

Report to Planning and Environment Committee

To: Chair and Members
Planning & Environment Committee

From: John M. Fleming
Managing Director, Planning and City Planner

Subject: Middlesex-London Health Unit /Regional HIV/AIDS
Connection
446 York Street

Public Participation Meeting on: December 10, 2018

Recommendation

That, on the recommendation of the Managing Director, Planning and City Planner, with respect to the application of Middlesex-London Health Unit/Regional HIV/AIDS Connection relating to the property located at 446 York Street the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting on December 18, 2018 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan, to change the zoning of the subject property **FROM** a Restricted Service Commercial (RSC2/RSC4) Zone, **TO** a Holding Restricted Service Commercial/Restricted Service Commercial Special Provision (h-(*))•RSC2/RSC4(____) Zone.

Executive Summary

Summary of Request

The requested Zoning By-law Amendment is to permit office uses, clinic uses in association with an office use, and medical/dental offices, in addition to the other uses already permitted on the subject site. The applicant has indicated that these uses are intended for the purposes of a supervised consumption facility.

Purpose and the Effect of Recommended Action

The purpose and effect of the recommended Zoning By-law Amendment is to permit offices uses and medical/dental office uses with the requirement that these facilities include an accessory clinic use in addition to the other uses already permitted on the subject site. The addition of these uses is intended for the provision of a supervised consumption facility within the existing building.

Minimum areas for intake and waiting areas and post-consumption areas are also recommended to be secured in the Zoning By-law.

The addition of an h-(*) holding provision is also recommended to ensure that the necessary archaeological studies are completed prior to any future redevelopment or alteration to the site requiring ground disturbance. The holding provision is such that the adaptive reuse of the existing building will not trigger the need for an Archaeological Assessment.

The recommended Zoning By-law Amendment also recognizes the existing parking as being sufficient for the recommended additional uses on the subject site.

Rationale of Recommended Action

The recommended action is consistent with the Provincial Policy Statement and conforms to The London Plan and the 1989 Official Plan. The recommended action has been modified from the requested amendment by adding regulations that require the recommended offices and medical/dental offices to be associated with an accessory clinic. These regulations are required to conform to The London Plan policies for

supervised consumption facilities which are permitted in all Place Types. The requirement that the clinic is accessory to the office and/or medical/dental office use is also required to ensure conformity with the 1989 Official Plan Office/Residential designation that applies to the subject site, which permits clinics but requires that these clinics are accessory to another use permitted in this designation. Further, the modifications made to the requested action are consistent with the provincial guidelines for the provision of supervised consumption facilities which focus on providing integrated, wrap-around services that connect clients who use drugs to primary care, treatment, and other health and social services. The recommended Zoning By-law also provides wording that the recommended uses are intended for the provision of a supervised consumption facility. While this is currently not a defined term, it provides clarification about what is intended for the facility.

Minimum areas for the intake and waiting area and post-consumption area are also proposed to be secured in the Zoning By-law. Official Plan Amendment 679 to The London Plan requires that these minimum areas be secured in the Zoning By-law. The areas secured are generally consistent with those outlined in the applicant's Planning Rationale and provincial guidelines. These minimum areas are intended to ensure that individuals are not queuing outside of the facility while waiting to use the services within the clinic, and also to ensure adequate space for those who have consumed substances to remain in the facility after consuming.

Analysis

1.0 Site at a Glance

1.1 Property Description

The subject site is located on the north side of York Street, mid-block between Burwell Street and Maitland Street. The subject site is rectangular in shape with a total site area of 845 square metres (9,096 square feet). The existing building on the subject site has an area of 353 square metres (4,876 square feet) and is set back approximately 27 metres from York Street. The subject site is currently occupied by a retail store.

1.2 Current Planning Information (see more detail in Appendix D)

- 1989 Official Plan Designation – Office/Residential Areas
- The London Plan Place Type – Neighbourhoods on a Civic Boulevard
- Existing Zoning – Restricted Service Commercial (RSC2/RSC4) Zone

1.3 Site Characteristics

- Current Land Use – Retail store
- Frontage – 16.3 metres (53.5 feet)
- Depth – 47.5 metres (155.8 feet)
- Area – 845 square metres (9,096 square feet)
- Shape – Rectangular

1.4 Surrounding Land Uses

- North – A car dealership and a 19 storey apartment building are located immediately north of the subject site. Further north are a variety of low-rise, mid-rise, and high-rise residential buildings. The lands immediately north of the subject site, occupied by the car dealership, are in the Neighbourhoods Place Type in The London Plan, while the lands further north, including the lands occupied by the 19 storey apartment building, are in the Rapid Transit Corridor Place Type. The lands are designated Office/Residential in the 1989 Official Plan.
- East – A car dealership is located immediately east of the subject site. Further east is an automobile service establishment and the sports field associated with H.B. Beal Secondary School. The lands immediately east of the subject site are in the Neighbourhoods Place Type in The London Plan and are designated Office/Residential in the 1989 Official Plan. The H.B. Beal sports field is designated Community Facility in the 1989 Official Plan.
- South – The Men’s Mission Shelter is located immediately south of the subject site. Further south is the CN Rail line. The lands south of the subject site are in the Neighbourhoods Place Type in The London Plan and are designated Office/Residential in the 1989 Official Plan.
- West – A financial business is located immediately west of the subject site. Other commercial establishments are located further west from the subject site. The lands west of the subject site are in the Neighbourhoods Place Type in The London Plan and are designated Office/Residential in the 1989 Official Plan.

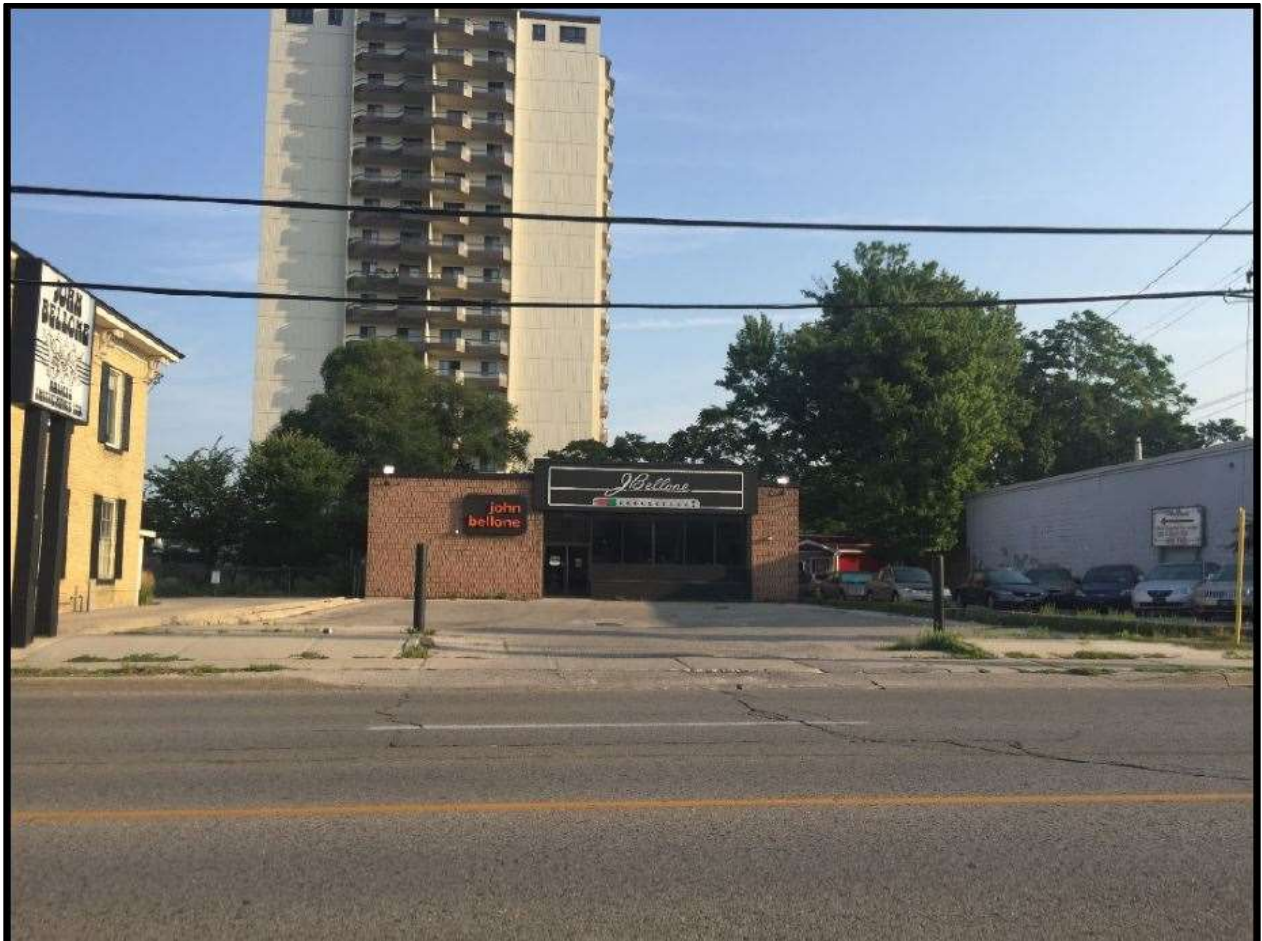
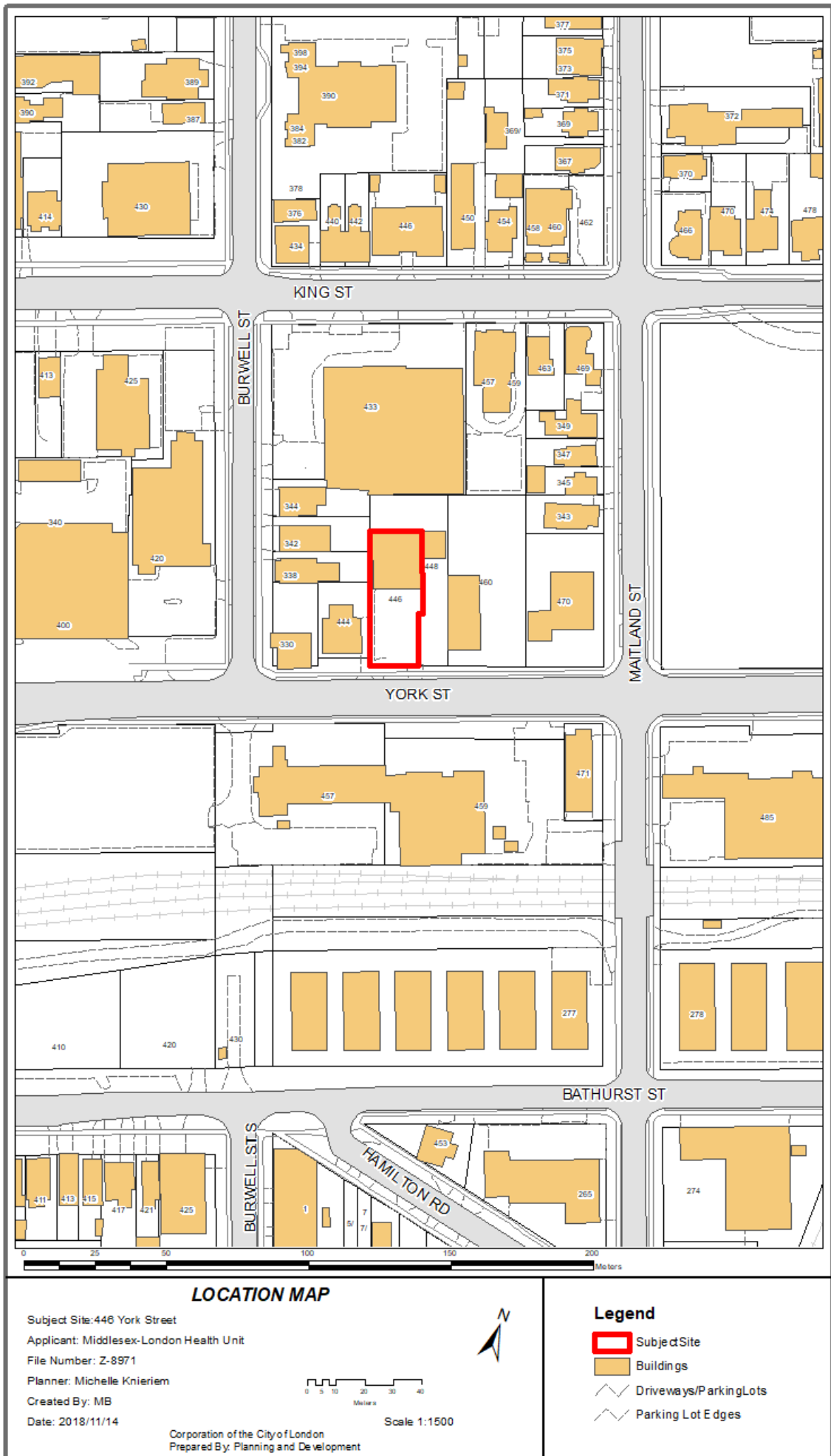


Figure 1 – Photo of subject site (provided by applicant)

1.6 Location Map



2.0 Description of Proposal

2.1 Development Proposal

The Zoning By-law Amendment application proposes to allow offices, medical dental offices, and clinics in association with offices, in addition to the range of permitted uses already permitted in the subject site. The applicant has identified that these uses are intended to operate as a supervised consumption facility, whereby the clinic use is intended for the supervised consumption of drugs while the office use and medical/dental office use is intended for wrap-around services to connect those who use drugs to primary care, treatment, and other health and social services and also to provide administrative offices for various service providers.

The applicant has indicated that office uses are intended to occupy approximately 62 percent of the facility, while the clinic use would occupy approximately 38 percent of the facility.

In May, 2018, Municipal Council adopted amendments to The London Plan, the 1989 Official Plan, and the Zoning By-law that identified Supervised Consumption Facilities as a specific use and identified policies to guide the location of these facilities, as further detailed below in Section “3.1 Planning History”. The Zoning By-law Amendment and the 1989 Official Plan Amendment were appealed to the Local Planning Appeal Tribunal, but The London Plan Amendment was not appealed and is in-force and effect. As the Zoning By-law Amendment to add a definition for Supervised Consumption Facilities is currently under appeal, “supervised consumption facilities” is not a defined term in the Zoning By-law. In the absence of a more specific definition for these facilities, the zoning definition that would apply to the use is a “clinic” use for the supervised consumption of drugs and “offices” and “medical/dental offices” for the wrap-around services. As such, the applicant has applied to permit offices and medical/dental offices and clinics as an associated use. These uses have been identified as intended for a supervised consumption facility.

