<ul style="list-style-type: none"> • Ensure that building waiting areas and vestibules are adequately sized to avoid line-ups or waiting outside of the building 	<ul style="list-style-type: none"> • Will be achieved through site design 	<ul style="list-style-type: none"> • Will be achieved through site design
<ul style="list-style-type: none"> • Allow for easy visual surveillance of the facility and its surrounding site from the street 	<ul style="list-style-type: none"> • The building on the site is surrounded by surface parking lots which allow for easy visual surveillance 	<ul style="list-style-type: none"> • The building is surrounded by parking lots although to the immediate north the configuration offers the potential for an “alley” situation.
<ul style="list-style-type: none"> • Avoid opportunities for loitering, such as the installation of seating areas or landscape features that can be used for seating. 	<ul style="list-style-type: none"> • There are no pedestrian amenities on the site or adjacent properties. It will be important that seating areas, or landscape features that can be used for seating, are not installed as they could promote loitering. It will be important that security works to avoid loitering on adjacent parking lots. 	<ul style="list-style-type: none"> • There are no pedestrian amenities on the site or adjacent properties. It will be important that seating areas, or landscape features that can be used for seating, are not installed as they could promote loitering. It will be important that security works to avoid loitering on adjacent parking lots.

4. Engagement Measures

Consultation processes required by the Federal and Provincial governments must be met. In addition, proponents of supervised consumption facilities should host a meeting with property owners, business owners, and residents within a minimum of 120m of the proposed site to describe the proposal and operational procedures planned for the facility, hear the neighbouring property owners’ concerns, allow for consideration of measures that could be taken to mitigate these concerns, and establish a system for ongoing communication with the community.

Planning Staff Opinion

Through this review of the two sites, relative to Council's location and design criteria, Planning Staff believe that the site at 372 York is far superior. The site at 120 York Street is surrounded by activity generators that can create large volumes of pedestrian traffic and crowds – something that isn't a positive locational attribute from the perspective of the users of such facilities or for the purpose of minimizing land use conflicts. These uses include Budweiser Gardens and Jubilee Square, The Covent Garden Market and the Rotary Square, the Greyhound Bus Station, and commercial uses along Talbot Street. It is noteworthy that Youth Opportunities Unlimited drop in centre and the future residential facility for young mothers is half a block away from this site.

We recognize that the site at 372 York has been identified as a challenge for those proposing Venture London in the former Free Press building across the street, which is proposed to include significant small business incubation and business infrastructure to help entrepreneurship and innovation to succeed. Based on the meeting held in our office, and the issues that were raised, we offer the following measures that could be taken into consideration together with the Health Unit and the proposed facility operator with the aim mitigating such issues, should they choose to locate the facility at this location.

372 York Concerns and Potential Mitigation Measures

- Facility size and potential growth
 - Could the facility operator enter into an undertaking that makes commitments to Venture London relating to a size limit for the facility – for example, limit the number of booths that would be located in the facility
 - Would the operator be willing to undergo a zoning amendment that limits the total number of booths and floor space permitted on the site (through long term zoning)
 - Does the application for this facility include limitations on the site of the facility – number of booths, floor area, number of patients, etc. If not, can the application for the facility be amended to do so?
- Quality façade and site improvements
 - Funding should be incorporated into the funding application to provide for high quality façade improvements that will illustrate the positive nature of this use and express a positive built form that is an enhancement to the streetscape and community.
 - Lush tree planting and landscaping should be incorporated to contribute to the image of revitalization and vibrancy in the neighbourhood – this will need to be designed to ensure that site lines remain relatively open and clear.
 - The facility should be designed to provide privacy and discretion for those entering and exiting the facility. Furthermore, the design can help the facility to be “anonymous” to avoid stigma.
 - The location of entrances and exits should be designed in locations that ensure discretion from the street
 - Consideration of landscaping and entrances/exits should be considered collaboratively with Venture London/London Free Press property owner to determine what will work best from their perspective.
 - City of London incentives are available to assist with façade improvement
- Ensure on-site security
 - Build security costs into the business model and funding application
 - Enter into an undertaking that makes commitments to Venture London relating to security resources and their function
 - Require clients enter into agreement with established Code of Conduct to establish client peer pressure to exercise good behaviour
 - Application process requires engagement with local police
- Loitering – on site and neighbouring properties
 - The operator has indicated that security personnel costs have been incorporated into the funding application. This is critical.
 - Security should be used to conduct surveillance of the site and its surrounding sites – to ensure that loitering is not occurring on the property or adjacent properties. It may be necessary to enter into agreements with adjacent property owners to allow security to perform this important function on properties beyond the facility itself.
 - Adequate waiting spaces within the facility are important so that clients are not loitering out front or in the vicinity waiting for use of the facility. This will be important during key times of the day when demand may be higher than other times.

- Aftercare space is important to allow for users to spend time on site after consuming, rather than exiting immediately into public space
- It will be important that seating areas are not provided intentionally, or inadvertently through landscaping features, that may allow for loitering
- Close coordination with the London Police Services COR Unit will be important to ensure that drug trafficking is not occurring in the vicinity of the facility
- Relationship with adjacent neighbourhood and businesses
 - A Community Liaison Committee should be established to maintain community contacts and respond to concerns on an ongoing basis.
 - It will be important to be highly responsive to concerns so that they are addressed immediately
 - Regular meetings should be conducted and a direct point of contact should be provided for neighbouring properties and the community to reach out to
 - While it is expected that the facility will reduce the number of needles dropped in public and private spaces, sweeps of the site and surrounding area in coordination with those services would be important to create “the highest level of this service in the City within this vicinity”.
 - The Code of Conduct that has been used successfully to date in the Temporary Overdose Prevention Site will be critical to create self-policing in the vicinity amongst clients; this region should be seen as a zone where code of conduct expectations are highest in the City.
 - Co-locating support services within the facility will be important to create positive opportunities to assist with problems that currently exist in the neighbourhood
- Social innovation branding
 - There may be an opportunity to brand the facility as a social innovation centre. This could include collaboration with the University, colleges, innovation and tech centre to find new ways to help those who suffer from drug addiction.
 - This could be tied into services at the Men’s Mission, relating to the underpinnings of addiction