

May, 3 2018

City Clerk's Office
City of London
300 Dufferin Avenue
London, Ontario
N6A 4L9

Letter via email and hand delivered to City Clerk

Attention: Mayor Brown and all members of City Council

Re: **Letter of Concern: Planning and Environment Committee for the Supervised Consumption Facility Location (446 York Street) – Scheduled Item 3.6, Delegation by Dr. C. Mackie, Middlesex London Health Unit**

Dear Mayor Brown & Members of the City Council:

We were in attendance in the public gallery for the above noted meeting held at City Hall at 5:30 pm on April 30.

We send this letter to express our concern to City Council regarding the process that is being followed by the Planning and Environment Committee (Planning Committee), the lack of data submitted to the Planning Committee by the Middlesex London Health Unit, the lack of stakeholder consultation sought from the affected parties before the endorsement was made and finally the adversity to the landowners (including potential reduction in property values and reduction of market rents due to being located directly beside a safe injection site) by the implied approval of this land use change before a proper application has been submitted.

Dr. Mackie made a slide presentation with remarks to the Planning Committee in order to justify the request for an endorsement for the approval of 446 York St as one of two permanent facilities to function as a Supervised Consumption facility (SCF). He referenced a January 2018 consultant's report from the Center for Organizational Effectiveness titled Supervised Consumption Facilities. Neighborhood safety was a prime concern expressed in the Consultant's report. One of Dr. Mackie's main suggestions was there would be 24-hour security on site. No financial plan has been filed with Health Canada or presented to the Planning Committee. How do we know the funds are available for this? There has been no staffing plan filed with Health Canada, again we cannot confirm if there will be provisions for security. The use of security was a major selling point to the Planning Committee.

As property owners and landlords we have a concern about the security of the site and the potential devaluation of our property and rent rolls. Dr. Mackie put forward an argument about the property values of East Vancouver that have no bearing on the City of London. We will have to secure our properties, spend on infrastructure to accomplish this and it will be financial hardship on us, caused by this facility.

We have concerns about the lack of procedure being followed by the Planning Committee and the London Middlesex Health Unit, as no application had been submitted to the Planning Committee at the time delegation status was granted to the London Middlesex Health Unit. It appears the Planning Committee and the London Middlesex Health Unit are trying to circumvent the established rules. I wonder how other businesses, developers and individuals feel about this precedent being set. Imagine a builder asking for Delegation Status and then saying, I don't have zoning in place, I don't have a building plan or business plan, however will you approve a by-law change? That would be completely inappropriate and we feel that is the case here.

One member of the Planning Committee asked about site selection criteria. The consultant's report laid out several criteria necessary for a successful SCF location, none of this was discussed at the Planning Meeting. The committee endorsed the proposal without verifying the criteria had been met. We do not feel 446 York St. meets the criteria for an appropriate SCF noting its proximity to schools, location of commercial businesses and foot traffic associated with those businesses, high density residential units, tourist areas and volume of traffic. Also, this location is not discrete, thereby not protecting the anonymity of clients entering the facility.

Both the TVDSB and Separate School Board have stated that they do not approve of 446 York St. as it is 100 meters from Beal and 300 meters from CCH. The proposed location at 446 York is directly in the middle of 7 businesses that rely almost exclusively on customers and clients walking into their place of business. There are 17 businesses within 500 meters of this location and if the old Free Press building is redeveloped then there is potential for significantly more.

There are 4 high density residential units within 250 meters of this proposed site and many ground floor apartments in houses surrounding the area.

The volume of traffic is substantial on York St as it is a major east /west artery in the city. Jaywalking is an everyday occurrence to and from the mens mission, given its location in the middle of the block. Cities that currently have a SCF have had to lower the speed limit around their facilities as the users of the facility when leaving due to their impairment are not able to distinguish between sidewalk and road. To place these people and the drivers of vehicles on York in this risky situation is fool hardy.

The City of London has invested significant money into the Convention Center and the Western Fair District. This District is drawing more trade shows to their facilities and the Casino is expanding. York St. is the logical route for travel between these destinations.

Finally, the building at 446 is wide open and clearly visible by all cars and pedestrians that travel along York St. It is not discrete in the least.

This location fails on all the major criteria that the consultant's report put forward as considerations when selecting a site. It appears the only thing it has going for it is an owner that is willing to lease the building to the Middlesex Health Unit.

For clarity, we are disappointed and very upset that Dr. Mackie of the London Middlesex Health Unit was permitted to address the Planning Committee. This is highly irregular and creates a positive bias for and prejudice to any opposition to this proposed (assumed) land use change.

There was a constant theme put forward by Dr. Mackie and by the Planning committee in that there is an urgency to get a permanent location in place. Commendable, however, there is proper and due process that must be followed. It appears that this is being ignored for political expediency which is inappropriate. Council should act to make sure the rules are followed or precedent will be created that could have long term serious implications to the running of the City.

Sincerely,

A handwritten signature in blue ink, appearing to be a cursive combination of the names Lance Howard and Catherine Bradbury.

Lance Howard and Catherine Bradbury
Business owners and Property Owners
444 York St. and 330 Burwell St.