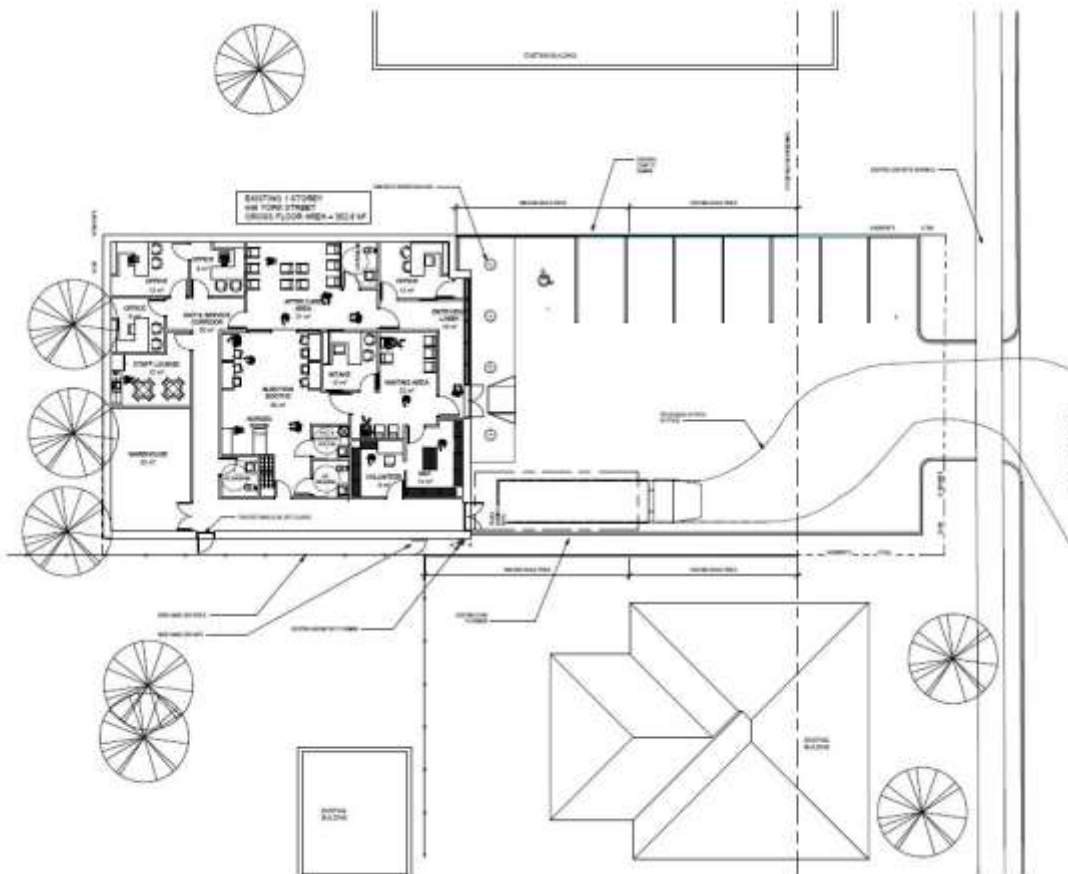


Figure 2 - Site plan provided by applicant

3.0 Relevant Background

3.1 Planning History

The subject site has not been subject to any recent applications under the Planning Act.

While the subject site has not been the subject of any recent planning applications, it is worth noting that Council has recently adopted amendments to The London Plan, the 1989 Official Plan, and the Zoning By-law with regard to Supervised Consumption Facilities. At its meeting of May 22, 2018, Municipal Council adopted amendments to The London Plan (Official Plan Amendment 679) and the 1989 Official Plan (Official Plan Amendment 680) which permitted supervised consumption facilities in all place types in The London Plan and all land use designations in the 1989 Official Plan, subject to a Zoning By-law Amendment. Certain criteria were outlined to be considered when evaluating these Zoning By-law Amendments to ensure these facilities are in locations that meet the needs of those they are designed to serve and avoid land use conflicts. Municipal Council also adopted an amendment to the Zoning By-law to add “supervised consumption facilities” as a defined term. The Zoning By-law Amendment and amendment to the 1989 Official Plan (Official Plan Amendment 680) were appealed to the Local Planning Appeal Tribunal. The London Plan Amendment (Official Plan Amendment 679) was not appealed and is in-force and effect.

3.2 Requested Amendment

The applicant’s original request was for a Zoning By-law Amendment to add a “clinic” use to the range of permitted uses on the subject site.

Through discussions with Staff, this request was revised to permit offices and medical/dental offices with clinics as an accessory use to these offices. The required provision of offices is consistent with the provincial guidelines that these facilities will provide integrated, wrap-around services that connect clients who use drugs to primary care, treatment, and other health and social services.

3.3 Community Engagement (see more detail in Appendix B)

Prior to the submission of an application, a Community Information Meeting was held by the applicant on July 25, 2018 at the London Public Library – Central Branch. This meeting was attended by approximately 43 individuals. This meeting was an open house format, which allowed members of the public to ask questions about various aspects of Supervised Consumption Facilities. City of London City Planning and Development Services Staff were in attendance at this meeting to answer any questions about the Zoning By-law Amendment process.

This application was submitted on October 10, 2018, and declared complete on October 22, 2018. A Notice of Application was sent to property owners within a 250 metre radius of the subject site on October 31, 2018 and published in The Londoner on November 1, 2018. This notification area exceeds the standard 120 metre notification radius identified by the Planning Act.

One sign detailing the development application was placed on the site, fronting York Street.

City of London City Planning Staff held a Community Information Meeting on November 26, 2018 at the London Public Library – Central Branch to provide an opportunity for the public to learn more about the application and provide feedback. Notification of this Community Information Meeting was mailed to all individuals who had identified themselves as interested parties, all landowners within 250 metres of the subject site and also mailed to all occupants within an area bounded by Queens Avenue, William Street, Horton Street, and Waterloo Street. Notices about the meeting were also posted in The London Free Press on November 17, 2018 and November 24, 2018. This meeting was attended by approximately 40 people. Comments provided centered around the function of the site as a supervised consumption facility including concerns about how the facility would function, concerns that the facility would attract an increased number of drug users to the area and associated illicit activities such as crime

and vandalism, concern about a decline in nearby property values, concern about the safety of users based on proximity to the railway tracks, and concern about proximity to schools and residences. Others spoke in favour of such facilities operating at that location. Comments were also provided that recommended limiting the requested uses to the existing building such that if there was a desire to expand the operations on the subject site, the public would have another opportunity to comment through the zoning by-law amendment process.

As of the date of this report approximately 18 interested parties have provided comment in response to this application. Concerns expressed mirrored the comments provided at the community information meeting. While many individuals expressed concerns about this application, several individuals have also contacted the file planner in support of the application.

Further information on community engagement along with copies of the written comments received with this application can be found in Appendix B.

3.4 Policy Context (see more detail in Appendix C)

Provincial Policy Statement, 2014

The Provincial Policy Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development, setting the policy foundation for regulating the development and use of land. The subject site is located within a settlement area as identified in the PPS. The PPS identifies that healthy and livable communities will be sustained by accommodating a range and mix of uses and by avoiding development and land use patterns that may cause environmental or public health and safety concerns (Policy 1.1.1). Policy 4.7 indicates that the Official Plan is the most important vehicle for implementing the PPS.

All decisions of Council affecting land use planning matters are required to be consistent with the PPS.

The London Plan

The London Plan is the new Official Plan for the City of London and has been adopted by City Council and approved by the Ministry with modifications. The majority of The London Plan is in-force and effect, while a portion of the Plan continues to be under appeal at the Local Planning Appeals Tribunal.

The subject site is located in the Neighbourhoods Place Type in The London Plan, on a Civic Boulevard. The Neighbourhoods Place Type make up the majority of the City Structure's land area. Each of our neighbourhoods provides a different character and function, giving Londoners abundant choice of affordability, mix, urban vs. suburban character, and access to different employment areas, mobility opportunities, and lifestyles (Policy 917).

The range of permitted uses for the Neighbourhoods Place Type, based on the site's location on a Civic Boulevard, is generally limited to residential uses (Table 10). However, as further discussed in the above "Section 3.1 Planning History" at its meeting of May 22, 2018, Municipal Council adopted an amendment to The London Plan that adds a definition for Supervised Consumption Facilities and identifies that this uses is permitted in all place types, subject to a Zoning By-law Amendment, and outlined a set of evaluation criteria. The Official Plan Amendment to The London Plan regarding Supervised Consumption Facilities was not appealed, as such these policies are in-force and effect as part of The London Plan.

City of London 1989 Official Plan ("Official Plan")

The City of London 1989 Official Plan ("Official Plan") implements the policy direction of the PPS and contains objectives and policies that guide the use and development of land within the City of London. The Official Plan assigns specific land use designations to lands, and the policies associated with those land use designations provide for a general range of permitted uses.

The subject site is located within the “Office/Residential” land use designation in the Official Plan. Office/Residential areas are intended to promote office/residential projects in areas adjacent to downtown, servicing as a buffer between more intense commercial development and nearby residential areas (Policy 5.1.3). Primary permitted uses in this land use designation include offices and residential uses within mixed use buildings or complexes, small scale standalone offices, and office conversions. Secondary uses, which are permitted as accessory uses, include clinics.

As discussed in the above “Section 3.1 Planning History”, Official Plan Amendment 680 was adopted by Municipal Council on May 22, 2018 which added a definition for Supervised Consumption Facilities, identified that these facilities could be permitted in any land use designation subject to a Zoning By-law Amendment application, and set evaluation criteria for reviewing locations for Supervised Consumption Facilities. While Council-adopted, this Official Plan Amendment is currently not in-force and effect as it has been appealed to the Local Planning Appeal Tribunal.

Zoning By-law Z-1

As further discussed in the above “Section 3.1 Planning History”, Municipal Council adopted a Zoning By-law Amendment to add supervised consumption facilities as a defined use in the Zoning By-law. This Zoning By-law Amendment was appealed to the Local Planning Appeal Tribunal and, as such, is currently not in-force and effect as this appeal is ongoing. Where there is not a definition for a specific use in the Zoning By-law, the existing definitions in the Zoning By-law are reviewed to find the most relevant defined use that can be applied to the requested use. In the absence of a specific definition for supervised consumption facilities in the Zoning By-law, the functions occurring within supervised consumption facilities have been determined to fall under the existing definition of “clinic” for the activities related to supervised consumption and “office” or “medical/dental office” uses for the associated wrap-around services. As such, the Zoning By-law Amendment submitted was to permit a clinic use and will be evaluated as such.

4.0 Key Issues and Considerations

4.1 Issue and Consideration # 1 – Use

The Zoning By-law Amendment application for the subject site requests to add office uses, medical/dental offices and clinics in association with a office uses as permitted uses on the subject site. These uses are intended for a supervised consumption facility.

While Municipal Council adopted amendments to The London Plan, the 1989 Official Plan, and the Zoning By-law to add a definition and evaluation criteria for supervised consumption facilities, the amendments to the 1989 Official Plan and the Zoning By-law were appealed to the Local Planning Appeal Tribunal. The amendment to The London Plan was not appealed and is in-force and effect as part of The London Plan. As such, the application for a supervised consumption facility and the offices for the wrap-around services was evaluated as office and medical/dental office use with associated clinic in the 1989 Official Plan and the Zoning By-law, and was evaluated as a supervised consumption facility in The London Plan.

Provincial Policy Statement, 2014

The Provincial Policy Statement identifies that healthy communities will be sustained by allowing for a range and mix of uses and by avoiding development and land use patterns that may cause environmental or public health and safety concerns (Policy 1.1.1). The requested introduction of office uses, medical/dental offices, and clinics in association with medical/dental offices is consistent with these objectives. Injection drug use and the opioid crisis have created a significant public health crisis in London. Supervised Consumption Facilities have been identified as playing a key role in reducing the public health risks of injection drug use among persons who inject drugs, emergency responders, waste management staff, and the general public.

The Provincial Policy Statement also identifies that the Official Plan is the most important vehicle for implementing the PPS (Policy 4.7). The below discussion on the 1989 Official Plan and The London Plan demonstrate how the requested range of uses is consistent with the objectives outlined in the Provincial Policy Statement.

The London Plan

Official Plan Amendment 679 was adopted by Municipal Council in May, 2018 and is in-force and effect. This Official Plan Amendment permits Supervised Consumption Facilities in all place types, subject to a Zoning By-law Amendment. The Official Plan Amendment outlines criteria for the evaluation of a Zoning By-law Amendment for a Supervised Consumption Facility, to ensure that these facilities meet the needs of those they serve and avoid land use conflicts.

The Zoning By-law Amendment application submitted for 446 York Street included a request to permit an “office” use and or “medical/dental office” use and an associated “clinic” use in the absence of a definition for supervised consumption facilities being included in the Zoning By-law. As the applicant indicated that this Zoning By-law Amendment is intended for a supervised consumption facility, this application was reviewed under the policies for supervised consumption facilities in The London Plan.

The subject site is located in the Neighbourhoods Place Type on a Civic Boulevard in The London Plan, which permits a range of residential uses. The London Plan identifies that supervised consumption facilities are permitted in all place types, including the Neighbourhood Place Type, subject to a Zoning By-law Amendment to be reviewed under a set of criteria to ensure that these facilities meet the needs of those they serve and avoid land use conflicts. The permissions for an office use and medical dental office use are permitted within the Neighbourhood Place Type when associated with a clinic use as part of a supervised consumption facility.

The requested Zoning By-law Amendment was reviewed under the evaluation criteria for assessing supervised consumption facilities. This assessment is outlined in the below Table 1.

Table 1 - Evaluation Criteria for Supervised Consumption Facilities

Locations that meet the needs of those they are designed to serve

| Criteria | Response |
|---|--|
| Within close proximity to, or near, communities where drug consumption is prevalent | The subject site is located near areas where drug consumption is prevalent. It is located in Central London where the information provided in the Planning Justification Report has identified as having higher concentrations of improperly discarded sharps. The subject site is also located across the street from the Men’s Mission, a shelter for homeless men. |
| Well serviced by transit | The subject site is well-serviced by transit with London Transit Commission Route 7 running immediately in front of the subject site on York Street, and Routes 2 and 20 servicing Dundas Street, two blocks north of the subject site. Further, the planned route for the City’s Bus Rapid Transit is to run one block north of the subject site, along King Street, so it is expected that transit service to the subject site will be enhanced in the future. |

| Criteria | Response |
|--|---|
| Discrete, allowing for reasonable privacy when using the facility | The proposed design of the building allows for discretion for users. Access includes an entry and exit lobby to avoid users queuing outside waiting for services and there are no windows in the waiting area or client service areas. There are also very few pedestrian-oriented commercial buildings along the street so there is limited pedestrian traffic to observe those entering/exiting the facility. |
| Separated from busy pedestrian-oriented commercial areas | The site is located along a portion of York Street with very few pedestrian-oriented commercial businesses located near the site. King Street and Dundas Street to the north of the subject site are planned to be pedestrian-oriented commercial areas, with designations in The London Plan that support pedestrian-oriented commercial uses, while York Street is not intended for that land use mix. |
| Separated from public spaces that generate pedestrian traffic or may generate large crowds from time to time | The subject site is separated from high-traffic public spaces. The closest space that may generate large crowds from time-to-time is the sports field affiliated with H.B. Beal Secondary School, which is located approximately 95 metres from the subject site. This playing field is fenced with the primary pedestrian and vehicular entrance for the sports field is off of King Street, approximately 260 metres from the subject site. |
| Close to an area with other drug addiction related support services | The subject site is located close to many other addiction related support services, including the Men's Mission, across the street from the subject site, and the Salvation Army Centre of Hope, Regional HIV/AIDS Connection, Addiction Services Thames Valley, and London Cares, which are all located approximately 1 kilometre (10 to 15 minute walk) from the subject site. |

Locations that meet the needs of those they are designed to serve

| Criteria | Response |
|---|---|
| Separated from busy commercial areas or active public spaces that could generate conflicts between the general public and those leaving supervised consumption facilities after consuming | The subject site is located in an Office/Residential designation in the 1989 Official Plan and in the Neighbourhoods Place Type in The London Plan. Neither of these land use designations are intended to facilitate the development of busy commercial areas with a high level of pedestrian traffic. The as-built context has few pedestrian-oriented business and is not a busy pedestrian area. The closest active public space to the subject site is the H.B. Beal sports field, however the primary entrance to this sports field, which is surrounded by a fence, is off of King Street and not York Street. |
| Separated from parks | The subject site is separate from municipal parks. The closest municipal parks to the subject site area Campbell Memorial Park, which is approximately 650 metre walking distance from the subject site, and Victoria Park which is 1.6 kilometers from the subject site. |
| Separated from key pedestrian corridors | The subject site is separated from key pedestrian corridors. The portion of York Street near the subject site is not intended to be a key pedestrian corridor, as both the 1989 Official Plan land use designation and The London Plan place type are not designations/place types that encourage the development of extensive pedestrian-oriented commercial uses. The as-built context also includes very few pedestrian-oriented commercial uses. |
| Separated from elementary or secondary school properties | <p>The closest schools to the subject site are Catholic Central Secondary School and H.B. Beal Secondary School. The subject site is approximately a 400 metre walking distance from Catholic Central Secondary School. The sports field for H.B. Beal Secondary School is located approximately 95 metres from the subject site, however this sports field is fenced and the primary entrance is approximately a 260 metre walk from the subject site on King Street. The primary entrance to the school building is accessible from Dundas Street and is approximately a 500 metre walk from the subject site.</p> <p>This allows for adequate separation between the subject site and schools.</p> |

| Criteria | Response |
|---|---|
| Separated from municipal pools, arenas and community centres, and the Western Fairgrounds | The subject site is separated from municipal pools, arenas and community centres, and the Western Fairgrounds. There are no municipal pools or arenas within 1 kilometre of the subject site and the Western Fairgrounds are approximately 1.3 kilometres east of the subject site. Childreach, a non-profit community centre, is located approximately 250 metres south of the subject site, but is separated from the subject site by the rail corridor, which provides a physical barrier between these uses. The YMCA is located approximately 600 metres walking distance northwest of the subject site. |
| Not located within the interior of a residential neighbourhood | The subject site is not located within the interior of a residential neighbourhood. The subject site is located in an Office/Residential designation in the 1989 Official Plan which permits a range of office and residential uses as the primary uses. The subject site is located in the Neighbourhoods Place Type in The London Plan, however it is located on the periphery of a neighbourhood, fronting an arterial road. |

Based on the analysis of the above evaluation criteria, a supervised consumption facility is appropriate at this location as this location would meet the needs of those this facility would be intended to serve and would avoid land use conflicts.

