

## Report to Community and Protective Services Committee

**To:** Chair and Members  
Community and Protective Services Committee  
**From:** Scott Mathers, MPA, P. Eng., Deputy City Manager,  
Planning and Economic Development  
**Subject:** Adult Entertainment Body-rub Parlour - Relocation Request - (from 802  
Exeter Road to 232 Dundas Street) - Public Participation Meeting  
**Date:** August 23, 2022

## Recommendation

That, on the recommendation of the Managing Director, Planning and Economic Development and Deputy City Manager, in response to an application made under the Business Licensing By-law L.-131-16 (the By-law) to substitute an existing Adult Entertainment Body-rub Parlour at 802 Exeter Road for a proposed new location at 232 Dundas Street, the submission from the Licence Manager **BE RECEIVED** noting that City Council shall make the final decision whether or not to amend the Licensing By-law to permit the substitution.

## Summary

Staff have received a request to amend the Business Licensing By-law Schedule 2A to substitute an existing Adult Entertainment Body-rub Parlour at 802 Exeter Road for a new location at 232 Dundas Street. Council may consider applications for substitution once several criteria have been met, including at least one public meeting at Community and Protective Services Committee (CPSC).

This report compiles the materials required by the By-law for consideration of the substitution request by CPSC and Council. The report also includes the comments and recommendations received in response to the notice of Application, and some additional information considered necessary by the License Manager regarding locating adult entertainment parlours.

## 1.0 Application Requirements

### 1.1 Substitution Requests

The Business Licensing By-law L-131-16 (Schedule 2, Part 9) provides that Council may consider applications to substitute a new location for an existing location of an Adult Entertainment Body-rub Parlour. The Licence Manager shall circulate the application and submit comments to the Community and Protective Services Committee. Council shall make the final decision on whether to amend the By-law to remove the existing location and approve the new requested location.

The Licensing office received much of the necessary application material to consider an application to relocate the existing Adult Entertainment Body-rub Parlour from 802 Exeter Road to the new location at 232 Dundas Street on February 4<sup>th</sup>, 2022. The Exeter Road location has been licensed since 2018 as an “*Adult Entertainment Body-rub Parlour*”.

### 1.2 Location Requirements

Schedule 2, Section 9.0 of the Business Licensing By-law provides location requirements for Council’s consideration of the substitution of a new Adult Entertainment Body-rub Parlour:

*9.2 (1) (a) An Adult Entertainment Body-rub Parlour shall not be located on lands according to the City of London’s Zoning By-law Z-1 or any successor by-law which are*

*exclusively zoned Residential, or lands zoned Residential in combination with a compound zone;*

*9.2 (1) (b) An Adult Entertainment Body-rub Parlour shall not be located within 100 metres of lands according to the City of London's Zoning By-law Z-1 or any successor by-law which are exclusively zoned Residential, or lands zoned Residential in combination with a compound zone;*

*9.2 (1) (c) An Adult Entertainment Body-rub Parlour shall not be located within 100 metres of the premises of a school, a day-care centre or a place of worship, existing on the date of the request for an amendment to Schedule 3A of this By-law;*

The proposed location at 232 Dundas Street complies with these locational criteria, as confirmed by City of London Planning Staff on March 10, 2022, using the separation distance outlined in Schedule 2, Section 9.2 (2) of the Licensing By-law.

### **1.3 Fully Completed Application**

Section 9.3 states that any request under section 9.1 shall be made to the Licence Manager and shall be accompanied by a fully completed application for the issuance of an Adult Entertainment Body-rub Parlour Owner licence.

At the time of writing this report, the Licence Manager is satisfied that the application can be considered "fully completed" for the purposes of consideration of the substitution request.

### **1.4 Circulation for Public Comment**

Section 9.4 indicates that the Licence Manager shall give notice by personal service or prepaid first-class mail to every owner of land within 120 meters of the proposed new location who may submit comments and recommendations to the Licence Manager in respect of the request within such time, which shall be within thirty (30) days of the notice by the Licence Manager of the request, as the Licence Manager may specify in the notice.

Notice of the substitution/relocation request was mailed to all landowners within 120m of the proposed new location on April 4<sup>th</sup>, 2022, indicating that comments were to be received by May 3, 2022: 30 days following mailout.

A copy of the notice is attached hereto as **Appendix 'B'**.

### **1.5 Comments & Additional Information**

The comments and recommendations received by the Licence Manager in response to the notice described above, together with any additional information that the Licence Manager considers necessary, shall be submitted to the Community and Protective Services Committee as per Section 9.5.

### **SUMMARY OF PUBLIC COMMENTS:**

There were fifteen (15) comments received from the public regarding the Notice of Application, which was mailed to 100 addresses/recipients within 120m of the proposed location. A large "Notice of Application" poster was also affixed to the exterior of 232 Dundas Street, to notify passersby. Twelve responses were received by email, and three by letter. The email responses are summarized as follows:

- This business does not make sense in newly developed tourist area
- Passers-by will feel unsafe and "weird"
- After years of work the quality of residential and commercial tenants finally improving.

- Application does not support the creation of a family friendly, diverse area, which was the plan.
- Goes against everything the city has been trying to accomplish with the revitalization of Dundas place
- Counter-intuitive to work that has been done Downtown
- Should be located on outskirts of town
- Two-thirds of all sex-trafficking in Canada originates in Ontario and London is a hub for sex trafficking because it is the first large city located between Detroit/Windsor and Toronto with easy access from the 401 into hotels and motels.
- Demand for paid sexual services fuels the growth of trafficking and exploitation of our most vulnerable populations. Approving this application for relocation would be a mistake.
- Deny the application and revoke the existing Licence.

The full email comments, and the three letters received, are included in **Appendix 'C'**.

The Notice of Application was also circulated to 15 internal and partner agencies, including the Ward Councillor, Downtown London, Fire Services, Police Services, the Middlesex London Health Unit, Tourism London, London Housing Division, Planning Division, and others. No formal comments were received from any internal agencies. Downtown London also sent out a survey to their members, summarized below.

## **DOWNTOWN LONDON SURVEY**

Following receipt of the Notice of Application, Downtown London ran a member survey to get feedback regarding this application. 122 people were sent the survey, 59 people opened the email, and 19 responses were received. There was one question, and one open comment section:

*Question: What is my position on this matter?*  
 84% (16) not in favour of this application  
 15% (3) neutral on the application  
 0% in favour

*Comment: "Please feel free to explain how this matter will positively or negatively affect your business."*

The Downtown London survey results and subsequent comments, are attached as Attachment 4 in **Appendix "C"**

## **ADDITIONAL COMMENTS**

### **London Police Services re. Existing Location:**

London Police received eleven (11) "Calls for Service" to the existing Adult Entertainment Body-rub Parlour location at 802 Exeter Road over the last 5 years. The call types are summarized as "Trouble with Person", "Property Damage", "Suspicious Person" and "Weapons" investigations.

