

To: Eric Lalande, Planner
Planning and Development
City of London
204 / 206 Dundas Street
London, ON
N6A 1H3
sent via email

RE: PROPOSED APPLICATION FOR METHADONE CLINIC AT 527 WELLINGTON ROAD SOUTH IN LONDON

I acknowledge that there is a growing need for Methadone Clinics and Pharmacies to be located throughout the city to increase the accessibility of those individuals who require this service. However, I do have concerns regarding the proposed location of 527 Wellington Road South in London as a suitable site. Of course, as a resident since mid-1990s in the 35 Waterman Ave. complex, I have the usual and expected concerns, many of which are applicable to myself as a resident, to businesses in the immediate vicinity and my neighbours. Some of these concerns are:

- residential and public school proximity to proposed clinic knowing that it is within the 300 m direct connection limit of specified use buildings/properties. I am aware there are zoning by-laws in place and amended only a few months prior to this application
- children reside and play in the 35 Waterman Ave. Complex, some in less than 20 m from the proposed site
- increase in crime activity via drug sales / weapon offences or assault / physical altercations, property damage, theft and devaluation
- increase in garbage on area properties
- loitering by clients at proposed site and on neighbouring residential and commercial businesses
- interactions between clients and local residents and staff of local businesses
- lack of suitable parking at this site

I have gathered my information from the following sources:

- the application package submitted by Stephen Cromwell, MCIP, RPP of Zelinka Priamo Ltd.
- Planning for Methadone Clinics and Methadone Pharmacies – Research Study and Proposed Policies and Regulations prepared by the City of London – Planning Division in February 2012
- City of London – bylaw amendments passed on March 20, 2012
- personal knowledge of the property as I have been a resident in the 35 Waterman Ave complex since 1996

I have some made some points to consider by city staff as they go through the process of the application. Please consider the following criteria when deliberating this application.

In accordance with the service delivery model to control loitering, wait times and peak volumes, is there a limit on the maximum number of clients that this site can suitably treat? If so, would that maximum number be implemented and by whom?

The Zelinka Priamo report suggests that clients will arrive on the southbound Wellington Road bus as indicated by the reference to a bus stop located just north of 527 Wellington BUT please consider the following:

- In order to get to the north bound Wellington bus, there are other options. These are to walk to either Wellington and Commissioners Roads or walk to Wellington and Wilkins Roads and use the traffic lights to cross Wellington Road safely. In order for a person to catch a northbound Wellington bus, there are two bus stops on the east side of Wellington between Commissioners and Wilkins which does make them closer to 527 Wellington Road site, however to access them, the person must cross 6 lanes of traffic on Wellington. This is dangerous even at non-peak hours of the day. It is my opinion that there is an extremely high potential for a dramatic increase in pedestrian and vehicle accidents on Wellington Road should this application be approved.
- There is no mention of persons using the Richmond St bus route and walking a portion of the way.
- There is no mention of persons using the Oxford bus route. Those persons travelling northbound on the Oxford route will be aware that it travels through the subdivision and down Chiddington Ave and stops in the immediate vicinity of George Cartier Public School. Chances are higher that some of these bus riders are the most likely to find out about the “obscure” walkway. In fact, this is how I found out about the walkway. For those persons who travel on the southbound Oxford route, I am confident that they would have either gotten off the bus and opted for another route to get them closer and are highly unlikely to find out about the walkway.

I question the amount of available parking spots as the proposed number is: 21 spots and 5 bike.

Please consider how many parking spots will be required by staff and how many will be available to clients. According to my calculations, a spot will be needed for a Doctor, pharmacist, nurse(s), technician(s), security staff (s), reception staff (s) and any others required by the Methadone Clinic and Pharmacy. Would/should there be a designated delivery parking spot?

How many spots must be required by law to be reserved as Accessibility/Handicap parking spots? Keep in mind that the spot where the small ramp is located at the building entrance MUST be left open and accessible for those individuals requiring it to access the building.

How many are now left for the use of the clients? Also, keep in mind that 5 spots are allocated for bikes.

In my opinion, the parking needs for clients will fall drastically of short of the available spots. If this application is approved, there will

be illegal parking in local business parking lots and driveways as well as in the 35 Waterman Ave. Complex. I should note that at the Oct. 18, 2012 Information Session held at 527 Wellington Road, the high number of vehicles that were illegally parked, considering that the residents in the 35 Waterman Ave complex had walked to the session. Had city staff / councillors / newspaper staff / the client or his agent noted this as well?

Also the building is too large to meet the current zoning bylaws for parking so a portion of it (1200 sq ft) will be walled off and not used. If this application is approved, could a minor variance be applied for in the future to open up this unused section, knowing that current parking criteria will not be met. It is my opinion that only a permanent, brick wall could solve this matter.

Currently, each local business / strip plaza plows their lot and piles the snow on their property. If this is to be done at the 527 Wellington Road site, how many parking spaces will be lost due to snow storage in the winter months? In order to meet the criteria for parking, snow will need to be plowed and removed by truck to an off-site location, thus incurring additional costs for the Methadone Clinic and Pharmacy.

There is a short driveway / area between plaza containing Sherwin Williams Paints (515 Wellington) and 527 Wellington Road and it is **NOT** plowed by anyone. The snow frequently is very soft and deep in this area and cars often get stuck. Occasionally a snow plow operator may clean this area if many vehicles are getting stuck. When snow piles up in this area, access onto Wellington Road is often restricted to a very small area (possibly 2 tight lanes wide), making it extremely difficult to get on / off of Wellington Road.

This driveway is used not only as secondary entrance to 35 Waterman complex by residents but it is also used by the emergency services personnel and commercial delivery vehicles to access the complex. It is not marked with signage as a fire route but I feel that it should be as there are no parking spaces on the north side of building at 527 Wellington.

The proposed business service area of the building will cover 63 m². I assume that this will contain hot water heater, furnace, electrical service panel and garbage / storage area. Does it also include a secure area for drug storage and money storage? Does it also include staff washrooms and lunchroom?

How many washrooms will be available for client use?

There are many blank spots on the application submitted for this zoning change. I don't mean to "knit-pick" or offend anyone but through my work in an accredited laboratory, I am well aware of the mandatory, complete and correct documentation of any document that is legal or has the potential to be legal. Does this application need to have the "blanks" completed or is this acceptable in its present form?

Some of my concerns regarding the application are as follows:

- The date that the application was stamped "received" by staff was manually changed but not initialled by the person who made this change.
- In question # 1, there is missing contact information for the owner, the applicant and the agent in each section. Some of the provided information is extremely vague (name and email only)
- In question # 2, the date of the submission is blank. There is a covering letter by Zelinka Priamo Ltd., which references the application and its submission date but the letter could easily be separated from the application, hence leaving the submission date "blank" on the application.
- In question # 3, the contact info for holders of any mortgages, charges or other encumbrances in respect of the subject land is blank. If there are none, than NONE should be stated.
- In question # 5, it is answered as NO but I feel that it should have been answered as YES. I am unable to comment about the balance of the application as it is unfamiliar to me.

As you can see, many of the concerns listed above address issues in many categories. I also have concerns about the amount of methadone stored on site and the frequency of deliveries. I am also concerned about the amount of money stored on site. Please consider the opinions / points that I have expressed as the City of London staff consider the application for a proposed Methadone Clinic and Pharmacy to be located at 527 Wellington Road in London. It is my opinion that for so many reasons, this site is not suitable.

Hopefully, more information will be presented about this matter at the Public Participation Meeting at Centennial Hall on Feb. 19, 2013.

Respectfully,
Teresa Couture
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