The requested office and medical/dental office uses are recommended to be required to include an accessory clinic use in order to ensure conformity to The London Plan policies, which permits supervised consumption facilities, but would not allow stand-alone office or medical dental office uses on the subject site. Office and medical/dental office uses would provide wrap-around services to those utilizing supervised consumption facilities. The provision of wrap-around services for drug users as part of the supervised consumption facilities is a provincial requirement.

1989 Official Plan

The subject site is designated Office/Residential in the 1989 Official Plan. The Office/Residential designation permits a range of office and residential uses as the primary permitted uses (Policy 5.3.1). Clinics are a secondary permitted use, however they must be accessory to one of the primary permitted uses (Policy 5.3.1). The applicant has requested to permit office uses, medical/dental office uses, and clinics in association with an office use. This requested range of uses conforms to the range of permitted uses in the 1989 Official Plan.

Official Plan Amendment 680 was adopted by Municipal Council in May, 2018. Official Plan Amendment 680 permitted supervised consumption facilities in all land use designations subject to a Zoning By-law Amendment, and outlined criteria to evaluate this Zoning By-law Amendment to ensure these facilities meet the needs of those they serve and avoid land use conflicts. This Official Plan Amendment is currently under appeal and, as such, is not in-force and effect. The criteria for evaluating supervised consumption facilities outlined in Official Plan Amendment 680 mirrored the criteria in

The London Plan, which is in-force and effect, and are outlined in the above analysis of The London Plan.

4.2 Issue and Consideration # 2 – Intensity and form

The subject site is currently occupied by a one-storey building and surface parking. The materials submitted by the applicant contemplate the requested uses being accommodated within the existing building. While there are certain limitations associated with the zoning standards for the property that would make expansion of the facility beyond the existing building footprint challenging, there is still the possibility that the site could be redeveloped in the future into a larger facility. This was a matter of concern expressed by members of the public at the community information meeting, who indicated that if a new facility was to be built there should be an additional opportunity for public consultation on the zoning.

As a result of the community sensitivity associated with the introduction of the requested uses and the careful design that is required for the site, it is recommended that the requested uses be limited to the existing building. Should the applicant wish to expand the requested uses beyond the existing building, a Zoning By-law Amendment would be required to ensure that the development to accommodate the requested uses fits with the surrounding context. The recommended amendment is consistent with what the applicant has contemplated throughout the process.

4.3 Issue and Consideration # 3 – Parking

The recommended action includes a recommendation that the existing parking be recognized to accommodate the requested additional uses. This is intended such that it would allow flexibility to accommodate various types of offices that can be included in the facility as wrap-around services without having to amend the Zoning By-law based on parking requirements. The Planning Justification Report provided by the applicant has shown that those using supervised consumption facilities predominantly walk or take public transit to access these facilities, therefore it is not anticipated that the standard parking provisions for medical/dental offices would be required in these situations. The Zoning By-law identifies that the recommended uses are intended for the purposes of a supervised consumption facility, providing further clarification on the intended use of this property.

The requirement that the recommended uses be limited to the existing building will also help to regulate the parking provision.

4.4 Issue and Consideration # 4 – Intake and waiting areas and post consumption areas

The in-force policies of The London Plan pertaining to supervised consumption facilities, require that the Zoning By-law to permit these facilities secures minimum size requirements for intake and waiting areas for consumption booths and post consumption areas. This is also consistent with the provincial guidelines which identify design standards for best practice for post-consumption areas.

The applicant has identified that the proposed facility would include 5 square metres (53 square feet) of intake and waiting areas per consumption booth and 1.9 square metres (20 square feet) of post-consumption area per consumption booth.

As per the policies in The London Plan and the Council-adopted policies in the 1989 Official Plan, staff are recommending to secure these standards in the Zoning By-law to ensure adequate space in the facility to accommodate users both before and after consumption in order to prevent line-ups outside of the facility and to ensure that users who desire to stay in the facility after consuming drugs are able to be accommodated.

An overall minimum is recommended to be added to the post-consumption area requirement, such that in no instance could less than 9.3 square metres (100 square feet) be provided. This reflects provincial guidelines which require a minimum of 9.3

square metres (100 square feet) of post consumption area for 3 consumption booths, which identifies has a marginal increase to the post consumption area as the number of booths increases.

4.5 Issue and Consideration # 5 – Archaeological potential

The subject site is located in an area that has been identified as having archaeological potential by the *Archaeological Management Plan*. The proposed reuse of the existing building is not anticipated to require ground disturbing alterations that would trigger the need for an archaeological assessment to be completed.

The addition of a holding provision is recommended to the Zoning By-law Amendment for this application, so that if any future redevelopment or alteration to the site requiring ground disturbance would require that archaeological concerns are addressed prior to construction.

It has been noted that the alterations noted on the site plan provided by the applicant, dated October 24, 2018, including fencing, painting new lines on the paved parking area, and the addition of concrete bollards, are not anticipated to adversely affect any archaeological potential that may remain on the property and that an Archaeological Assessment is not required for these alterations at the scale that has been identified in the October 24, 2018 site plan.

4.6 Issue and Consideration # 6 – Heritage adjacency

The subject site is adjacent to a property at 444 York Street that is listed on the City of London's Inventory of Heritage Resources. A Heritage Impact Assessment was provided by the applicant. This Heritage Impact Assessment was reviewed by Staff who concur with the findings of the Heritage Impact Assessment that the proposed reuse of the existing building at 446 York Street will result in no adverse heritage impacts to the adjacent heritage listed property at 444 York Street.

This item was also considered by the London Advisory Committee on Heritage.

4.7 Issue and Consideration # 7 – Concern about facility operation

Many of the comments received from the community about this application have been in regard to the operation of the facility as a supervised consumption facility. Concerns received focused on such matters as security patrols, operating hours, and the introduction of additional drug users into the area and potential increases in crime and property standards issues. The Zoning By-law Amendment application process is not able to secure the standards of operation for this facility, rather it focuses on regulating whether this is an appropriate location for the requested use.

The municipal Zoning By-law Amendment process is only one component of the supervised consumption approval process. The approval of supervised consumption facilities is also subject to ongoing federal and provincial approvals, which are required for the facility to be funded and operated. These approvals are reviewed periodically and provide an opportunity for concerns to be identified and addressed on an ongoing basis.

While it is not anticipated that the introduction of a supervised consumption facility would lead to issues with property standard or crime, the City of London's Municipal Law Enforcement division and the London Police Service provide resources to address any such issues that arise. The applicant has also identified that there would be security patrols in the surrounding area as part of the operating of this site as a supervised consumption facility.

4.8 Issue and Consideration # 8 – Concern with rail corridor proximity

Several public comments were received relating to a concern about the proximity of the subject site to the rail corridor and the safety of users of the site. The applicant submitted information as part of the Planning Rationale identifying that a Crime Prevention Through Environmental Design (CPTED) analysis of the site had identified that the train tracks could provide a potential risk to those travelling to and from the site, and those at risk of self-harm. The applicant indicated that staff would remind clients of the risks associated with crossing and using the rail tracks in the area and also notes that those clients who visit SCF report they do so because they want to use drugs in a safe place that do not harm themselves and therefore the clients are unlikely to threaten self-harm. The applicant has also indicated that if a client or visitor threatened self-harm, nurses and RHAC staff on-site are trained in de-escalation, and understand when or if it is necessary to contact emergency services to ensure that clients do not harm themselves. The applicant has also identified that there is contiguous fencing along all private properties along both sides of the rail corridor that will prevent inadvertent access to the rail line through private property.

The existing Temporary Overdose Prevention Site (TOPS) is equally within walking distance to the railway corridor and has not experienced a negative impact as a result.

Illicit drug use has been identified as already occurring on many areas throughout the rail corridor and it is anticipated that the introduction of a supervised consumption facility would not worsen the risk for drug users based on proximity to the rail corridor, but would instead provide an alternative location and supports for those using drugs that is safer than many of the locations individuals are already consuming drugs along the rail corridor.

4.9 Issue and Consideration # 9 – Community consultation

Official Plan Amendment 679 in The London Plan (in-force and effect) and Official Plan Amendment 680 in the 1989 Official Plan (under appeal) require that a consultation plan be submitted as part of the application with at least one community meeting per year. The applicant has provided a consultation plan identifying that one community meeting will be held annually. This is considered to be sufficient and meets the criteria in the Official Plan Amendments.

4.10 Issue and Consideration # 10 – Site Design

As the subject site is going through a change in use and no new development is proposed, Development Services has determined that the application would not be required to go through a Site Plan Amendment application, since it does not meet the definition of “development” which triggers the site plan requirement.

While the application (as proposed) would not be required to go through a site plan application, the design of the site for supervised consumption facilities needs to be carefully considered. Official Plan Amendment 679 that provides the policies in The London Plan guiding the location of supervised consumption facilities identifies several criteria for the design of supervised consumption facilities, including the incorporation of Crime Prevention Through Environmental Design principles, allowing for easy visual surveillance of the building, orienting the building for discrete entry and exit while allowing for visual surveillance, and avoiding opportunities for loitering.

The site plan provided by the applicant, including fencing constructed on the east and west property line, was reviewed by Development Services staff who found the site design, as proposed, to be appropriate and meet these criteria.

4.11 Issue and Consideration # 11 – Property Values

The criteria for reviewing Zoning By-law Amendment applications require that applications must be consistent with the Provincial Policy Statement and conform to the Official Plan. Property values are not a matter that is considered in the Provincial Policy Statement or the Official Plan. While property values are not a criteria that are to be used when evaluating Zoning By-law Amendment applications, it is anticipated that a well-run, properly planned facility would have limited impacts on nearby properties and their associated property values.

More information and detail is available in Appendix B and C of this report.

5.0 Conclusion

The recommended Zoning By-law amendment is consistent with the policies in the Provincial Policy Statement and conforms to the policies in the Official Plan (including policies in both the 1989 Official Plan and The London Plan).

The recommended Zoning By-law would allow for an office use with an accessory clinic use or a medical/dental office use with an accessory clinic use, with the intention that these uses would function as a supervised consumption facility. The other uses already allowed on the subject site would continue to be permitted. This use conforms to Official Plan Amendment 679 which outlines the requirements for the provision of supervised consumption facilities in The London Plan, and to the Council-adopted Official Plan Amendment 680 to the 1989 Official Plan which includes the same criteria as is in-force in The London Plan but is currently under appeal to the Local Planning Appeal Tribunal. The recommended uses also conform to the range of permitted uses in the Office/Residential designation in the 1989 Official Plan.

Additional standards are also recommended to be included in the Zoning By-law for minimum areas for intake and waiting areas and post-consumption areas and to limit the recommended uses to the existing building. The addition of these standards to the Zoning By-law are intended to ensure compatibility with the surrounding area, and ensure an opportunity for additional public input if the facility were to be expanded beyond what was contemplated in this application. The existing parking is also recognized as being sufficient for the recommended uses on the subject site.

The addition of an h-(*) holding provision is also recommended, to ensure that the necessary archaeological studies are completed prior to any future redevelopment or alteration to the site requiring ground disturbance, while allowing uses within the existing building.

While the recommended Zoning By-law Amendment includes additional standards beyond the requested Zoning By-law Amendment. It is intended to provide a greater level of detail than the requested Zoning By-law Amendment and to ensure that what has been proposed by the applicant is what is implemented. This additional level of detail ensures that the proposal conforms with Official Plan policies and is compatible with the surrounding area.

| | |
|--|--|
| Prepared by: | Michelle Knieriem, MCIP, RPP Planner II, Urban Regeneration, City Planning |
| Submitted by: | Michael Tomazincic, MCIP, RPP Manager, Current Planning, Development Services |
| Concurred by: | Paul Yeoman, RPP, PLE Director, Development Services |
| Recommended by: | John M. Fleming, MCIP, RPP Managing Director, Planning and City Planner |
| Note: The opinions contained herein are offered by a person or persons qualified to provide expert opinion. Further detail with respect to qualifications can be obtained from Planning Services | |

December 3, 2018
MT/mt

Appendix A

Bill No. (number to be inserted by Clerk's Office)
(2019)

By-law No. Z.-1-19 _____

A by-law to amend By-law No. Z.-1 to
rezone an area of land located at 446
York Street.

WHEREAS Middlesex-London Health Unit/Regional HIV/AIDS Connection have applied to rezone an area of land located at 446 York Street, as shown on the map attached to this by-law, as set out below;

AND WHEREAS this rezoning conforms to the Official Plan;

THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

- 1) Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 446 York Street, as shown on the attached map comprising part of Key Map No. A107, from a Restricted Service Commercial (RSC2/RSC4) Zone to a Holding Restricted Service Commercial/Restricted Service Commercial Special Provision (h-(*))•RSC2/RSC4(_____) Zone.
- 2) Section Number 3.8 2) of the Holding "h" Zone is amended by adding the following Holding Provision:

-) h-(*)
- Purpose: The proponent shall retain an archaeologist, licensed by the Ministry of Tourism, Culture and Sport under the provisions of the Ontario Heritage Act (R.S.O. 1990 as amended) to carry out a Stage 1 (or Stage 1-2) archaeological assessment of the entire property and follow through on recommendations to mitigate, through preservation or resource removal and documentation, adverse impacts to any significant archaeological resources found (Stages 3-4). The archaeological assessment must be completed in accordance with the most current Standards and Guidelines for Consulting Archaeologists, Ministry of Tourism, Culture and Sport.

All archaeological assessment reports, in both hard copy format and as a PDF, will be submitted to the City of London once the Ministry of Tourism, Culture and Sport has accepted them into the Public Registry.

Significant archaeological resources will be incorporated into the proposed development through either in situ preservation or interpretation where feasible, or may be commemorated and interpreted through exhibition development on site including, but not limited to, commemorative plaquing.

No demolition, construction, or grading or other soil disturbance shall take place on the subject property prior to the City's Planning Services receiving the Ministry of Tourism, Culture and Sport compliance letter indicating that all archaeological licensing and technical review requirements have been satisfied.

Permitted interim uses: uses within the existing building where no soil disturbance takes place.

3) Section Number 28.4 of the Restricted Service Commercial (RSC4) Zone is amended by adding the following Special Provision:

-) RSC4() 446 York Street
 - a) Additional Permitted Uses
 - i) Offices with accessory Clinics for the purposes of a Supervised Consumption Facility.
 - ii) Medical/dental offices with accessory Clinics for the purposes of a Supervised Consumption Facility.
 - b) Regulations
 - i) Additional Permitted Uses shall be restricted to the existing building.
 - ii) Parking Spaces 8 for all Additional Permitted Uses within the existing zone
 - iii) Minimum intake and waiting area 5 square metres (53 square feet) per consumption booth.
 - iv) Minimum post consumption area 1.9 square metres (20 square feet) per consumption booth; but in no instance shall less than 9.3 square metres (100 square feet) be provided.