### **1.6 Public Meeting**

The requirement expressed in Section 9.6 of the By-law, stating that "Before an amendment to Schedule 2A of this By-law is passed, the Community and Protective Services Committee shall hold at least one meeting that is open to the public for the purpose of affording an opportunity to the requester and any other person who attends the meeting to make submissions in respect of the request", shall be satisfied by the August 23<sup>rd</sup> meeting for which this report has been prepared.

## 2.0 Additional Information

### 2.1 Context

The building at 232 Dundas is a 3-storey brick building constructed c1870 and listed on the City of London's *Register of Cultural Heritage Resources* as a building of interest, due to its "Italianate" details demonstrated in the decorative cornice and heavy keystones of the arched window openings on the building. The subject property is designated under Part V of the Ontario Heritage Act, as part of the Downtown Heritage Conservation District, within the Central London Planning District, the Downtown Business Improvement Area, and fronts onto Dundas Place; "*London's premiere pedestrian destination for shopping, dining, art, and celebration*".

The main floor is currently vacant, and the second and third floors appear to be used as offices, or potentially residential units. The upper floors have a separate entrance to the right of the main doors. 232 Dundas Street is flanked by a clothing store to the west, and a tattoo parlour to the east. Across the street is the vacant, heritage designated, "Mechanics Institute" (229-231 Dundas), and less than 50m east is the entrance to the main branch of the London Public Library (251 Dundas).

### 2.2 Adult Entertainment Impacts

The primary means that municipalities use to regulate adult-oriented businesses include zoning and licensing by-laws. These municipal regulations are justified on the general grounds that adult-oriented businesses generate negative secondary impacts. The zoning and licensing by-laws are considered by municipal Councils in a public forum via advertised public meetings.

As has been provided in previous new licence, and licence substitution reports, staff often refer to land use commentary provided in the book, "*Everything You Always Wanted to Know about Regulating Sex Businesses*" by David E. Kelly & Connie Cooper (American Planning Association, Chicago, 2001).

This reference presents survey data, among other evidence, demonstrating the significant negative impacts concentrations of adult-oriented businesses have on surrounding neighbourhoods; for 2-3 blocks from the 'source'. These impacts include:

- Reduction in residential and commercial values
- Difficulty in selling or renting homes and businesses
- Perceived impact that neighborhood is unsafe
- Increases in vice-related activities and other crimes
- Negative impacts re. noise, lighting, and traffic
- Risk for minors to exposure or contact
- Overall community blight

More recent discussions can be found in "Cities and Adult Businesses – A Handbook for Regulatory Planning", Edited by Roger Kemp (McFarland & Company, North Carolina, 2010). This reference provides case studies that describe the impacts, and analyze the regulation, of adult-oriented businesses identifying various regulatory methods undertaken by local governments.

As Hakes<sup>a</sup> writes after reviewing studies undertaken in other communities:

- Crime rates are higher in areas of adult uses
- Sex crimes are higher in areas near adult uses
- Residential property values are decreased when in close proximity to adult uses

---

<sup>a</sup> Hakes, Jaclyn, "*Saratoga Springs Planning Board Reviews its Adult Use Laws*", from Chapter 36, "*Cities and Adult Businesses – A Handbook for Regulatory Planning*", Edited by Roger Kemp (McFarland & Company, North Carolina, 2010)

- Physical blight is seen near adult uses
- Near adult uses residential properties are not well maintained, financial institutions are more hesitant to invest, etc.
- Most patrons of adult oriented businesses do not live within one mile of the site.

These studies establish the negative impacts sex businesses have on property values and crime levels, especially when the businesses are geographically concentrated.

In Chapter 33, Owens<sup>b</sup> concludes that among the best practices for regulating sex-oriented businesses is to include minimum separation distances not only from sensitive land uses (as the City of London Business Licensing By-law does) but from other sexually oriented businesses as well.

### 2.3 Other Adult Entertainment Locations

It should be noted that there is an existing *Adult Live Entertainment Parlour* (Solid Gold) located approximately 25m southwest of this proposed relocation. There is also an application to relocate an *Adult Live Entertainment Parlour* from 2010 Dundas Street to 238 Dundas Street – approximately 12m east of this proposal.

## 3.0 Conclusion

An application was received to substitute an existing Adult Entertainment Body-rub Parlour at 802 Exeter Road to a proposed location at 232 Dundas Street. The proposed site meets the locational criteria of the Business Licensing By-law. This report summarizes the public comments received in response to the Notice of Application and provides some additional information considered necessary by the License Manager. City Council shall make the final decision on whether to amend the Business Licensing By-law to permit the Adult Entertainment Body-rub Parlour at the proposed location.

If an amendment to Schedule 2A of the By-law is permitted, the current licensed location shall be deleted from the By-law Schedule and the proposed location added to the By-law Schedule. A draft amendment is included with this report as Appendix 'A', should CPSC make this recommendation to Council.

Alternatively, City Council may refuse the application resulting in no changes to the existing By-law & Schedule; the current location at 802 Exeter Road will remain an approved location.

**Prepared by:** Ethan Ling MSc.  
Development Policy Coordinator, Municipal Compliance

**Submitted By:** Nicole Musicco,  
Coordinator, Municipal Compliance

**Reviewed &  
Concurred by:** Orest Katolyk, MPL, MLEO(C),  
Director, Municipal Compliance

**Recommended by:** Scott Mathers, MPA, P. Eng., Deputy City Manager,  
Planning and Economic Development

<sup>b</sup> Owens, David, "Raleigh Laws Challenged By Adult Businesses" from Chapter 33, "*Cities and Adult Businesses – A Handbook for Regulatory Planning*", Edited by Roger Kemp (McFarland & Company, North Carolina, 2010)

## Appendix "A"

Bill No. - 2022

By-law No. L.-131(\_\_)-\_\_

A by-law to amend By-law No. L.-131-16 entitled "A by-law to provide for the Licensing and Regulation of Various Businesses" to provide for the deletion of an Adult Entertainment Body-rub Parlour location at 802 Exeter Road and to substitute it with a new Adult Entertainment Body-rub Parlour location at 232 Dundas Street.

**WHEREAS** the Municipal Council of The Corporation of the City of London wishes to amend By-law No. L.-131-16, as amended, entitled "A by-law to provide for the Licensing and Regulation of Various Businesses" to provide for the deletion of an Adult Entertainment Body-rub Parlour location at 802 Exeter Road and to substitute it with a new Adult Entertainment Body-rub Parlour location at 232 Dundas Street.

