

Please accept my feedback for the application submitted by Middlesex London Health Unit for construction of a Clinic at 446 York Street. This permit should re-submit under the zoning classification of SCF once the appeal process has concluded since the intended use is a Supervised Consumption Facility. The London Plan now includes a specific development category for Supervised Consumption Facilities that was voted upon in response to MLHU's requests last April. Council determined in May 2018 that the existing Clinic zoning is not an appropriate classification for SCFs. The passage of the SCF Zoning Amendment serves as evidence the City knows SCFs are not Clinics.

My understanding is that applicant hopes to gain approval for Z-8971, to protect two substantial long-term commercial leases. The applicant has shared concerns in the past that there is a risk the appeals process for the SCF Zoning Amendment, may frustrate at least one contract. I have real concerns the City is not keeping in mind its vested interest when considering the application for 446 York Street. The conflict for the City is its own lease with MLHU under London Middlesex Housing Corporation. Provincial guidance appears to require SCF sites to be at least 600m apart. There is a practical need to move TOPS at 186 King Street to 446 York Street before 241 Simcoe Street can begin construction. This creates an appearance the City is ignoring the London Plan to financially benefit its subsidiary.

The planning application process must avoid "false-flag" proposals that could encourage future developers to flout the intended spirit of the London Plan and exploit technicalities.

Sincerely,

David Lundquist