The inclusion in this By-law of imperial measure along with metric measure is for the purpose of convenience only and the metric measure governs in case of any discrepancy between the two measures.

This By-law shall come into force and be deemed to come into force in accordance with Section 34 of the *Planning Act, R.S.O. 1990, c. P13*, either upon the date of the passage of this by-law or as otherwise provided by the said section.

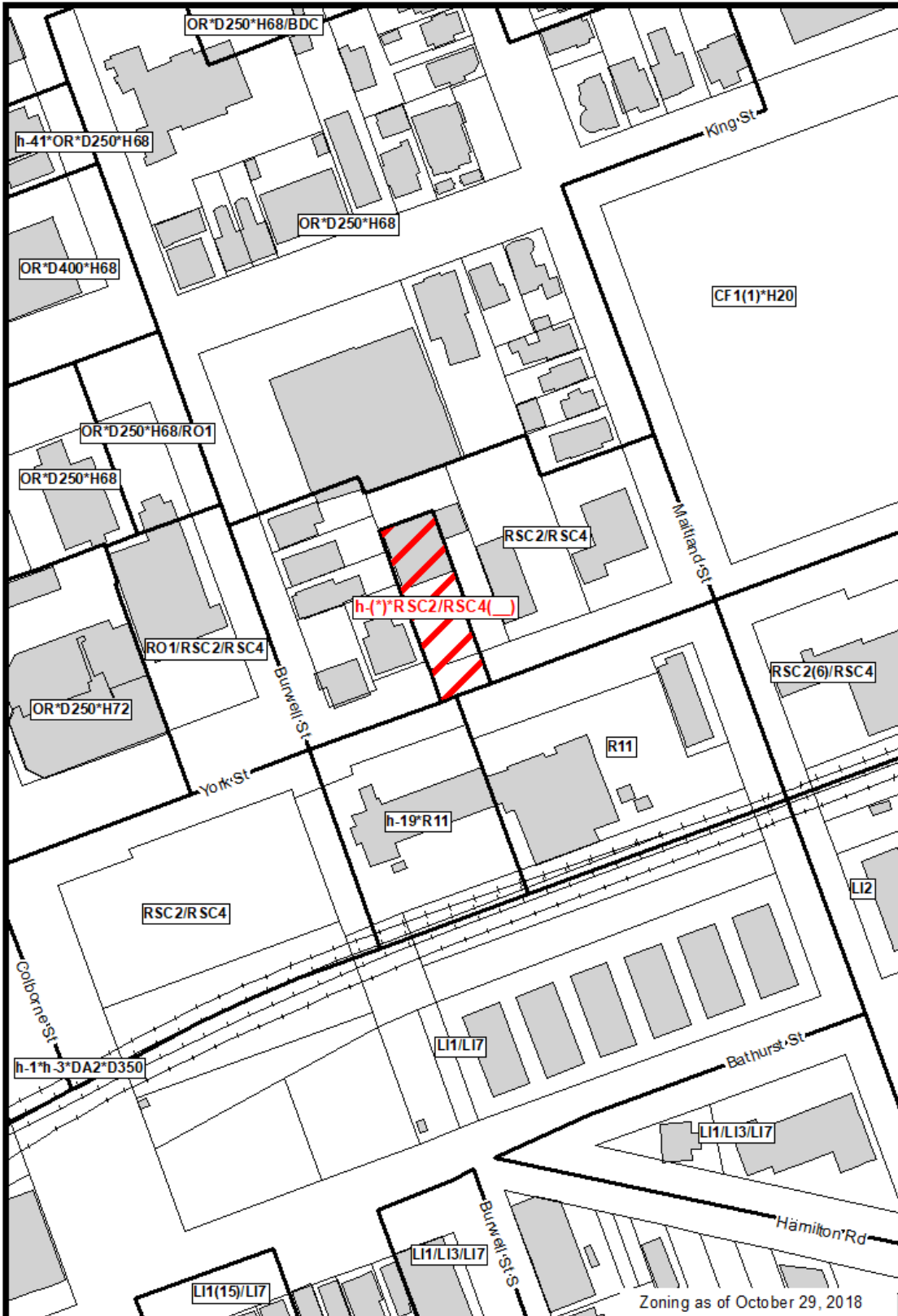
PASSED in Open Council on December 18, 2018.



Ed Holder
Mayor

Catharine Saunders
City Clerk

First Reading – December 18, 2018
Second Reading – December 18, 2018
Third Reading – December 18, 2018

AMENDMENT TO SCHEDULE "A" (BY-LAW NO. Z.-1)



| | |
|---------------------------|---|
| File Number: Z-8971 | SUBJECT SITE  1:1,500 0 5 10 20 30 40 Meters  |
| Planner: MK | |
| Date Prepared: 2018/11/14 | |
| Technician: MB | |
| By-Law No: Z.-1- | |

Appendix B – Public Engagement

Community Engagement

Public liaison: On October 31, 2018, Notice of Application was sent to 701 property owners in the surrounding area and individuals who had identified themselves as interested parties at the pre-application community information meeting and through the process involving the City-wide Supervised Consumption Facility amendments. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on November 1, 2018. A “Planning Application” sign was also posted on the site.

20 replies were received.

Nature of Liaison: The purpose and effect of this zone change is to permit a clinic, in addition to the other uses already permitted on the subject site. Possible change to Zoning By-law Z.-1 from a Restricted Service Commercial (RSC2) Zone and a Restricted Service Commercial (RSC4) to a Restricted Service Commercial (RSC2) Zone and a Restricted Service Commercial Special Provision (RSC4(_)) Zone to permit a clinic use in addition to the other uses already permitted on the subject site. This clinic use is intended for a supervised consumption facility.

A Revised Notice of Public Meeting mailed on November 28, 2018 and placed in *The Londoner* on November 29, 2018 slightly modified this to recognize that the majority of the facility surrounding the clinic use was offices intended to provide wrap-around services to the supervised consumption facility, and to identify that Municipal Council may also consider certain modifications to the application. This revised notice indicated that the purpose and effect of this zone change has been revised to permit an office use, a clinic in association with an office use, and a medical/dental office, in addition to the other uses already permitted on the subject site. Possible change to Zoning By-law Z.-1 from a Restricted Service Commercial (RSC2/RSC4) Zone to a Restricted Service Commercial/Restricted Service Commercial Special Provision (RSC2/RSC4(_)) Zone to permit an office use, a clinic use in association with an office use, and a medical/dental office in addition to the other uses already permitted on the subject site. This clinic use is intended for a supervised consumption facility. This notice has also been revised to identify that Municipal Council may also consider modifications to the requested special provisions, including the addition of office and medical/dental office as permitted uses, the requirement for clinics to be associated with an office use, parking reductions, and minimum size requirements for intake and waiting areas for consumption booths and minimum post consumption area. The addition of a holding provision may also be considered.

Responses: A summary of the various comments received include the following:

Concern for:

Impact on property standards:

There was concern that individuals who have been consuming drugs in the facility will cause property damage to public or private property. The applicant has identified that there would be security patrols associated with the facility. The City also has the London Police Service and the Municipal Law Enforcement division to ensure public and private property is not damaged and property standards are maintained.

The facility operating hours are insufficient:

There was concern that the facility operating hours were not long enough, and that the facility should be open 24 hours per day. The applicant has indicated the facility will be open 12 hours a day, with the hours limited by budgetary constraints. The operating hours of the facility are not able to be secured in the Zoning By-law Amendment.

Increase in crime:

Many community members expressed concern that a supervised consumption facility would lead to an increase in crime. The applicant has indicated that the facility would have security patrols of the surrounding area during the operating hours of the facility. The London Police Service also provides a resource to address any crime.

Impact on property values:

The criteria for reviewing Zoning By-law Amendment applications require that applications must be consistent with the Provincial Policy Statement and conform to the Official Plan. Property values are not a matter that is considered in the Provincial Policy Statement or the Official Plan. While property values are not a criteria that are to be used when evaluating Zoning By-law Amendment applications, it is anticipated that a well-run, properly planned facility would have limited impacts on nearby properties and their associated property values.

Proximity to schools:

Community members identified concern about the proximity of the subject site to schools. The closest schools to the subject site are Catholic Central Secondary School and H.B. Beal Secondary School. The subject site is approximately a 400 metre walking distance from Catholic Central Secondary School. The sports field for H.B. Beal Secondary School is located approximately 95 metres from the subject site, however this sports field is fenced and the primary entrance is approximately a 260 metre walk from the subject site on King Street. The primary entrance to the school building is accessible from Dundas Street and is approximately a 500 metre walk from the subject site, and the secondary entrance on King Street is approximately a 400 metre walk from the subject site.

These factors combine to allow for adequate separation between the subject site and nearby schools.

Site is not discrete:

There was the concern that the site is not discrete and would not allow privacy for users. The applicant has identified that there will not be visibility through any windows at the front of the building. Further, the dedicated waiting area for those wishing to use the consumption booths would allow adequate space for individuals to wait inside the facility so that they are not lining up outside.

Proximity to residential uses:

There was the concern that the subject site did not meeting the criteria in The London Plan that supervised consumption facilities be located not in the interior of a residential neighbourhood. The subject site is close to residential uses, however it is located in a mixed-use context including businesses, offices, automobile service uses, and institutional uses. The subject site is also not located in the interior of a residential neighbourhoods, rather it is located on the exterior of the neighbourhood fronting onto an arterial road.

Concern that individuals will be queuing outside the facility to wait to consume drugs:

There was the concern that there would be individuals lining up outside the facility to use drugs. The recommended Zoning By-law amendment includes a minimum waiting area for those who intend to consume drugs, which is anticipated to be sufficient based on provincial guidelines. This is intended to prevent people from lining up outside the facility.

Responses to Public Liaison Letter and Publication in “The Londoner”

| Telephone | Written |
|--|--|
| Deana Ruston 807-433 King Street London, ON N6B 3P3 | Doug and Anne Sutton 507-389 Dundas Street London, ON N6B 3L5 |
| | Fran Carroll 1406-430 King Street London, ON N6B 1S7 |
| | Lance Howard 444 York Street London, ON N6B 1R2 |
| | Sharon Krogman 482 Jarvis Street London, ON N6K 1X1 |
| | Marilyn and David Beach 21-2081 Phillbrook Drive London, ON N5X 3A4 |
| | Lorrie Riles 53 Simms Court London, ON N5Z 5E7 |
| | Melody Hudson and Jecht Zea-Wilde N/A |
| | David Lundquist 191 Grey Street London, ON N6B 1G2 |
| | Paul Pritiko 485 York Street London, ON N6B 1R4 |
| | Joseph Sommerfreund 1-279 Hyman Street London, ON N6B 2G6 |
| | Carrie O'Brien P.O. Box 600 Komoka, ON N0L 1R0 |
| | George Bikas P.O. Box 600 Komoka, ON N0L 1R0 |
| | George Meek |
| | Margaret Stewart 703-389 Dundas Street London, ON N6B 3L5 |
| | Kasia Olszewska 318 Wellington Road London, ON N6C 4P4 |

| Telephone | Written |
|-----------|--|
| | Amanda and Jose Fonseca 342 Burwell Street London, ON N6B 2V9 |
| | Megan Walker 797 York Street, Unit 5 London, ON N6A 5P9 |
| | Adriana Keresztes 340 Colborne St London, ON N6B 3N1 |
| | Analee Baroudi 150 Dufferin Avenue, Site 206 London, ON N6A 5N6 |

Public Comments

From: Anne Catherine
Sent: Tuesday, November 27, 2018 8:21 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: Zoning By-Law Amendment 446 York Street

Michelle Knierie Services
Planning Services,
City of London.
206 Dundas St.,
London, ON
N6A 1G7

In attending the meeting Monday, November 26, at the Central Library, as opposed to being reassured I left feeling more concerned.

When we left our building to attend the meeting last night there was an individual sprawled on our couch in our lobby, obviously high and another smoking outside the locked door we needed to exit. He had jammed an old lottery ticket into the door lock for free access in and out. When we picked up the lottery ticket and took it with us he became agitated swearing and hitting the side of the building. We waited until we were a good distance from the building before calling our office to let them know what was going on. Again something that is not really requiring a police call unless it escalated but not improving quality of life downtown.

At the meeting we were reassured that there would be security outside the clinic. Hearing that my first concern is you are opening a clinic in a residential area where you obviously feel you need security and second that security is only during operational hours. The rest of the time the community is on its own so we have to deal with incidents like last night that are increasing. These are not incidents that are reflected in police records. You talked about increased foot patrols by police but we have certainly not witnessed that and just having to identify the need for increased police presence speaks to the legitimate concerns of neighbours. However there has been a definite increase in aggressive pan handling, petty theft including bikes, and break-ins to buildings in the area. All this effects the quality of life of downtown citizens.

You also reassured us that people receiving assistance from a clinic like this tend to move closer and to stay in the area. Not reassuring!

We know that most of the clients visiting this clinic are not employed but must purchase their illegal drugs. The only income generating jobs available are pan handling, theft, prostitution, break-ins to both cars and buildings and of course the retail side of illegal drugs which is a bigger concern when this is so close to major schools.

In daily walks around Victoria Park the change in atmosphere is evident as garbage pails are often left open or at times emptied on the ground and it was not unusual to

come across an individual sprawled out on the lawn this fall (in better weather) obviously under the influence. I have enclosed a picture of clothing left at the north west entrance to Victoria Park including women's less than clean intimate apparel. This is not a reassuring atmosphere for both residents and visitors.

Also a concern identified but not addressed is the large developers who were planning to build downtown who have now apparently backed out? One of those on the site of the Family Circle Restaurant and the other in the old Free Press building, both near these proposed sites. If this is the case obviously they are aware of the downturn expected in both these neighbourhoods and are not willing to invest.

It seems you are spending tax payer money on downtown to rejuvenate it while on the other hand planning its demise with little regard for the taxpayers or those living here who listened to your promises of rejuvenation. You also clearly stated there would be no assistance for loss of value of real estate in the area.

We are only allowed two of these clinics in our city. The fact that you would even consider imposing two sites on the downtown when we are clearly not the only area with this identified problem speaks to a disregard to taxpayers' money spent on the downtown and to its residents. The lack of concern from city hall and acknowledgement of the residents in this area, other than the official steps necessary, speaks volumes.

I see a need for clinic of this nature but a bigger clinic not near a residential area and especially a much greater distance from schools, one that also is 24 hours, that offers food, clothing, showers and rehabilitation when possible, where there are emergency beds where police can take clients whose behavior is beyond the client's control. A clinic away from residential units and especially schools. We all know the return to a healthy neighbourhood is a long and expensive road to travel with sometimes never regaining lost ground. This is supposed to be the heart of our city and in haste to deal with this crises I believe the city under pressure from the Middlesex Health Unit has not treated this issue with due diligence and in a fair manner.

Respectfully,
Doug & Anne Sutton

From: fran carroll

Sent: Tuesday, November 27, 2018 8:20 PM

To: Knieriem, Michelle <mknieriem@london.ca>

Subject: Comments on the permanent supervised consumption site 446 York St

Dear Michelle at City of London Planning Services

I am writing to you with regards to my concerns of having a permanent supervised consumption site at 446 York Street; it's in my neighbourhood. I live at 430 King Street located at King and Burwell, on the 14th floor facing east and south. The apartment building is located on the northwest corner of the intersection.

I have lived in this building for 10 years and have seen the changes in the neighbourhood. Since living in the building I have got rid of my car and walk daily in the neighbourhood: to work, both markets, the library, the bank, etc.