**AND WHEREAS** section 5(3) of the *Municipal Act, 2001* S.O. 2001, c.25, as amended, provides that a municipal power shall be exercised by by-law;

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

1. The Business Licensing By-law No. L.-131-16, hereby amended by deleting "Schedule 2A, Adult Entertainment Body-rub Parlour Locations, Municipal Address: 802 Exeter Road, Map 3" in its entirety and by replacing it with the attached "Schedule 2A, Adult Entertainment Body-rub Parlour Locations, Municipal Address: 232 Dundas Street, Map 3".

This by-law shall come into force and effect on the day it is passed.

**PASSED** in Open Council on Month, Day, 2022

Ed Holder  
Mayor

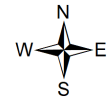
Michael Schulthess  
City Clerk

# SCHEDULE 2A

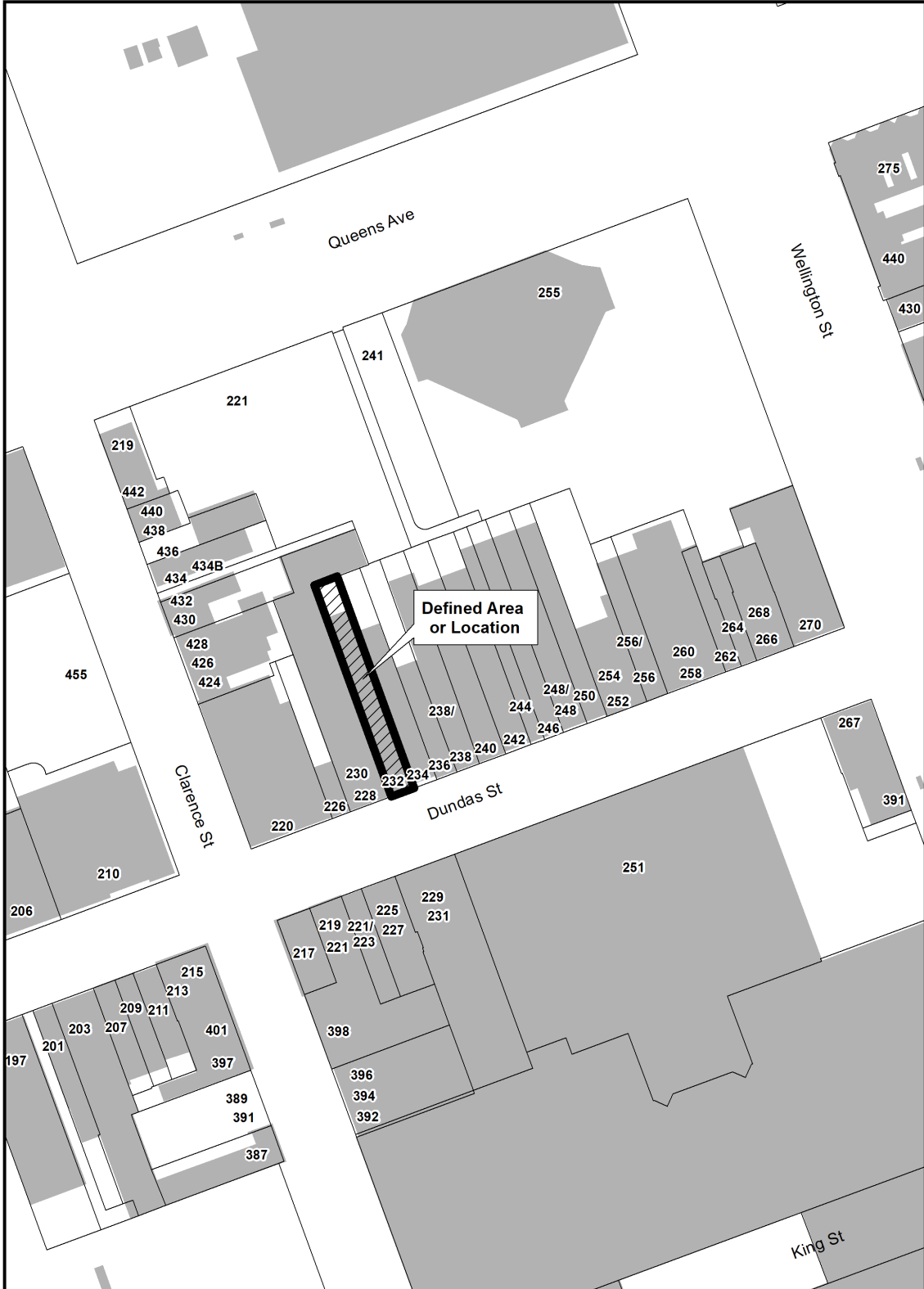
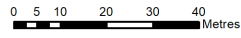
## ADULT ENTERTAINMENT BODY-RUB PARLOUR LOCATIONS

MUNICIPAL ADDRESS: 232 Dundas St

MAP 3



Defined Area or Location



**Appendix 'B' – Notice of Application**

Attachment 1 - Notice of Application (.pdf)