In the last few years it has become not as safe as it used to be. I deal with individuals in psychosis states raging in anger where I have to cross the street because their behaviours are unpredictable. I also deal with individuals high on (I am assuming drugs) reaching for imaginary things in thin air not there and in high energy states. Their behaviours are unpredictable and I feel very unsafe. I run into these behaviours frequently and am petrified when I have to pass them.

I also deal with extremely high volume siren traffic from emergency response vehicles when there are bad drugs in the neighbourhood. The constant sirens put one on edge because it is 24 hour a day occurrence and then it cools down again.

My bedroom window faces south towards the area of the Men's Mission; frequently during the warmer months in the middle of the night I am awoken to fights, angry yelling, etc from individuals hanging around the area when the weather is warm.

In the summer when I walk to the YMCA for an early morning work out there are numerous individuals sleeping and waking up on the grassy areas of King Street. Yes, I have to walk pass them. I don't have a problem with their sleeping; it is only their waken state; and there is no one else around at that time of the morning.

In the winter there have been men sleeping in between the front doors of the building where I live and I am forced to exit through the back where there are also individuals going through the garbage or sleeping under the overhang. I don't feel safe.

In the last year, street people have got into the building and lived in the stairwells.

My concern for the new site is that you say there will be security but I am doubtful it will extend to where my building is a block away. Also this will encourage more people hanging out. I've seen people already hanging out and checking out the parked cars. I want to be able to walk safely out my doors when I go to work in the morning and when I come home at night. I am not getting into a car; I am walking and this behavior is very much in my face and with the new site will only encourage more erratic behavior, more individuals hanging out, more emergency response sirens. I fully support the need for the site and the wraparound services it provides; however please keep the site at the location on King Street downtown where there are minimal residential areas.

Thank you for taking the time to read my concerns. If you want any further information please send me an email or phone me at .

Fran Carroll

From: Lance Howard
Sent: Tuesday, November 27, 2018 8:57 AM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: 446 York St planning meeting last evening

Hello Ms. Knieriem, My wife and I attended the public meeting last evening at the London Public Library. We are landowners at 444 York and 330 Burwell St as well as run a business out of 444 York.

Could you please forward the slide presentations that were used by the presenters last evening, I believe there were 3.

Thank you

Best Regards,
LANCE HOWARD CFP,CLU
Certified Financial Planner and Insurance Advisor
Save it wisely, spend it well, enjoy life

The Lance Howard Group Inc.
444 York St.
London, ON N6B 1R2

Confidentiality Note: The information contained in this message is legally privileged and confidential information intended only for the use of the addressee(s) named above. If the reader of this message is not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this message is strictly prohibited.

From: Sharon
Sent: Tuesday, November 27, 2018 8:38 AM

To: David Lundquist ; Knieriem, Michelle <mknieriem@london.ca>
Cc: ; Bonnie ; Lance Howard; Paul; Ray Earnst; Shireen Mamika; Vanessa Verworn;
yazan el-shalabi; crystal pirie; Andre Leite
Subject: Re: Applicant for 446 York

We also expressed the concerns of the railroad tracks and also lack of fire exists in the 446 York Street building. There is no way to have a back exist because we own the property behind the building.

Yes, I agree that the staff did seem open to at least hearing our concerns. it's more than we've ever gotten before.

Thanks again for all you're doing,

Sharon

From: David Lundquist
Sent: Tuesday, November 27, 2018 8:02 AM
To: Knieriem, Michelle <mknieriem@london.ca>
Cc: Bonnie; Lance Howard; Paul; Ray Earnst; sharon krogman; Shireen Mamika; Vanessa Verworn; yazan el-shalabi ; crystal pirie; Andre Leite
Subject: Applicant for 446 York

Dear Michelle,


Thank you for all the information last night. I believe many in our group were surprised that some of your staff seemed deferential to MLHU and the RHIVC (the applicants). I would hope the planning department is remaining impartial. The applicant argued for the amendment to the London Plan they now seem uninterested in using to apply for 446 York. An SCF is not a Clinic, based on the council decision in May 2018.

Additionally, some of our group wondered what steps the applicant would undertake to deal with the 300meters of open rail track. Will you be addressing this concern?


I am enclosing a copy in this email the list of questions submitted by community members in Ward 13 that we presented at the meeting last night. These questions were the chosen from a list of 75.

Kind regards,
David Lundquist

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City of London Planning Services
COMMUNITY INFORMATION MEETING
Permanent Supervised Consumption Site
446 York Street



Addressing London's street-drug addiction crisis

London's Downtown is in crisis. Nearly 6000 in this city are addicted to dangerous street-drug cocktails. Our community needs a comprehensive approach that offers proven pathways to treatment for everyone

21
Questions



Here are 21 questions our community needs to ask when considering the Application Proposal by Middlesex London Health Unit

1. What percentage of injection narcotic users are being served by the overdose prevention site?
2. Why is TOPS only open 6 hours per day (5 hours Sat and Sun)?
3. How many needles is the overdose site diverting from the streets per 100 needles distributed?
4. What percentage of overdoses are taking place in the city versus happening at the overdose prevention site?
5. What legal liability do volunteers have if they administer Naloxone incorrectly?
6. How often do injections at Overdose Prevention Site contain crystal meth?
7. If the proposed Overdose Site is permanent why are you leasing a small commercial space instead of building your own facility?
8. What type of research did you do for site selection?
9. What is the expansion potential for the York site?
10. How many city-blocks are "wrap around" services away from the York site?
11. How many bus routes service the York site?
12. What impact will the proposed OD Site have on emergency room visits?
13. What is the maximum number of people the York site can accommodate per hour?
14. How will you prevent addiction triggers caused by social interaction among clients at the site?
15. If the Men's Mission closes as a homeless shelter, how will that impact your facility?
16. What types of substance testing is being done before a client injects the drugs?
17. What will prevent people loitering after hours?
18. Is it possible accidental Naloxone administration will occur?
19. How will you protect the public from drug users who experience drug psychosis and extreme paranoia?
20. Why not build the injection site at 241 Simcoe Street first?
21. Where will children wait if a single parent is using the York location?

[Note: Above questions provided by community member, attached to email, and distributed by a community member at the Community Information Meeting on November 26, 2018]

From: Marilyn Beach
Sent: Monday, November 26, 2018 7:23 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: 446 York Street

Hello, my husband and I are unable to attend the meeting tonight but we wanted to let you know that we fully support the Zoning By-law Amendment to permit a clinic. We feel it is very important that London offer supervised injection sites.

Marilyn and David Beach

From: Lorrie Riles
Sent: Monday, November 26, 2018 5:18 PM

To: Knieriem, Michelle <mknieriem@london.ca>

Subject: Fwd: Proposed Supervised Consumption Facility @ 446 York Street

Subject: Proposed Supervised Consumption Facility @ 446 York Street

Dear Ms. Knieriem,

I am unable to make it to the Community Information Meeting today but would like to express my opinion.

I do not understand the justification for providing a location for individuals to use *illegal* substances. I understand that the idea is to prevent users from injuring themselves or overdosing but it is still illegal no matter how you look at it. Our dollars would be better off spent offering support to individuals with substance abuse problems to get themselves off of drugs rather than sustaining their abuse and addiction to no end. What's next, a theater that shows child pornography open to pedophiles to keep them off the streets?

I very rarely speak out on issues but this is one that I feel very strongly about. It may be too late to make any difference but I do want to express my opinion on this matter.

Thank you for taking the time to read this.

Regards,

Lorrie Riles

From: Melody Hudson
Sent: Thursday, November 22, 2018 2:49 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: 446 York Street

Hello,

My fiancé and I both reside in one of the apartments at 433 King Street, but are unable to make the community meeting about the consumption site at 446 York Street on Nov. 26th. So we wanted to reach out to you and relay our opinions on the matter.

We both strongly believe that this new clinic is a well needed addition to our community. And we believe that every community should have access to one, as there are many people who need the support it will provide. We know that most people in these situations, do not/are not able to travel very far to receive the help they need. So when we heard that there was a proposed clinic in our area, we were happy, as that meant more people in our community would have a safe place where they could learn healthier ways of dealing with their drug addiction, people to help get them through it, and refer them to other supports they can benefit from.

We have been long supporters of the Regional HIV/AIDs Connection and the hard work they have been doing, in our community, and in many others. So we know that if it is something they support, it is for good reason.

The situation will never change if we do not try different solutions to the problem. No solutions are perfect at the beginning, but the more we try, the more we know what does or doesn't work. And these are literally life and death situations, which makes it all that more important to try, as every success is a life. Plus there are lots of examples of these sorts of clinics being effective in general, so it something my fiancé and I believe we should implement in this community, and hopefully in the future, throughout London. Not to mention that financially, it is much better for community to fund a consumption site than to not help people with drug addictions, as it is much more cost effective than the ambulances, emergency trips, police involvement etc. that result from their conditions being untreated/unsupported.

If evidence, trials in different places (like Alberta), the Regional HIV/AIDS Connection, and Middlesex-London Health Unit all support this clinic, than both me and my fiancé stand by them, and hope that our community will do the right thing, and continue with the planned consumption site at 446 York Street.

Thank you,
Melody Hudson and Jecht Zea-Wilde

From: David Lundquist
Sent: Tuesday, November 20, 2018 10:13 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: REPLACEMENT z-8971

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 to 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

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From: Paul Pritiko
Sent: Monday, November 19, 2018 12:02 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: Re: Z-8971

Are you abler to provide the new guide line rules the Provincial government has applied for locations where a safe injection sire can be located and guidelines on how it is top be operated ?

Or can you point me in the proper direction on where they can be obtained ?

Thanks

Paul Pritiko

From: Joe Sommerfreund
Sent: Monday, November 19, 2018 12:00 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: Application for rezoning re: 446 York Street for Supervised Consumption Facility

I fully support this application. I believe that such a facility is absolutely necessary as part of an overall harm reduction plan. There can be no question that it saves lives.

I believe that this is an excellent location as well. It is downtown, is on or within a short walk of major bus routes, is quite a number of blocks from residential premises, and has parking nearby.

I hope this application succeeds and that the facility receives provincial approval as quickly as possible.

Joseph Sommerfreund
1-279 Hyman Street, London
N6B 2G6

From: Anne Catherine
Sent: Saturday, November 17, 2018 5:05 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Cc: christine.elliottco@pc.ola.org; MPP <tkernaghan-qp@ndp.on.ca>; Park, Tanya <tpark@london.ca>
Subject: Supervised Consumption Facility.

Michelle Knieriem
Planning Services
City of London,
206 Dundas St.,
London, Ontario
N6A 1G7
File: Z-8971

I am strongly oppose to the site at 446 York Street as a Supervised Consumption Facility. This site is close to a very large number of residential units, schools and at least one day care. It is also not far from the methadone clinic at 528 Dundas Street which is approximately 500 meters from the proposed site.

In researching articles on Supervised Sites in other neighbourhoods it is obvious there has been a negative impact on the neighbourhood where many social services are offered within a small area. We are with in walking distance to The Men' Mission, Parole office for Correctional Service of Canada, The Salvation Army Center of Hope, City of London Social Services, The Good Will, My Sisters Place, The John Howard Society, St Leonard's Society of London, a half way house and the Methadone Clinic at 528 Dundas Street.

A number of people especially those retired and over the age of sixty-five moved downtown to be able to walk freely about our neighbourhood, attend events downtown, go to restaurants, the library, the market and so on. Quality of life and petty crime are not measured by police statistics. When clients leave these Supervised Consumption Facility they leave high. These clients also need to purchase their illegal drugs. Most can't hold a job so resort to petty crime, pan handling, break-ins etc., all in the same neighbourhood. The retailers/ dealers for this business also move to where their clientele are which again creates a less than savory environment.

I would like to see this proposed clinic moved to an area with fewer residential units, away from schools and daycare and in an area where the impact of such a clinic would be reduced.

In an effort to help those stuck in this vicious cycle its important not to over look and to respect the permanent residents and businesses who have invested in their homes and neighbourhoods and that includes downtown residents.

Respectfully,
Anne & Doug Sutton

Sent from my Windows 10 device

From: Paul Pritiko
Sent: Friday, November 16, 2018 5:10 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Cc: Doc Services <DocServices@london.ca>
Subject: File: Z-8971

Applicant: Middlesex-London Health Unit

Ms. M. Knieriem,

I am taking the time to notify you and the City of London that we object to the zoning application for 446 York Street. I am making it know that we oppose the transfer of zoning to allow a supervised consumption facility.

Please place me on record opposing this application so I may participate in the planning process and have a chance to speak at the committee information meeting on Monday, November/26th.

Thank You

Paul Pritiko
485 York Street
London, Ontario

From: Carrie O'Brien
Sent: Friday, November 16, 2018 12:12 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Cc: George Bikas
Subject: Re: Zoning By-law Amendment Application - 446 York Street

Hi Michelle,

Happy Friday!

I'm following up on the ZBA proposal for 446 York St. on behalf of Drewlo Holdings.

Previous emails forward to us by other parties had included the below response from yourself regarding the addition of a definition for SCF. We were aware of the attached Policy approved by Council but were never circulated on a change/addition of definition. Can you point me to the appropriate Council agenda/minutes so I can review that in preparation for our comments submission before November 20.

Thanks in advance!
Carrie

Council did specifically adopt a definition for Supervised Consumption Facilities to be included in the Zoning By-law however this was appealed to the Local Planning Appeals Tribunal, as such isn't in-force-and-effect (meaning it can't be used right now). As such, we are left with finding what existing definition in the Zoning By-law would apply to such a facility. Our Zoning Department determined that the definition that would apply to define this use based on the existing list of definitions is "clinic".

Drugs are not prescribed at supervised consumption facilities, the users bring in their own drugs for consumption.

Please let me know if you have any further questions.

--

CARRIE O'BRIEN
Land Planner
Drewlo Holdings Inc.
P.O. Box 6000, Komoka ON N0L 1R0
<https://www.drewloholdings.com>



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From: David Lundquist
Sent: Thursday, November 15, 2018 6:05 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: Re: Fw: Upcoming Community Information Meeting - 446 York Street

Hey Michelle

So did the Zoning Department get a legal opinion? If so who gave the opinion?

David Lundquist

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From: Sharon
Sent: Thursday, November 15, 2018 2:17 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: SAFE INJECTION SITE 446 York Street

RE: SAFE INJECTION SITE PROPOSED @ 446 YORK STREET, LONDON, ONTARIO

There are major concerns for such a site operating at this location.

The location is NOT a safe distance from school properties. Beal alone represents 2,000 students and staff. Many of these students pass by this location regularly.

The location is in a HIGHLY residential neighbourhood. more than 2,000 residents live in adjacent towers, not to mention the single family homes within 30-100 yards.

The location is on an EXTREMELY busy street with more than 20,000 vehicles per day passing by. It is already very dangerous with those going to the Men's Mission constantly walking into traffic. With the thousands expected to use this site just think of the traffic hazards on this busy street.

The location is right in the middle of very successful currently operational businesses which contribute by the way of taxes to the city. By putting this site in the middle of

these businesses it would have very adverse affects on these businesses and their property values.

My own business is a Used Car Lot which I have operated for more than 45 years. My property is practically attached to 446 York Street. I own all of the property behind the proposed site at 446 York Street. There is no rear exit to the 446 York street location and no way to have either a rear or side exit in that building.

The location at 372 York street was rejected for the above reasons. That location is only 2 blocks from 446 York Street. There is revitalization going on in this area of York street so this should also be taken into consideration.

Thank you.

Respectfully submitted,

Dennis Krogman
DENINIS KROGMAN AUTO SALES LTD.

From: David Lundquist
Sent: Wednesday, November 14, 2018 3:56 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: Re: Fw: Upcoming Community Information Meeting - 446 York Street

looked on I have already looked online and do not see any definition for a clinic operating as an SCF.

There's no definition for SCF where is the definition for SCF?

could you kindly point me to the link of the PDF it specifically talks about the SCF?