300 Dufferin Avenue  
P.O. Box 5035  
London, ON  
N6A 4L9

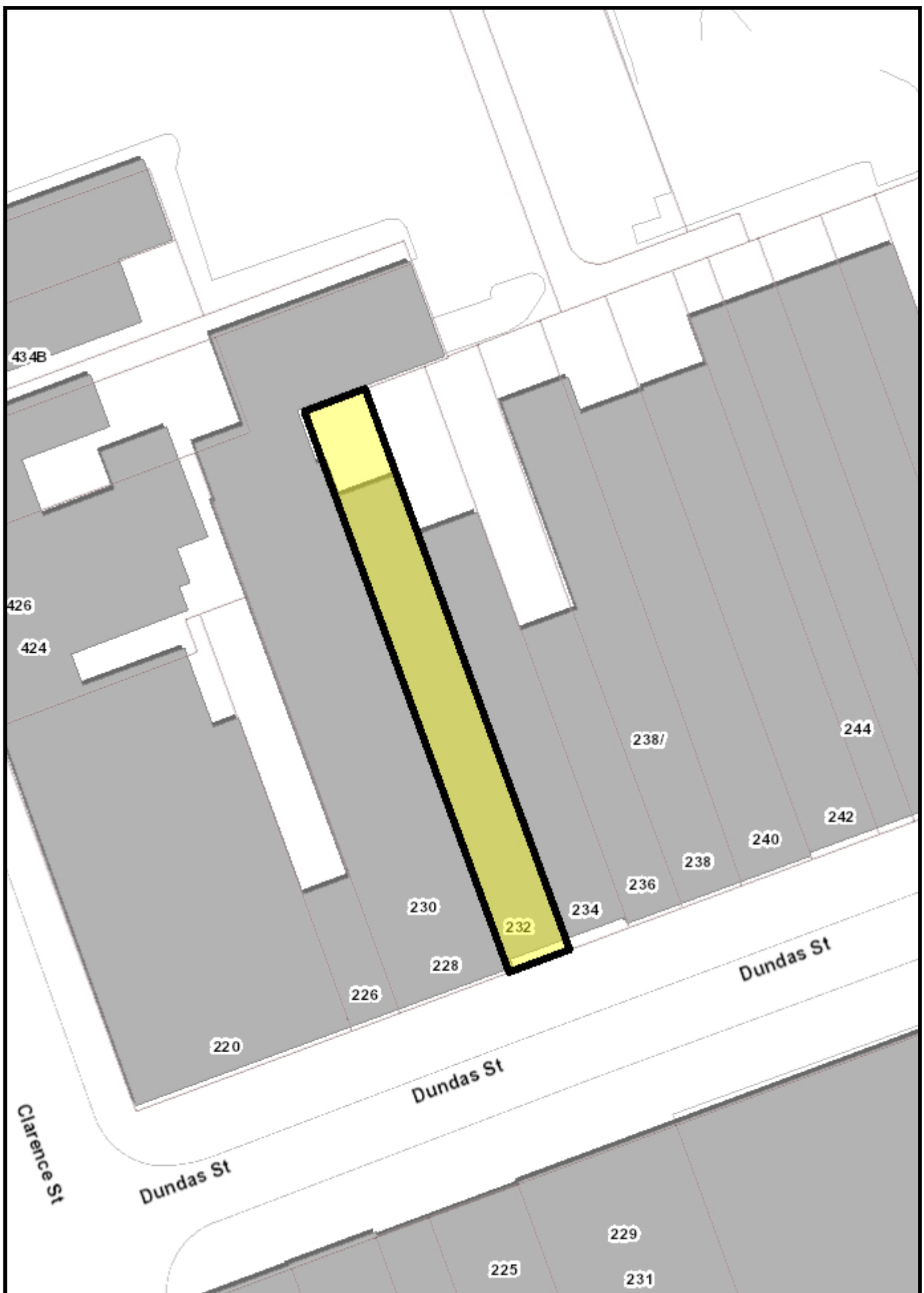
E. Ling  
Tel: 519-661-2489 x.2786  
Email: [eling@london.ca](mailto:eling@london.ca)  
Website: [www.london.ca](http://www.london.ca)

April 4, 2022

## NOTICE OF BUSINESS LICENCE AMENDMENT: Adult Entertainment Body-Rub Parlour Relocation Request

TAKE NOTICE that Municipal Compliance has received an application to relocate an *Adult Entertainment Body-Rub Parlour* from the existing address at 802 Exeter Road to a new location at 232 Dundas Street. Pursuant to Schedule 2, Part 9 of the Business Licensing By-law L.131-16, City Council may consider applications to substitute a new location for an existing location of an *Adult Entertainment Body-Rub Parlour*. You are being advised of this application to invite your comments now and inform you that there will be a future public meeting of the Community and Protective Services Committee on the matter.






<b>APPLICANT:</b>	1781846 Ontario Inc. / Ambiance Spa
<b>LOCATION:</b>	<b>Moving From:</b> 802 Exeter Road, London, ON (Ward #14) <b>Moving To:</b> 232 Dundas Street, London, ON (Ward #13)
<b>PURPOSE AND EFFECT:</b>	The applicant seeks to relocate an existing licensed <i>Adult Entertainment Body-Rub Parlour</i> from 802 Exeter Road to 232 Dundas Street.
<b>HOW TO COMMENT:</b>	<b>COMMENTS ARE DUE BY TUESDAY, May 3, 2022.</b> Any submissions with respect to this application must be made in writing, by mail or email: <b>Mail:</b> Municipal Compliance, Attention: E. Ling <b>Re. Adult Body-Rub Parlour Relocation</b> 7th Floor, City Hall, 300 Dufferin Ave., London, ON, N6A 2L9. <b>Email:</b> <a href="mailto:eling@london.ca">eling@london.ca</a>
<b>FOR MORE INFORMATION</b>	This file has been assigned to <b>E. Ling</b> of Development and Compliance Services, Municipal Compliance. All inquiries and comments can be sent to him at <a href="mailto:eling@london.ca">eling@london.ca</a> , or to the mailing address above.  A map showing the location of the land which is the subject of the application is attached to this Notice.
<b>PUBLIC PARTICIPATION MEETING</b>	As per Schedule 2, Part 9 of the Business Licensing By-law, comments, and recommendations regarding the relocation are to be provided to the City of London. As well, Community and Protective Services Committee (CPSC) shall hold at least one meeting that is open to the public for the purpose of affording an opportunity to the applicant, and any other person who attends the meeting, to make oral submissions in respect of the requested relocation. Those who have received this notice by mail will be notified again, by mail, when the meeting is scheduled. The meeting date and time will also be advertised on the City of London's website; <a href="http://www.london.ca">www.london.ca</a>
<b>COLLECTION OF PERSONAL INFORMATION</b>	Personal information collected as part of this application will form part of the public comment and may be part of the report or presentation on the subject. Questions about this collection should be addressed to the City Clerks Department, 3 <sup>rd</sup> floor, City Hall.



### Location Map

Project Title: 232 Dundas Body-Rub New Proposal  
 Description: Application to substitute existing Adult Entertainment Body-Rub Parlour for a new location at 232 Dundas St.  
 Date: 4/1/2022  
 Scale: 1:500

### Legend

-  Subject Site
-  Parks
-  Assessment Parcels
-  Buildings
-  Address Numbers



**Appendix 'C':  
Comments and Additional Information  
(Attachments Follow)**

**From:** NAME REDACTED

**Subject:** In regard to Adult Entertainment Body Rub Relocation Request

**Date:** Wednesday, May 4, 2022, 8:50:57 AM

Hi there,

I have received notice from NAME REDACTED about a relocation to an Adult Entertainment Body Rub Relocation Request.

Our business does not think this business makes sense in the newly developed tourist area in London. To us it does not make sense for the city to invest so much money on Dundas Place and then have businesses that make people feel weird and unsafe to walk by or be nearby.

We do not want this type of business on Dundas Place. It is already hard enough to get this street looking better and being what the city wants it to be.

Thanks for your time,

NAME REDACTED

-----

**From:** NAME REDACTED

**Sent:** Tuesday, May 3, 2022, 10:09 AM

**Subject:** [EXTERNAL] Re: Notice of Application - Business Licence Amendment - Adult Entertainment Body Rub Parlour Relocation Request

Thank you for forwarding this information. We feel this goes against everything the city has been trying to accomplish with the re-vitalization of Dundas place. As business owners, we have personally invested considerably in trying to create a beautiful building with interesting businesses REDACTED that hopefully appeal to a large audience.