From: David Lundquist
Sent: Wednesday, November 14, 2018 10:57 AM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: Re: Fw: Upcoming Community Information Meeting - 446 York Street

Hey Michelle,

Where is the definition of a clinic operating as an SCF to be found?

David Lundquist

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From: George Bikas
Sent: Tuesday, November 13, 2018 2:54 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Cc: Carrie O'Brien
Subject: Re: Upcoming Community Information Meeting - 446 York Street

Hello Michelle,

Thank you for providing us via email the notice attached with regard to the upcoming CIM to discuss the ZBA submitted for the above-noted property. Please keep Carrie and I posted moving forward with all notifications via email with regard to this application.

Regards,
George

George Bikas
Manager, Land Development
Drewlo Holdings Inc.
P.O. Box 6000, Komoka, Ontario, N0L 1R0
<http://www.drewloholdings.com/>

Sent: Tuesday, November 13, 2018 1:59 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: Safe Injection Site

RE: Supervised Consumption Facility 446 York St.

I am writing in response to the information that a safe injection site is proposed at 446 York St.

I am against this proposal because it is adjacent to Krogmen Auto Sales who have in the past been subjected to damage to cars, discarded needles, people loitering and undo expense to put up fences on the property to keep undesired individuals off the property. Its bad for business to have the site located next door.

Plus, this site is to close to schools..

I urge the individuals involved with this proposal to search for a different site.

George Meek

From: januszrawski januszrawski
Sent: Monday, November 12, 2018 9:55 AM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: File #8971

File 8971
Margaret Stewart
Michelle Knieriem
703-389 Dundas St
City Hall London, On
London

Date Nov 8,2018

Dear Michelle

I would really appreciate if you would not pass the zoning amendment regarding the property at 446 York Street to allow a Supervised Consumption Facility.

I have great difficulty in addressing this issue , as all the drug users are "self harmers". If a person was "self harming" by another method i.e. wrist slashing you certainly wouldn't open a "Supervised Facility" for this or any kind of self harm, so why single out the drug users? I believe self harm is a mental health issue and a self harmer can be detained until they are not in danger of harming themselves. I also believe the drugs in use in those premises are illegal.

I believe to really to help people a completely new building should be built , to make rehabilitation the best option. I think proper rehabilitation program would make the whole of downtown core a safer place to live. I have been spat upon, sworn at, punched in the stomach, threatened by some users. The area between Elizabeth/Adelaide is a disgrace. Have you ever visited this area and seen users shooting up then living outside. This is not a life for anyone, and allowing people to and encouraging them to use drugs on themselves does them a great injustice. What they really need is rehabilitation and to get back in to society.

Another point I would like to offer is if this goes ahead Drug Users are not encouraged to "loiter" in the building, so they just come and hang out beside our condos. Also I would like to know what a 5 or 10 year projection of the sites are going to look like. I would like a reply.

Yours Truly

Margaret Stewart

From: Kasia Olszewska - Zelinka Priamo Ltd.
Sent: Friday, November 9, 2018 11:47 AM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: RE: Supervised Consumption Facility

Good morning Michelle,

Would you be able to send me the Staff planning report that endorsed 446 York Street and 243 Simcoe Street as potential sites for SCFs, with the planning rationale behind it? I have a copy of the report dated May 14, 2018 (File OZ-8852). The report lists the two addresses as potential sites, however, it does not give an analysis of why these two locations were chosen *in particular?*

Thank you for your help,
Kasia Olszewska, HBA, MPL
Planner
Zelinka Priamo Ltd.

From: Amanda Fonseca
Sent: Thursday, November 8, 2018 6:42 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Cc: Park, Tanya <tpark@london.ca>; Tony Fonseca
Subject: File: Z-8971 - Notice of Planning Application

Hello Michelle,

We received the Notice of Planning Application (File: Z-8971) for 446 York Street in the mail today. Are you able to please send a readable copy of the site concept drawing as several of the words are very blurry, and as our property line touches the property in question, we would like to be able to see and understand all information provided. Also, what do the circles represent/mean?

Thank you,
Amanda & Jose (Tony) Fonseca
342 Burwell Street

From: Megan Walker
Sent: Thursday, November 8, 2018 2:25 PM
To: Knieriem, Michelle <mknieriem@london.ca>
Subject: File: Z8971 re: 446 York Street

Hi Michelle,
We are in receipt of the notice of planning application re: 446 York Street.
The London Abused Women's Centre is fully supportive of the requested zoning as outlined in the notice.
A safe consumption site fits well into the proposed location of 446 York Street and LAWC extends its full support.
Please keep us advised as to the dates and times of future public meetings.

Many thanks,
Megan

Megan Walker
Executive Director
London Abused Women's Centre
797 York Street, Unit 5
London, Ontario N6A 5P9
Canada

From: Kasia Olszewska - Zelinka Priamo Ltd.
Sent: Monday, November 05, 2018 4:49 PM
To: Macbeth, Travis <tmacbeth@london.ca>
Subject: RE: Supervised Consumption Facility

Travis,

I did some research; currently there is an LPAT appeal for 241 Simcoe Street pertaining to Supervised Consumption Facilities, however the LPAT process does not pertain to 446 York Street (the City recommended SCF), which does not include a 'clinic' as a permitted use, therefore notwithstanding the LPAT appeal process, the location would have to go through a complete Zoning By-law Amendment process in order to permit a SCF on site.

Can you provide us with an update regarding the City recommended SCF at 446 York Street?

Thanks,

Kasia Olszewska, HBA, MPL
Planner
Zelinka Priamo Ltd.



November 20, 2018

Via Email: mknieriem@london.ca

Michelle Knieriem, Planner
City of London
206 Dundas Street
London, Ontario N6A 1G7

**Re: Community Information Meeting November 26, 2018
Proposed SCF at 446 York Street**

I am the Lawyer for Northview Apartment REIT. My Client is the owner of a residential apartment building at 340 Colborne Street. We hereby provide written comments on the proposed Zoning By-law Amendment Application for 446 York Street to permit a "clinic" intended to be used for a Supervised Consumption Facility (SCF). We have received Notice that this Application will be the subject of a Community Information Meeting on November 26, 2018.

My Client strongly objects to this site being used as an SCF. My Client's property is in close proximity to the Subject Site, as are a number of other sensitive uses that will suffer significant adverse impacts if the Zoning By-law Amendment is approved. This is not an appropriate location for an SCF.

I have serious concerns with the way in which the City of London is proceeding from a procedural fairness and prematurity standpoint. First, Council pre-determined this Application by "endorsing" this location as being an appropriate site for an SCF at its meeting on May 8, 2018. This pre-determination has rendered the public planning process effectively moot, which is contrary to the legislative scheme of the *Planning Act*.

Second, the City has created policies and definitions to establish SCFs through Official Plan Amendment 680 and Zoning By-law Z.-1-182671. That regime requires that all new sites proposed

150 Dufferin Ave, Suite 206
London ON N6A 5N6

A thick black horizontal bar redacts the signature area of the letter.



for SCFs will require a zoning by-law amendment. OPA 680 and ZBL Z.1-182671 have been appealed to the Local Planning Appeals Tribunal. Those appeals have not yet been determined. Given that the City has established its desired process for new SCFs through the instruments under appeal, it is entirely improper for the City to approve new SCF sites in the interim by re-zoning sites to add a "Clinic" use. This approach is premature, contrary to the public interest, and undermines the new proposed regime.

In addition to these concerns relating to procedural fairness and prematurity, the proposed Zoning By-law Amendment does not constitute sound land use planning, is not consistent with the Provincial Policy Statement, and does not conform to the City's Official Plan.

446 York Street is inappropriate for a supervised consumption site given the proximity of this site to:

1. An active full-time daycare;
2. The YMCA facility, which is used for after-school programs and by families and children;
3. The City's convention centre, which is a prime location for many public events in the City;
4. A law firm;
5. Two major hotels across the street from the block;
6. A secondary school;
7. Over 1500 local residents.

My Client is not opposed to SCFs generally and recognizes that these facilities serve the public interest; however, these facilities must be established in appropriate locations which are compatible with the surrounding neighbourhood and minimize adverse impacts on surrounding properties.

150 Dufferin Ave, Suite 206
London ON N6A 5N6





Thank you for your consideration of this submission.

Yours Truly,
BAROUDI LAW

A handwritten signature in cursive script, appearing to read 'Analee Baroudi', written in black ink.

Analee J.M. Baroudi

150 Dufferin Ave, Suite 206
London ON N6A 5N6

Tel: [REDACTED]
[REDACTED]



"Family Built, Owned and Managed For Over 60 Years"
P.O. BOX 6000, KOMOKA, ON. N0L 1R0

Tel.: [REDACTED]
Fax: [REDACTED]

November 20, 2018

City Clerk's Office
Planning and Environment Committee
City of London
300 Dufferin Avenue
London, Ontario
N6A 4L9

Letter via email only

Attention: Chairman Turner & Members of the Planning and Environment Committee

Re: File: Z-8971; Zoning By-law Amendment - 446 York Street

Dear Chairman Turner & Members of the Planning and Environment Committee:

On behalf of Drewlo Holdings Inc., we are submitting this letter expressing our concern with respect to the above-noted matter. **Drewlo Holdings Inc., as the owner of 433 King Street, strongly opposes the proposed Zoning By-law Amendment.** We feel the zoning change is premature and that the proposed facility is not compatible with surrounding uses.

On January 22, 2018 Planning staff presented a report to PEC regarding the planning of supervised consumption facilities & temporary overdose prevention sites'. Council unanimously passed a motion on January 30, 2018 to establish a new Council Policy. The Policy, entitled 'Siting of Supervised Consumption Facilities (SCF) and Temporary Overdose Prevention Sites (TOPS)' outlines 'criteria' that should be used by proponents planning a SCF or TOPS within the City of London. Additionally, Council directed Staff to initiate the necessary amendments to the Official Plan and Zoning By-law to plan for such facilities.

There are three (3) main criteria noted in the Council approved policy mentioned above; two (2) relating to the location of a proposed facility and the last prescribing Site Design.

As per Council direction, SCF/TOPS should be located to "benefit those who use such facilities" and "to avoid land use conflicts". The Criteria presented are essential for properly locating SCF & TOPS within our community. Unfortunately, the proposed located at 446 York Street fails to address some key components of the location criteria.

Located to Benefit those who use such Facilities

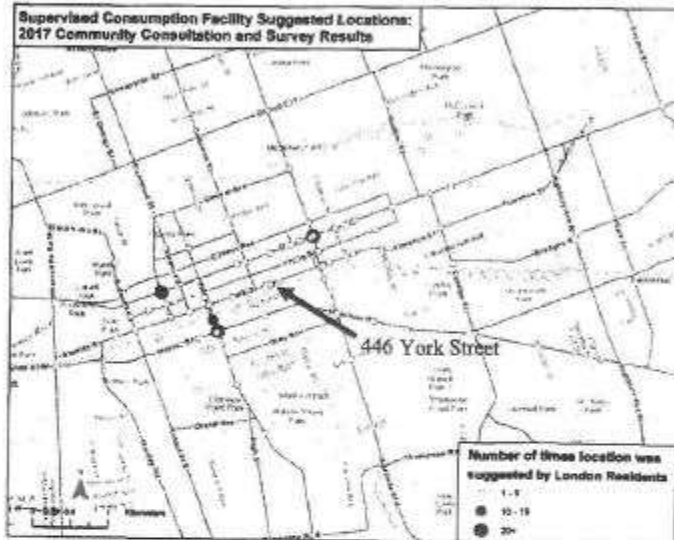
Supervised Consumption Facilities are to be sited in a location that is "within close proximity to, or near, communities where drug consumption is prevalent". While the proposed location at 446 York Street is in proximity to existing drug use, it is outside the top three (3) areas of the City where discarded sharps were most prevalent in 2016-2017. The location was chosen in haste given the availability of the property and does not consider other locations in the City where drug use is more prevalent and a facility would be more accessible to individuals using such facility.



(Figure presented by Dr. Mackie, on behalf of the Middlesex-London Health Unit, to City of London: Planning and Environment Committee on April 30, 2018 <https://www.healthunit.com/opicids>)

The proposed site at 446 York Street is not compliant with the intent of the policy mentioned above. It is within the 'Neighbourhoods Place Type' and the current zoning, RCS2 & RSC4, is intended for moderate intensity commercial uses and trade service uses, and does not permit the 'Clinic' use. It should not be modified to permit SCF/TOPS clinics; these uses should be reserved for properties within the 'Institutional Place Type'.

We believe the rate at Staff is moving to force the approval of this location is inappropriate. It appears that the Middlesex-London Health Unit is jumping at the first available site for the proposed SCF rather than considering all economic and social aspects of the site.



(Figure from the Community Consultation Summary Report <https://www.healthunit.com/opioids>)

In closing, we strongly agree that there is a moral responsibility within the community to help people with addiction problems. But this 'band-aid' approach does not solve the problems presented by the crisis in our community. For the reasons provided, **Drewlo Holdings Inc. strongly opposes the proposed Zoning By-law Amendment at 446 York Street.**

Sincerely,

Allan Drewlo
President, Drewlo Holdings Inc.

Cc: Michelle Knieriem, Planning Services, City of London

RE: 446 YORK ST. File: Z-8971

Nov. 14, 2018

I am disputing the zoning of 446 York St. for a "Supervised Consumption Facility."

Our business is attached to the proposed site. We have an L-shaped property; our backyard is directly behind the building. There is no back exit at 446 York St. The only side exit potential leads immediately into someone's yard and a commercial parking lot.

446 York St. is in the middle of, and within feet of, thriving businesses. It is surrounded by residences and high-rises housing thousands of tax-paying citizens.

York St. is a main artery of the city with incredibly heavy traffic flow. Having no back or side exit makes it dangerous for the people who would be using the facility.

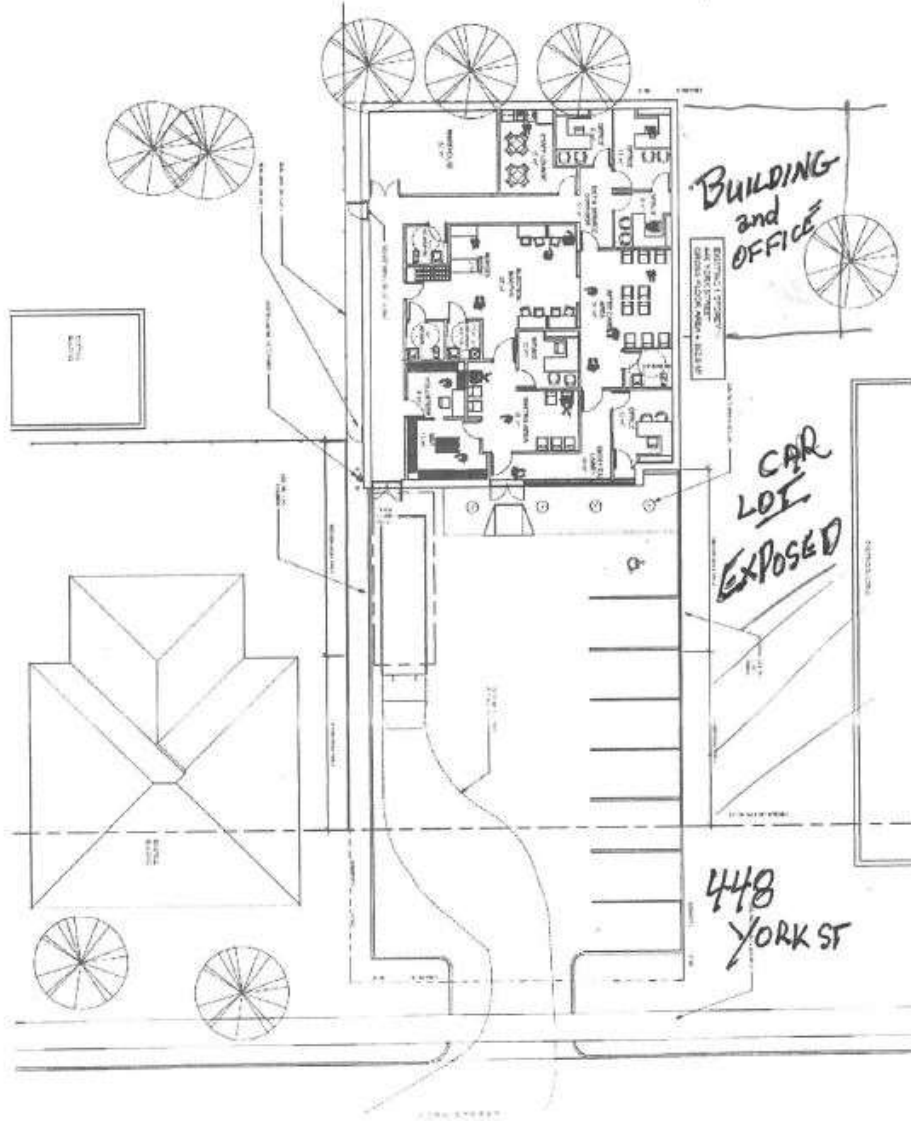
Beal High School's sports field is 50 steps away. A drug consumption site beside our car lot will make it almost impossible for us to function as a business.