The "Adult Entertainment Body Rub Parlour" business as indicated below is in extremely poor taste and I do not see how it fits in with any of the businesses who are investing money and trying to help to improve the downtown sector- especially along Dundas Place.

It is our hope that Dundas place focuses more on bringing younger people & families to the downtown core. A focus on businesses such as apparel, cafes, & patios is needed in order to create a welcoming atmosphere.

Thank you,

NAME REDACTED

Owners -

ADDRESS REDACTED

-----

**From:** NAME REDACTED

**Date:** Tuesday, May 3, 2022, 7:24:27 AM

**Subject:** [EXTERNAL] Adult Body Rub Parlour Application

I am writing with regards to the application for an adult body rub parlour to be moved to Dundas Street.

As a business owner on Dundas Street, I feel this is counter productive to our efforts to bring more people to the core and optimize the flex street.

This is a business which should remain on the outskirts of the city, if at all.

After 2yrs of construction on Dundas Street in the core, followed by the pandemic, we do NOT need any more deterrents to families coming to visit businesses in the core. We already have a big problem with the drug abusers that hang out in that area of Dundas St.

Festivals, open air markets, and entertainment are what we need, NOT an adult body rub

parlour, and the people it would attract (their owners, staff, and patrons).  
Yes, there is an adult entertainment venue in the area already, which is already a bad thing for the core, business owners and patrons of Dundas St.

---

**From:** NAME REDACTED  
**Subject:** [EXTERNAL] Body Rub Parlour  
**Date:** Monday, May 2, 2022, 4:22:29 PM

NAME REDACTED - we are opposed to this body rub parlour being located on our block of Dundas place. It will bring in a clientele we don't want on this family friendly street and will effectively create a red-light district with potentially two strip clubs adjacent.

Let me know if you would like further comments.

NAME REDACTED  
Co-Owner  
NAME REDACTED  
ADDRESS REDACTED  
London, ON

---

**From:** NAME REDACTED  
**Subject:** [EXTERNAL] proposed body-rub business on Dundas St.  
**Date:** Wednesday, April 20, 2022, 12:12:13 PM

NO!! As a long-time resident of Ward 13 I have seen many businesses come and go - in recent years, mostly go. Due to excessively long construction on the Wellington to Ridout section, the pandemic, and inconsistent policing we have enough whores, derelicts, and addicts. The city must concentrate on attracting positive businesses that will enhance our reputation and improve living/working for the majority of citizens and visitors. We must not encourage more crime!! I believe that the City has a policy of no new sex shops of any description and that existing ones are to remain at their current addresses. I will contact my current councillor as well - I understand that he would like to be re-elected.

---

**From:** NAME REDACTED  
**Subject:** [EXTERNAL] Adult Body-Rub Parlour Relocation Request to 232 Dundas Street (application filed under 1781846 Ontario Inc/Ambiance Spa

**Date:** Tuesday, May 3, 2022, 12:55:45 PM  
Dear NAME REDACTED

Please hereby accept our submission of comments to the above application. We oppose the relocation application: Adult Body-Rub Parlour Relocation Request to 232 Dundas Street. We are the property owners and landlords of some 20 storefronts and 100+ residential tenants along Dundas Street, including 236 Dundas, 246 Dundas and 252/4 Dundas. As such we understand the devastating impact businesses/services can have on the overall vision and experience of a neighbourhood. The vision of establishing a family friendly, residentially flourishing music, arts and food district downtown are sound, after years of investment in numerous congruent ventures. The John Labatt Centre, The Covent Garden Market, The London Public Library and large investments in public infrastructure upgrades are complete. This is now bearing fruit as the quality of commercial tenants along Dundas is steadily improving with the likes of Petrov Bridal, Grooves, Fanshawe College, CBC Radio and many others. Residential core developments are also increasing rapidly, bringing additional people permanently

downtown.

While this relocation application is at the discretion of the city, we believe that this application is not a good fit for our tenants, the value of our properties and consequently will have a devastating negative impact on our properties and ability to attract quality tenants. This in turn will impact revenue of all stakeholders negatively.

If an individual business or type of business has a negative impact on all the other stakeholders in an area, such as visitors, residents, businesses, property owners, the City of London and the intended target audience, this fact has to be recognized and eliminated.

We oppose this application and request that it is declined.

Signed,

**NAME REDACTED**

Communications Officer

On behalf of Nora Property Management Inc.:

Westany Holdings Inc (236 Dundas St)  
2227043 Ontario Inc. (246 Dundas St)  
2162538 Ontario Inc. (175/9 Dundas St)

-----

**From:** **NAME REDACTED**

**Subject:** [EXTERNAL] Re: Adult Body-Rub Parlour Relocation Proposal

**Date:** Monday, May 2, 2022, 10:01:31 AM

Hello,

This is a response to the Notice of Business License Amendment I have received recently regarding the possible relocation of an Adult Body-Rub Parlour to 232 Dundas Street, London, ON (attached for reference). My name is **NAME REDACTED** and I am the President and 100% beneficial owner of 2761172 Ontario inc, which owns the property at 244 Dundas Street.

I have very serious concerns about the proposal to relocate an adult body-rub parlour to the area. It is a rejuvenated area, with significant investment made by the City of London to redevelop Dundas St into a groundbreaking flex street, and significant investments made by landlords in the area to attract high-quality tenants to the area and support further gentrification of the neighborhood.

As far as I am aware, there are no similar businesses in the area and it should stay that way. There is no place for an adult massage parlour in a rejuvenated area like this. It is counterintuitive to the current "clean up" initiative and as far as I am aware zoning regulations do not permit these kinds of establishments.

Furthermore, all four residential units in my building are rented by single women. I go out of my way to create a safe, hospitable environment for them where they feel comfortable making their home. Adding an adult massage establishment in the vicinity will certainly not help foster the atmosphere of safety and inclusion we should all seek to create in the area of downtown London. I remain at your disposal in case of any inquiries.

Thank you

**NAME REDACTED**

President

2761172 Ontario Inc

-----

**From:** NAME REDACTED

**Subject:** [EXTERNAL] Adult Entertainment Relocation Application Concerns

**Date:** Monday, May 2, 2022 3:11:32 PM

Hello,

We here at NAME REDACTED have a lot of objections to the current proposal of the relocation of Ambiance Spa to Dundas Street. We are already having many problems with needles and homelessness on Dundas Street. We are very concerned that this problem will escalate the current situations that we are experiencing. Also I have looked into the business hours of Ambiance and they are open at 10am and some days are open 24 hours. We are very concerned about the drug related issues and type of clientele that this business would attract. Also the flex street was created to clean up downtown and as a business owner I fear that this will further damage the reputation of Dundas Street.

Kind Regards

--

NAME REDACTED

ADDRESS REDACTED

London, ON N6A 1H3

Canada

-----  
**From:** NAME REDACTED

**Subject:** [EXTERNAL] Re: Notice of Application - Business Licence Amendment - Adult Entertainment Body Rub Parlour Relocation Request

**Date:** Tuesday, May 3, 2022 3:17:12 PM

Hello NAME REDACTED

My name is NAME REDACTED and I work at ADDRESS REDACTED Dundas Street.

We are REDACTED and would, I feel, be negatively impacted.

I say an emphatic NO to the idea of a body-rub parlour on this portion of Dundas Street.

If the City of London is trying to make Dundas Place an up-scale, inviting location for people to visit with their families and friends, I feel this type of business would not only bring down the quality of the street but would in fact discourage people from coming downtown.

Please do not allow this to go through.

Sincerely

NAME REDACTED

ADDRESS REDACTED

PS : I also happen to lead walking tours of the downtown for Museum London - and I always brag to my tour groups that Dundas Street is making a comeback as a great place to visit. From my experience, tour-goers would not consider a body-rub parlour an asset.

-----  
**From:** NAME REDACTED

**Subject:** [EXTERNAL] Adult Entertainment Body Rub Relocation -232 Dundas Street

**Date:** Friday, April 29, 2022 7:12:35 AM

When I first became aware of the business licence amendment notice posted at 232 Dundas the first words out of my mouth were '**you have got to be kidding!**'

It has not been that long that the entire downtown was awash of construction resulting in an attractive multipurpose street leading to the Forks of the Thames. It was anticipated that

Dundas Place would be a meeting place for cultural events, pop up markets, concerts-the list goes on and on. A perfect backdrop for the first Canadian city named UNESCO City of Music. A jewel!

Unfortunately, many shops could not survive the 2 year road closure, the following 2 years of Covid shutdowns, homeless campouts and rampant vandalism. A war zone resulted. People did not come downtown and if you lived downtown you avoided Dundas Street. And now this nonsensical request just as things are starting to stabilize!

The city must be selective with rezoning and should focus on allowing the types of businesses that represent the city's mission. If our wish is to have a viable, energetic core we must attract young adults, seniors and families downtown to enjoy the variety of restaurants, unique shops, patios, concerts, festivals, hockey, etc. I do not believe an Adult Entertainment Body Rub Parlour is part of this picture. Over the next few years the downtown area will be awash with more new residents judging by the numerous construction cranes dotting the downtown skyline. This bodes well for future businesses and a vibrant core.

The city should also utilize a survey of the current shops in the area when considering this request. The London Public Library is a half block away of the property in question. Hopefully the Community and Protective Services Committee will deny this request quickly or what would be next for Dundas Place- perhaps biker bashes on Friday the 13th or nude sunbathing at the forks of the Thames!

**NAME REDACTED**  
**ADDRESS REDACTED**

---

**From:** **NAME REDACTED**

**Subject:** [EXTERNAL] rub and tug

**Date:** Monday, May 2, 2022 4:26:38 PM

This is a terrible addition to the downtown mix. Will only add another reason why so many people in London refuse to come downtown.

**NAME REDACTED**  
**ADDRESS REDACTED**

Pres

---

**Subject:** [EXTERNAL] 232 Dundas st.

**Date:** Monday, May 2, 2022 1:01:40 PM

I will start by saying that I was confused by the second application. It was very similar to 238 Dundas St.

My objections are the same as for 238 Dundas St.

Is this really the way the city wants to go with the investments made to Dundas Place?

This is a very poor fit for a street that is going to be a cultural center and showcase for the city of London.

If the 2 new applications for adult entertainment are approved for the block it will become the sleaze center for London.

Cheers,  
**NAME REDACTED**

---

**Appendix 'C'**  
**Attachment 1 - Pocrnic Realty/Bank of Montreal – Comment/Letter**

**TO BE INSERTED AS .PDF**





*On Behalf of Net Blue Investments Inc.*

April 12, 2022

VIA EMAIL: [ELING@LONDON.CA](mailto:ELING@LONDON.CA)

Municipal Compliance  
7<sup>th</sup> Floor, City Hall, 300 Dufferin Ave.,  
London, ON N6A 2L9

**ATTENTION: E. LING**

**RE: ADULT BODY-RUB PARLOUR RELOCATION  
270 DUNDAS ST. LONDON, ONTARIO  
BANK OF MONTREAL**

---

Dear E. Ling,

This letter is to convey our strong opposition to the proposed relocation of the above noted business to 232 Dundas Street in London.

By approving this application, you will be negatively impacting all the businesses in the immediate and surrounding vicinity.

On behalf of the Landlord, its asset manager, and the Bank of Montreal, we insist that you deny this relocation request.

Please contact me if you have any questions or concerns at (905) 522-7936 X226

Sincerely,

**POCRNIC REALTY ADVISORS INC.**

DocuSigned by:  
  
E44FE8352CB7490...  
Sean Astins  
Senior Property Manager

CC: Steve Pocrnic, President, Pocrnic Realty Advisors Inc.  
CC: Dan Cooke, Senior Retail Portfolio Manager, Bank of Montreal



300 Dufferin Avenue  
P.O. Box 5035  
London, ON  
N6A 4L9

E. Ling  
Tel: 519-661-2489 x.2786  
Email: [eling@london.ca](mailto:eling@london.ca)  
Website: [www.london.ca](http://www.london.ca)

April 4, 2022

**NOTICE OF BUSINESS LICENCE AMENDMENT:  
Adult Entertainment Body-Rub Parlour Relocation Request**

TAKE NOTICE that Municipal Compliance has received an application to relocate an *Adult Entertainment Body-Rub Parlour* from the existing address at 802 Exeter Road to a new location at 232 Dundas Street. Pursuant to Schedule 2, Part 9 of the Business Licensing By-law L.131-16, City Council may consider applications to substitute a new location for an existing location of an *Adult Entertainment Body-Rub Parlour*. You are being advised of this application to invite your comments now and inform you that there will be a future public meeting of the Community and Protective Services Committee on the matter.