My father has owned the property at 448 York St for 45 years. Having had health issues, he would like to sell. The constant flow of afflicted pedestrians will decrease his property value, and leave him vulnerable to loitering and vandalism. After visiting the 'Temporary Site' at 186 King St, I am afraid for my safety, as I often work alone and outside. Please consider this input and find a more sensible location for the intake of illegal drugs. Thank you.

DKrogman Denise Krogman
Krogman Auto Sales Ltd
448 York St. London

Site Concept
For 446 York St

REAR OF CAR
LOT- 448 YORK ST



The above image represents the applicant's proposal as submitted and may change.

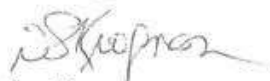

Nov: 2018

When Dr. Mackie assured me that a Drug Consumption Site would not effect our property value, I asked him to please put that in writing. This is what he wrote.

"Your property value probably won't go down..... I'm not a real estate agent, so this is not a professional opinion."

Then handed it back to me smirking

Denise Krugman


448 York St.
London, ON.


Comment Card

Proposed Supervised Consumption Facility



Public Open House
July 25, 2018

Your feedback on the proposed Supervised Consumption Facility at 446 York Street is important to us! Please use this form to provide additional comments.

July 25, 2018

Your property value probably won't
go down.*

Chris
Chris Mackie

* I'm not a real estate
agent, so this is not
a professional opinion.

Thank you for your time!

Your comments would be appreciated by August 8th, 2018. Comments
may also be emailed to scf@mbpc.ca.



Christopher.Mackie@MLHU.on.ca

NOVEMBER 27TH 2018

Michelle Knieriemre
Planning Services
City of London
206 Dundas St
London, Ontario
N7A 1G7

Enclosed please find three articles all from the year 2018 that are pertinent in looking at the application for the Zoning By-Amendment for 446 York Street.

I have tried to highlight the areas that are concerning to us the residents in the neighbourhood.

Thanks for your time.

Respectfully,

A handwritten signature in black ink, appearing to read "Michelle Knieriemre", written in a cursive style.

Agency/Departmental Comments

London Hydro:

This site is presently serviced by London Hydro. Contact Engineering Dept. if a service upgrade is required to facilitate the new building. Any new and/or relocation of existing infrastructure will be at the applicant's expense. Above-grade transformation is required. Note: Transformation lead times are minimum 16 weeks. Contact Engineering Dept. to confirm requirements & availability.

Development Services – Site Plan:

I'm supportive of the site plan provided. No comments.

City Planning – Heritage Planning

To: Michelle Knieriem, Planner II

From: Kyle Gonyou, Heritage Planner

Date: November 5, 2018

Re: Heritage Impact Assessment 446 York Street (Z-8971)

Built Heritage

The subject property at 446 York Street is located adjacent to a heritage listed property at 444 York Street. In conformity to Policy 565_ of *The London Plan*, a Heritage Impact Assessment (MBPC, dated October 2018) was submitted as part of a complete application for a zoning by-law amendment for the subject property.

The Heritage Impact Assessment was prepared using the Ministry of Culture (now Ministry of Tourism, Culture and Sport) *Infosheet #5 Heritage Impact Assessments and Conservation Plans*. The Heritage Impact Assessment sufficiently described the heritage listed property at 444 York Street, and provided sufficient reference to applicable policy and legislation.

The Heritage Impact Assessment found that the proposed reuse of the existing building at 446 York Street “is anticipated to have no impact on the historical character and attributes of 444 York Street” (page 12). This is primarily attributed to the minimal alterations to the exterior of the building at 446 York Street required to facilitate the proposed reuse of the existing building.

Staff concur with the general findings of this Heritage Impact Assessment that the proposed reuse of the existing building at 446 York Street will result in no adverse impacts to the adjacent heritage listed property at 444 York Street.

Archaeology

The subject property at 446 York Street is identified as having archaeological potential by *the Archaeological Management Plan*. However, the proposed reuse of the existing building is not reasonably anticipated to require ground disturbing alterations that would trigger the requirement for an archaeological assessment to be completed. In this instance, the application of the h-18 holding provision may be more appropriate. The application of the h-18 holding provision would ensure that archaeological concerns are addressed if the subject property undergoes future redevelopment or change. The alterations noted on the Site Plan [provided separately, dated October 24, 2018] (fence, painting new lines on the paved parking area, and concrete bollards) are not anticipated to adversely affect any archaeological potential that may remain at the property.

Appendix C – Policy Context

The following policy and regulatory documents were considered in their entirety as part of the evaluation of this requested land use change. The most relevant policies, by-laws, and legislation are identified as follows:

Provincial Policy Statement:

1.1.1 Healthy, liveable and safe communities are sustained by:

b) accommodating an appropriate range and mix of residential (including second units, affordable housing and housing for older persons), employment (including industrial and

commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;
c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;

Policy 4.7: The official plan is the most important vehicle for implementation of this Provincial Policy Statement. Comprehensive, integrated and long-term planning is best achieved through official plans.

Official plans shall identify provincial interests and set out appropriate land use designations and policies. To determine the significance of some natural heritage features and other resources, evaluation may be required.

The London Plan:

Policy 917: Our neighbourhoods make up the vast majority of our City Structure's land area. Our city is the composite of the neighbourhoods that define where we live, work, and play and also defines our city's identity. Each of our neighbourhoods provides a different character and function, giving Londoners abundant choice of affordability, mix, urban vs. suburban character, and access to different employment areas, mobility opportunities, and lifestyles.

Official Plan Amendment 679:

Supervised Consumption Facilities and Temporary Overdose Prevention Sites
> General Policy Approach

1099_a Supervised consumption facilities and temporary overdose prevention sites will be planned such that they:

- meet the needs of those who they are designed to serve
- avoid land use conflicts

Supervised consumption facilities and temporary overdose prevention sites may be permitted within any Place Type, subject to a zoning by-law amendment and all of the policies of this Plan.

> Evaluation Criteria for Locating Supervised Consumption Facilities and Temporary Overdose Prevention Sites

1099_b The following evaluation criteria will be used when considering applications for zoning by-law amendments to support supervised consumption facilities and temporary overdose prevention sites to ensure that they are appropriately located:

1. Locations that meet the needs of those who they are designed to serve
 - a. Within close proximity to, or near, communities where drug consumption is prevalent
 - b. Well serviced by transit
 - c. Discrete, allowing for reasonable privacy for those using the facility
 - d. Separated from busy pedestrian-oriented commercial areas
 - e. Separated from public spaces that generate pedestrian traffic or may generate large crowds from time to time
 - f. Close to an area with other drug addiction related support services
2. Locations that avoid land use conflicts
 - a. Separated from busy commercial areas or active public spaces that could generate conflicts between the general public and those leaving supervised consumption facilities after consuming
 - b. Separated from parks
 - c. Separated from key pedestrian corridors
 - d. Separated from elementary or secondary school properties
 - e. Separated from municipal pools, arenas and community centres and the Western Fairgrounds
 - f. Not located within the interior of a residential neighbourhood

> Site and Facility Design Requirements for Supervised Consumption Facilities and Temporary Overdose Prevention Sites

1099_c Supervised consumption facilities and temporary overdose prevention sites should be designed to:

- a. Incorporate the Crime Prevention Through Environmental Design (CPTED) principles of natural surveillance, natural access control and natural territorial reinforcement
- b. Meet provincial regulations, the policies of this plan, and municipal by-laws relating to accessibility
- c. Orient building entrances to allow for discrete entry and exit while ensuring visual surveillance and safety
- d. Allow for easy visual surveillance of the facility and its surrounding site from the street
- e. Avoid opportunities for loitering, such as the installation of seating areas or landscape features that can be used for seating
- f. Ensure that interior waiting areas and vestibules of the facility are adequately sized to avoid line-ups or waiting outside of the building
- g. Through the Zoning By-law amendment process, establish a minimum intake and waiting area per consumption booth, and a minimum post-consumption area per consumption booth to be established in the Zoning By-law.

> Neighbourhood Consultation for Supervised Consumption Facilities and Temporary Overdose Prevention Sites

1099_d Consultation is required by the Federal government in order to gain approval for the operation of supervised consumption facilities.

In addition to this requirement, proponents of supervised consumption facilities and temporary overdose prevention sites must host a community meeting with property owners, business owners, and residents within a minimum of 250m of the proposed site to describe the proposal and operational management plans for the facility. The community meeting must be held in advance of submitting an application for a Zoning By-law amendment to permit a Supervised Consumption Facility.

Proponents are required to document the information received and identify how their proposal responds to the comments identified at the community meeting. This document shall be required as part of a complete application for a Zoning By-law amendment to permit a Supervised Consumption Facility or Temporary Overdose Prevention Site.

To ensure that an ongoing consultation occurs after a Supervised Consumption Facility or Temporary Overdose Prevention Site is approved, the proposal for a Supervised Consumption Facility or Temporary Overdose Prevention Site shall also include a consultation plan for regular engagement with the surrounding community. Such a consultation plan shall include at least one community meeting per year and the identification of a primary contact at the facility able to address neighbourhood concerns regarding the ongoing operation of the facility.

> Conceptual Site Plan for Supervised Consumption Facilities and Temporary Overdose Prevention Sites

1099_e The submission of a conceptual site plan as part of the complete application for a Zoning By-law Amendment to permit a Supervised Consumption Facility or Temporary Overdose Prevention Site will be required. The purpose of the conceptual site plan is to indicate how the site design criteria have been addressed and to allow the public the opportunity to comment on site plan matters during consideration of the proposed Zoning By-law Amendment to permit a Supervised Consumption Facility or Temporary Overdose Prevention Site use. The proposed design and conceptual site plan will be provided to the site plan approval authority along with comments received regarding the design. Where site plan approval is not required, the proposed design along with comments received

regarding the design will be forwarded to the relevant Federal or Provincial ministry considering the application for a Supervised Consumption Facility or Temporary Overdose Prevention Site.

1989 Official Plan

Policy 5.1.3: Office/Residential Objectives

- i) Promote office/residential projects, in areas adjacent to the Downtown, which will serve as a buffer between more intense commercial development and nearby residential neighbourhoods.
- ii) Accommodate office development at a limited scale in areas adjacent to the Downtown.
- iii) Maintain a continuity of pedestrian-oriented uses at street level through the development of office uses on the lower levels of office/residential buildings.

Policy 5.3.1: Permitted Uses

The main permitted uses in the Office/Residential designation shall be offices and residential uses within mixed-use buildings or complexes; apartments; small scale stand alone offices and office conversions. Secondary uses which may be permitted as an accessory use include personal services; financial institutions; convenience stores; day care centres; pharmacies; laboratories; clinics; studios; and emergency care establishments. In addition, eat-in restaurants may be permitted through an amendment to the Zoning By-Law, subject to the Planning Impact Analysis as described in Section 5.4., to determine, among other things, whether the use can be integrated with minimal impact on surrounding areas. The Zoning By-law may restrict the range of uses permitted on individual sites, and will regulate the size of eat-in restaurants and other secondary uses.

Official Plan Amendment 680 (under appeal):

6.5 Supervised Consumption Facilities and Temporary Overdoes Prevention Sites

6.5.1 Definitions

A supervised consumption facility is a facility that has received an exemption from the *Controlled Drugs and Substances Act*, where people can bring their illicit drugs to consume in a sterile and safe environment. These facilities have equipment and trained staff present to oversee a person's drug consumption and assist in the event of an overdose or other health risk. These facilities shall offer additional health and drug-related support services. These facilities are intended to provide such services on an ongoing, rather than temporary, basis.

A temporary overdose prevention sites is a temporary facility that has received an exemption from the *Controlled Drugs and Substances Act* in the case of a Provincially declared public health emergency, where people can bring their illicit drugs to consume in a sterile and safe environment. Unlike supervised consumption facilities, these are to be temporary in nature.

6.5.2 General Policy Approach

Supervised consumption facilities and temporary overdose prevention sites will be planned such that they:

- meet the needs of those who they are designed to serve
- avoid land use conflicts

Supervised consumption facilities and temporary overdose prevention sites may be permitted within any land use designation, subject to a zoning by-law amendment and all of the policies of this Plan.

6.5.3 Evaluation Criteria for Supervised Consumption Facilities and Temporary Overdose Prevention Sites

The following evaluation criteria will be used when considering applications for zoning by-law amendments to support supervised consumption facilities and temporary overdose prevention sites to ensure that they are appropriately located:

1. Locations that meet the needs of those who they are designed to serve
 - i. Within close proximity to, or near, communities where drug consumption is

prevalent

- ii. Well serviced by transit
- iii. Discrete, allowing for reasonable privacy for those using the facility
- iv. Separated from busy pedestrian-oriented commercial areas
- v. Separated from public spaces that generate pedestrian traffic or may generate large crowds from time to time
- vi. Close to an area with other drug addiction related support services

2. Locations that avoid land use conflicts

- i. Separated from busy commercial areas or active public spaces that could generate conflicts between the general public and those leaving supervised consumption facilities after consuming
- ii. Separated from parks
- iii. Separated from key pedestrian corridors
- iv. Separated from elementary or secondary school properties
- v. Separated from municipal pools, arenas and community centres and the Western Fairgrounds
- vi. Not located within the interior of a residential neighbourhood