<b>APPLICANT:</b>	1781846 Ontario Inc. / Ambiance Spa
<b>LOCATION:</b>	<b>Moving From:</b> 802 Exeter Road, London, ON (Ward #14) <b>Moving To:</b> 232 Dundas Street, London, ON (Ward #13)
<b>PURPOSE AND EFFECT:</b>	The applicant seeks to relocate an existing licensed <i>Adult Entertainment Body-Rub Parlour</i> from 802 Exeter Road to 232 Dundas Street.
<b>HOW TO COMMENT:</b>	<b>COMMENTS ARE DUE BY TUESDAY, May 3, 2022.</b> Any submissions with respect to this application must be made in writing, by mail or email:  <b>Mail:</b> Municipal Compliance, Attention: E. Ling <b>Re. Adult Body-Rub Parlour Relocation</b> 7th Floor, City Hall, 300 Dufferin Ave., London, ON, N6A 2L9.  <b>Email:</b> <a href="mailto:eling@london.ca">eling@london.ca</a>
<b>FOR MORE INFORMATION</b>	This file has been assigned to <b>E. Ling</b> of Development and Compliance Services, Municipal Compliance. All inquiries and comments can be sent to him at <a href="mailto:eling@london.ca">eling@london.ca</a> , or to the mailing address above.  A map showing the location of the land which is the subject of the application is attached to this Notice.
<b>PUBLIC PARTICIPATION MEETING</b>	As per Schedule 2, Part 9 of the Business Licensing By-law, comments, and recommendations regarding the relocation are to be provided to the City of London. As well, Community and Protective Services Committee (CPSC) shall hold at least one meeting that is open to the public for the purpose of affording an opportunity to the applicant, and any other person who attends the meeting, to make oral submissions in respect of the requested relocation. Those who have received this notice by mail will be notified again, by mail, when the meeting is scheduled. The meeting date and time will also be advertised on the City of London's website; <a href="http://www.london.ca">www.london.ca</a>
<b>COLLECTION OF PERSONAL INFORMATION</b>	Personal information collected as part of this application will form part of the public comment and may be part of the report or presentation on the subject. Questions about this collection should be addressed to the City Clerks Department, 3 <sup>rd</sup> floor, City Hall.

**Appendix 'C'**  
**Attachment 2 – London Abused Women's Centre Letter/Comment**

**TO BE INSERTED AS .PDF**



797 York Street – Unit 5  
London ON N5W 6A8  
t. (519) 432-2204  
f. (519) 679-3918  
info@lawc.on.ca

Providing counselling, advocacy and support for abused women.

April 22, 2022

Mr. Ethan Ling  
Municipal Compliance  
City of London

### **Re: Adult Entertainment Body-Rub Parlour Relocation Request**

The London Abused Women's Centre has been providing service to women and girls who have been exploited and trafficked for nearly 25 years. Since 2015, LAWC has supported over 2,800 women and girls who have been trafficked and over 1,800 women and girls who are at risk of being trafficked with long-term, trauma-informed, woman-centered counselling, advocacy, and support. These numbers include at least 68 girls who report they were under 18 years old.

Sex trafficking is a form of sexual exploitation that can include recruiting, obtaining, or providing a person for the purpose of sex. In Ontario, sex trafficking is the most reported form of human trafficking.<sup>1</sup>

The demand for paid sexual services fuels the growth of trafficking and exploitation of our most vulnerable populations. Victims of sex trafficking are often lured or coerced into the commercial sex industry.

Two-thirds of all trafficking in Canada originates in Ontario.<sup>2</sup> London, Ontario is a hub for sex trafficking because it is the first large city located between Windsor and Toronto with easy access from highway 401 into hotels and motels.

While trafficking affects all demographics, traffickers frequently target individuals who lack strong support networks, are facing financial strain, have experienced violence in the past, or who are marginalized by society.

In February of this year, the London Police Service launched an Anti-Human Trafficking Campaign using the hashtag #KnowHumanTrafficking to help raise awareness and educate the community on the risks and warning signs associated with human trafficking. The goal is to reduce victimization and revictimization through public education, promotion, and encouragement of public engagement.

The City of London has a pillar in the strategic plan to create a safe London for women and girls with the outcome being to enhance the potential for women and girls to live safe lives. There has been a

---

<sup>1</sup> <https://www.ontario.ca/page/about-human-trafficking>

<sup>2</sup> <https://www.canada.ca/en/public-safety-canada/campaigns/human-trafficking.html>

commitment from the City of London to apply a trauma and violence informed lens to the strategic plan, ensuring that an intersectional approach is applied to address violence against women and girls in our community.

Again, the demand for paid sexual services fuels the growth of trafficking and exploitation of our most vulnerable populations. There are members of our community who are at risk of violence for no other reason than who they are. Approving this application for relocation would be a mistake.

To that end, the London Abused Women's Centre recommends the London City Council not only deny the application for relocation but revoke the license completely.

London City Council has a responsibility to make decisions based on the best interests of all individuals especially those who are most vulnerable.

Thank you,

A handwritten signature in black ink, appearing to read 'JDunn', written in a cursive style.

---

Jennifer Dunn  
Executive Director  
London Abused Women's Centre

**Appendix 'C'**  
**Attachment 3 – Farhi Holdings Corporation Comment**

**TO BE INSERTED AS .PDF**

15 April, 2022

By Email Only

E. Ling  
**Municipal Compliance**  
7<sup>th</sup> Floor, City Hall  
300 Dufferin Avenue  
London, ON, N6A 2L9

**FARHI**  
HOLDINGS CORPORATION

Re: Adult Body-Rub Parlour Relocation

---

Dear Mr Ling,

I am writing with regard to the notice received from the City of London, titled "Notice of Business License Amendment: Adult Entertainment Body-Rub Parlour Relocation Request".

I welcome this opportunity to voice my **strong opposition** to 1781746 Ontario Inc. / Ambiance Spa to move their "Body-Rub Parlour", currently located at 802 Exeter Road to 232 Dundas Street, effectively into the heart of downtown. On behalf of everyone who supports a safe, robust and economically successful downtown core, I truly hope level heads prevail in this matter.

The City of London has invested a great deal of thought, planning and money into the strategic reinvigoration of the downtown, and more work is underway to facilitate transportation infrastructure, beautification, and otherwise 'clean up' the area in order to attract business and residents.

As stated in your Core Area Action Plan, the City envisions the downtown as a place where businesses, their employees and customers, along with local residents, can live, work and play safely. Please see: <https://london.ca/sites/default/files/2020-11/2019-10-18%20Core%20Area%20Action%20Plan%20-%20reduced%20and%20AODA.pdf>

Approving this application would run contrary to the City's repeated sentiments and ongoing efforts to transform the downtown into a prosperous, thriving, safe hub for all. It would also invite new trouble for the area residents and businesses, whether recently established or have stuck it out for years, hoping for change. Adult entertainment clubs do not cater to the family-friendly experience that downtown wishes to foster.