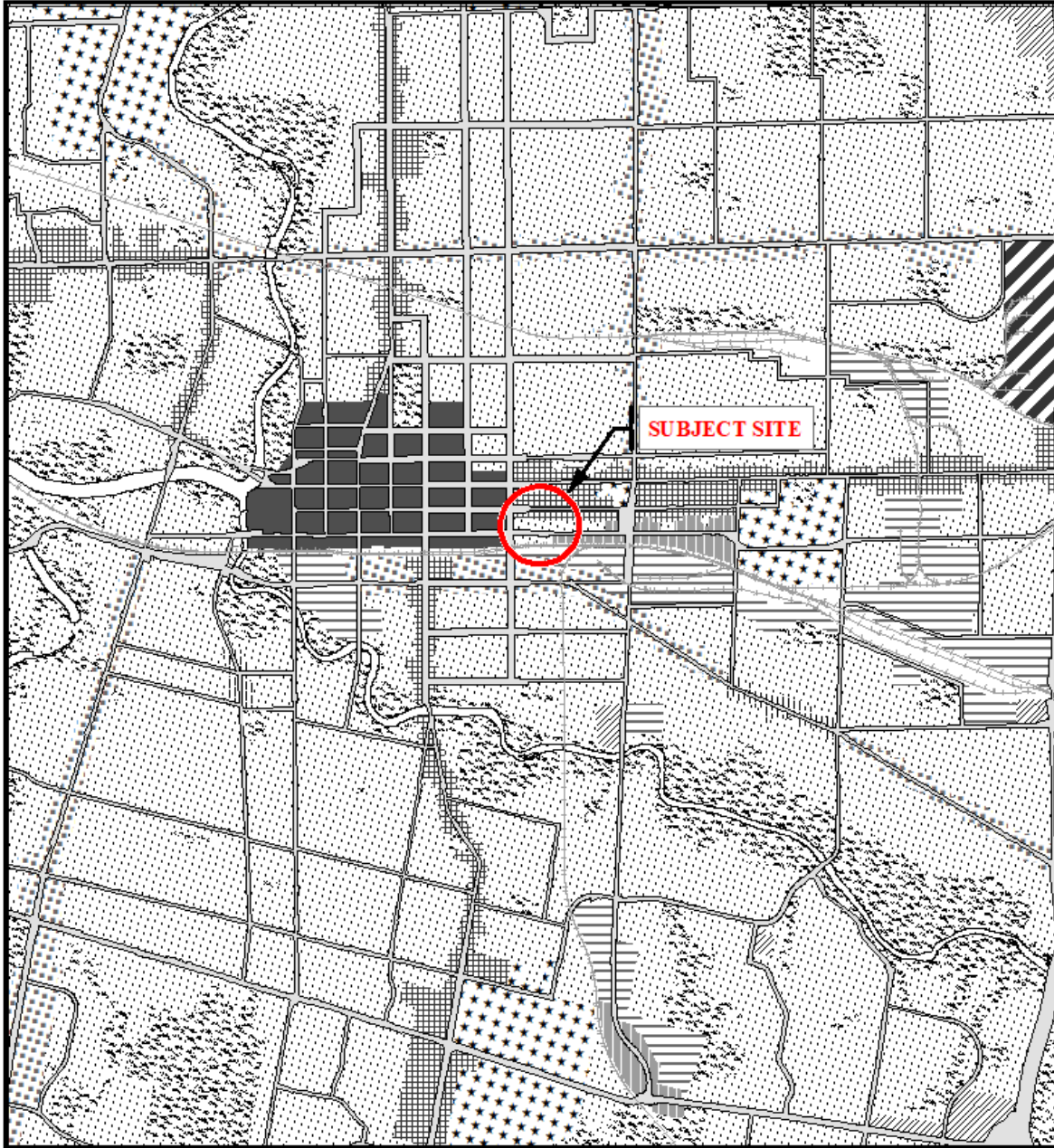
Zoning By-law Z-1

Bill 254-2018 (under appeal):

Section Number 2 - Definitions is amended by adding the following new definitions in the appropriate alphabetical location:

“Supervised Consumption Facility” means a facility that has received an exemption from the *Controlled Drugs and Substances Act*, where people can bring their illicit drugs to consume in a sterile and safe environment. These facilities have equipment and trained staff present to oversee a person’s drug consumption and assist in the event of an overdose or other health risk. These facilities shall offer additional health and counselling related support services. These facilities are intended to provide such services on an ongoing, rather than temporary, basis.”

Additional Maps



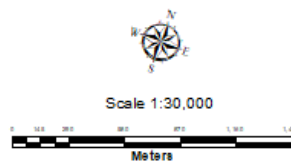
Legend

- | | | |
|------------------------|--------------------------|---|
| Downtown | Future Community Growth | Environmental Review |
| Transit Village | Heavy Industrial | Farmland |
| Shopping Area | Light Industrial | Rural Neighbourhood |
| Rapid Transit Corridor | Future Industrial Growth | Waste Management Resource Recovery Area |
| Urban Corridor | Commercial Industrial | Urban Growth Boundary |
| Main Street | Institutional | |
| Neighbourhood | Green Space | |

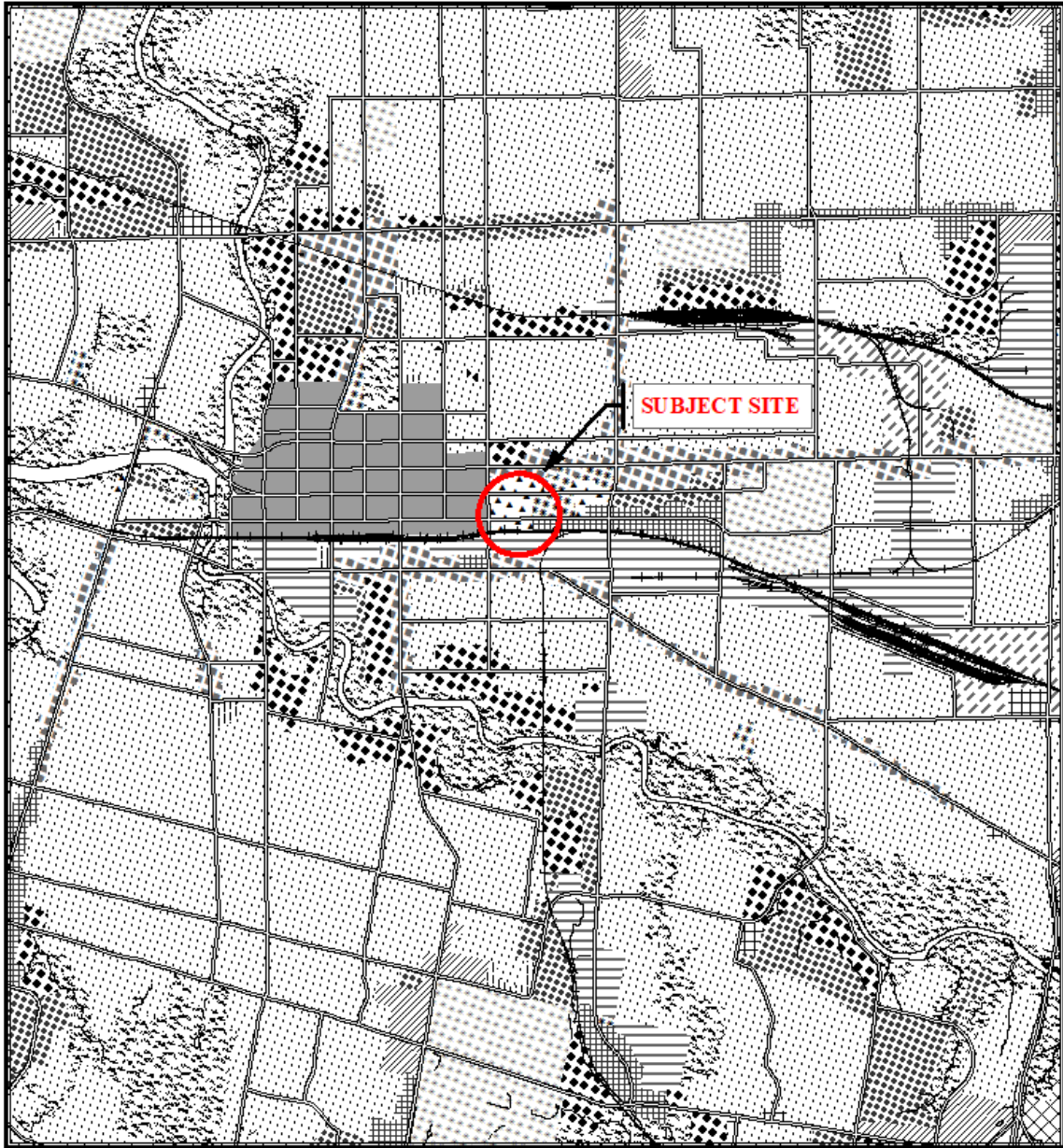
This is an excerpt from the Planning Division's working consolidation of Map 1 - Place Types of the London Plan, with added notations.

At the time of the printing of this map, the Rapid Transit EA is in progress. This map shows the Rapid Transit Corridors and Urban Corridors to recognize potential alignments. These Place Types will be modified to align with the results of the EA process for the final version of The London Plan.

CITY OF LONDON
 Planning Services /
 Development Services
LONDON PLAN MAP 1
- PLACE TYPES -
 PREPARED BY: Planning Services

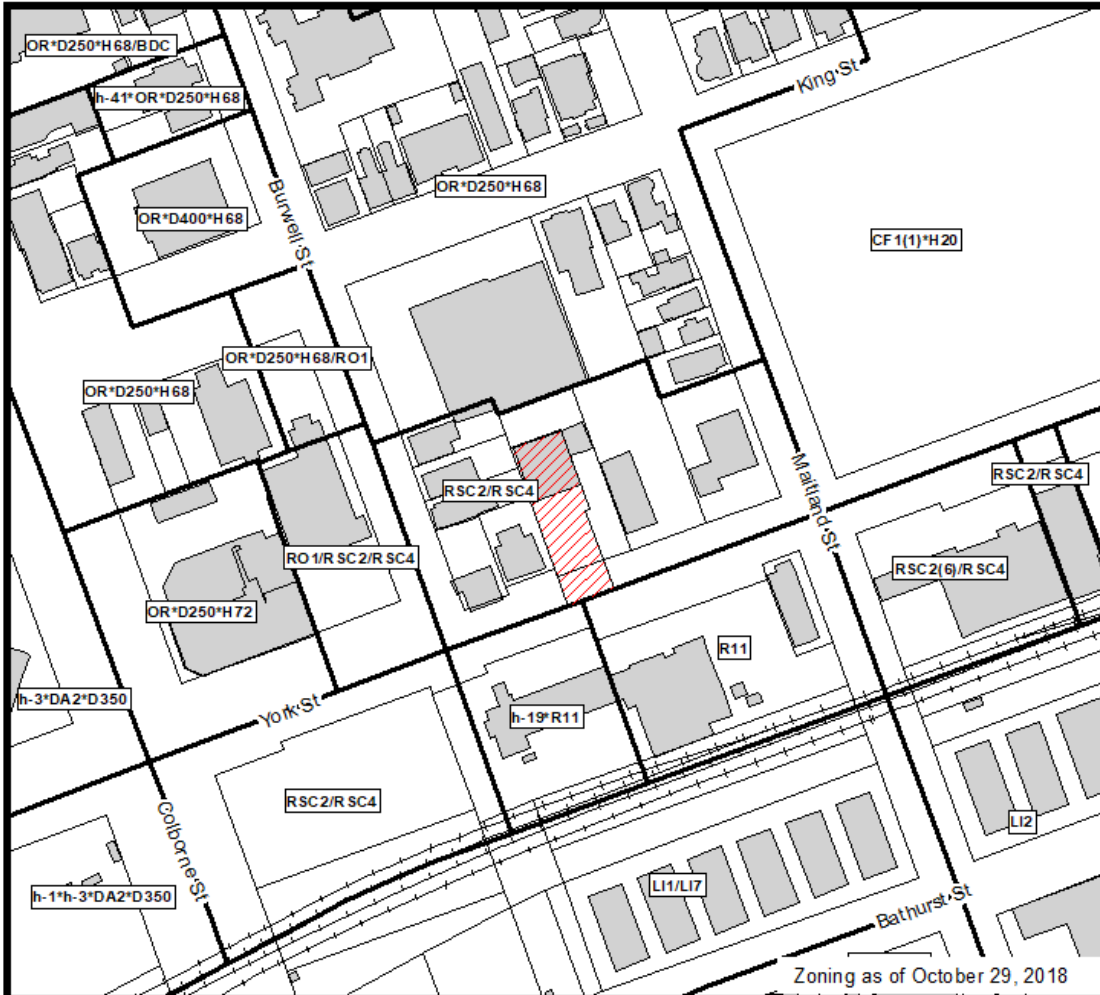


File Number: Z-8971
Planner: MK
Technician: MB
Date: November 14, 2018



| Legend | | |
|---|--|-------------------------|
| Downtown | Multi-Family, Medium Density Residential | Office Business Park |
| Wonderland Road Community Enterprise Corridor | Low Density Residential | General Industrial |
| Enclosed Regional Commercial Node | Office Area | Light Industrial |
| New Format Regional Commercial Node | Office/Residential | Commercial Industrial |
| Community Commercial Node | Regional Facility | Transitional Industrial |
| Neighbourhood Commercial Node | Community Facility | Rural Settlement |
| Main Street Commercial Corridor | Open Space | Environmental Review |
| Auto-Oriented Commercial Corridor | Urban Reserve - Community Growth | Agriculture |
| Multi-Family, High Density Residential | Urban Reserve - Industrial Growth | Urban Growth Boundary |

| | | |
|---|---|---|
| <p>CITY OF LONDON Planning Services / Development Services OFFICIAL PLAN SCHEDULE A - LANDUSE -</p> <p><small>PREPARED BY: Graphics and Information Services</small></p> | <p style="text-align: center;"> Scale 1:30,000 Meters </p> | <p>FILE NUMBER: Z-8971 PLANNER: MK TECHNICIAN: MB DATE: 2018/11/14</p> |
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COUNCIL APPROVED ZONING FOR THE SUBJECT SITE: RSC2/RSC4

1) **LEGEND FOR ZONING BY-LAW Z-1**

- | | |
|--|---|
| <ul style="list-style-type: none"> R1 - SINGLE DETACHED DWELLINGS R2 - SINGLE AND TWO UNIT DWELLINGS R3 - SINGLE TO FOUR UNIT DWELLINGS R4 - STREET TOWNHOUSE R5 - CLUSTER TOWNHOUSE R6 - CLUSTER HOUSING ALL FORMS R7 - SENIOR'S HOUSING R8 - MEDIUM DENSITY/LOW RISE APTS. R9 - MEDIUM TO HIGH DENSITY APTS. R10 - HIGH DENSITY APARTMENTS R11 - LODGING HOUSE DA - DOWNTOWN AREA RSA - REGIONAL SHOPPING AREA CSA - COMMUNITY SHOPPING AREA NSA - NEIGHBOURHOOD SHOPPING AREA BDC - BUSINESS DISTRICT COMMERCIAL AC - ARTERIAL COMMERCIAL HS - HIGHWAY SERVICE COMMERCIAL RSC - RESTRICTED SERVICE COMMERCIAL CC - CONVENIENCE COMMERCIAL SS - AUTOMOBILE SERVICE STATION ASA - ASSOCIATED SHOPPING AREA COMMERCIAL OR - OFFICE/RESIDENTIAL OC - OFFICE CONVERSION RO - RESTRICTED OFFICE OF - OFFICE | <ul style="list-style-type: none"> RF - REGIONAL FACILITY CF - COMMUNITY FACILITY NF - NEIGHBOURHOOD FACILITY HER - HERITAGE DC - DAY CARE OS - OPEN SPACE CR - COMMERCIAL RECREATION ER - ENVIRONMENTAL REVIEW OB - OFFICE BUSINESS PARK LI - LIGHT INDUSTRIAL GI - GENERAL INDUSTRIAL HI - HEAVY INDUSTRIAL EX - RESOURCE EXTRACTIVE UR - URBAN RESERVE AG - AGRICULTURAL AGC - AGRICULTURAL COMMERCIAL RRC - RURAL SETTLEMENT COMMERCIAL TGS - TEMPORARY GARDEN SUITE RT - RAIL TRANSPORTATION "h" - HOLDING SYMBOL "D" - DENSITY SYMBOL "H" - HEIGHT SYMBOL "B" - BONUS SYMBOL "T" - TEMPORARY USE SYMBOL |
|--|---|

CITY OF LONDON

PLANNING SERVICES / DEVELOPMENT SERVICES

**ZONING
 BY-LAW NO. Z-1
 SCHEDULE A**



THIS MAP IS AN UNOFFICIAL EXTRACT FROM THE ZONING BY-LAW WITH ADDED NOTATIONS

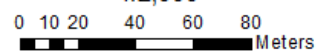
FILE NO:

Z-8971 MK

MAP PREPARED:

2018/11/14 MB

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Additional Reports

Province of Ontario. Consumption and Treatment Services: Application Guide (October, 2018)

May 14, 2018 Report to the Planning and Environment Committee – Planning for Supervised Consumption Facilities and Temporary Overdose Prevention Sites (OZ-8852)

January 22, 2018 Report to the Planning and Environment Committee – Planning for Supervised Consumption Facilities and Temporary Overdose Prevention Sites (OZ-8852)