**Farhi Holdings Corporation**

Suite 201 – 620 Richmond Street • London, ON, N6A 5J9

T (519) 645 – 6666 • F (519) 645-7735 • [www.farhi.ca](http://www.farhi.ca)

The City of London's policy on Dundas Place is:

*794\_ Dundas Street will be the most exciting street in the city, offering a multitude of experiences along its length. We will connect strongly to our birthplace, at the Forks of the Thames, where we will create beautifully landscaped "people places" that Londoners will gravitate toward. And, we will cherish our heritage streetscapes that tell the story of our past, and create a unique and enriching setting that will give our core a strong sense of place and identity. London Plan*

*Dundas Place: Why is this project important? This project identifies and reinforces Dundas Street as the most exciting street in the city. It builds on the legacy of the downtown. It supports the street's development as a premiere destination for cultural and entertainment events that can easily and frequently merge with adjacent commercial enterprises to create diverse multi-sensory experiences.*

Part of the draw towards Dundas Place is its inclusive nature. By placing a 'Body-Rub Parlour' in its midst, it is necessarily excluding sections of the population, to the detriment of local business and the intended purpose of Dundas Place.

Finally, I would like to note that the proposed location would be across from the Central Library. This is a civic landmark, which we as Londoners should safeguard. This includes its surrounding and context within our neighbourhood.

Thank you for the opportunity to respond to the application. Please contact me at your convenience should you wish to discuss this matter further.

Yours sincerely,

A handwritten signature in brown ink, appearing to read 'Shmuel Farhi', enclosed in a circular scribble.

**Shmuel Farhi**  
President  
Farhi Holdings Corporation



**Appendix 'C'**  
**Attachment 4 – Downtown London Survey May 2 (.pdf)**

**TO BE INSERTED AS .PDF**



**May 2nd, 2022**

Municipal Compliance  
Attention: Ethan Ling  
7<sup>th</sup> Floor, City Hall, 300 Dufferin Ave  
London, ON N6L 2L9

Dear Ethan Ling,

Please find a brief summary report as a part of our recent advocacy efforts regarding the ***Notice of Business Licence Amendment- Adult Entertainment Parlour Relocation Request for 232 Dundas Street.***

As the deadline for comments was stated as May 3<sup>rd</sup>, we wanted to ensure you received them in a timely manner.

If you have further questions, please feel free to contact our office.

Sincerely,

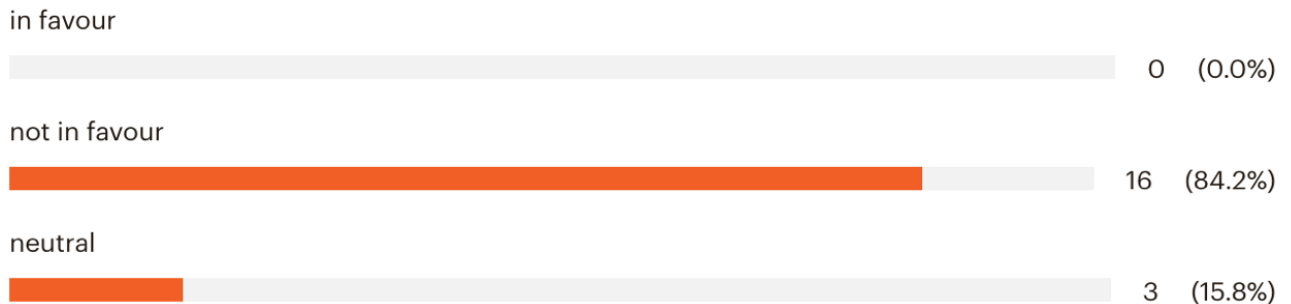
A handwritten signature in black ink, appearing to read "Barbara Maly", is written in a cursive style.

Barbara Maly, Executive Director  
Downtown London

## Member Survey Results

The Member survey was forwarded by MailChimp, to a total of 122 merchants on Dundas Place and Clarence Streets. There were 59 opens and 19 responses as per chart below.

### 1) “My position on this matter”



### 2) “Please feel free to explain how this matter will positively or negatively affect your business. ”

"I am wholly opposed to relocation of a rub 'n tug to the core of our city. We have been told repeatedly by City staff that all of the construction our downtown businesses, organizations, and residents have suffered through over the past few years is to revitalize our city's core and make it welcoming destination. The opening of a sex parlor right across the street from one of the city's largest public facilities, on a stretch of Dundas Street that is already under extreme duress due to crime, homelessness, public urination and defecation, and open consumption of hard drugs, seems completely at odds with the stated intended purpose of the Dundas Place project. It is bad enough that there is a strip club at Dundas & Clarence already: does the core really need to become a destination for the sex-for-cash crowd? I am flabbergasted as to what the business case could possibly be for allowing a sex parlor to open here. What kind of people do we want frequenting Dundas place? What kind of faith can our city's residents have in how our tax dollars are spent if all the great cost and effort to make Dundas

Place a beautiful and exciting destination turn out to be largely for the benefit of the seediest aspects of our society? Please, I am begging you to reject this relocation proposal for this business. As part of the Central Library that is struggling to bring people back downtown, especially families, this would not encourage that. Additionally, as a venue that many people do not feel comfortable attending because of its location, this certainly wouldn't help. "

"NO NO and NO !!!! This would negatively affect downtown Dundas Street terribly."

"I am not sure that having another erotic facility within 1 block of Solid Golds is necessary, I believe it may attract a crowd downtown that is counter to all the other initiatives out forth by the city and Downtown London"

"I thought the city was trying to make the core more vibrant and family friendly and after significant investment we are seeing some improvement. This will NOT help in any way. This will make the area more seedy and keep people from coming to our restaurant. A vibrant, safe core is essential to a city now and for the future. People I speak with have been reluctant to come down to the core, but just recently we having been getting comments that it is better than they expected. They probably had pretty low expectations, but it shows some improvement. We already have a strip club we have to deal with (and we get many negative comments about it), we don't need more of this type of business. This will also discourage other businesses from setting up in the many vacant storefronts. This will definitely affect our bottom line in a negative way and we are barely hanging on now. We can't take another hit. This will not just affect the retail and hospitality sectors. It will also discourage offices from setting up on Dundas. Tourists are likely get a negative impression of the city as they walk from their hotels to the theaters and other venues, passed a strip joint and a body rub parlor. This could be a major hit on the tourism and convention business, hurting many more businesses. Please reject this application for the betterment of the downtown core and the future of the city. "

"The only thing this may effect is our parking out back. The tenants on that block already have limited spaces. As long as the staff can respect the space and not have each employee taking up a spot or park in others spaces out back then that's great."

"Hard pass. "

"We are a business located on this block of Dundas Street. We already face challenges enticing customers to visit due to concerns over the reputation and safety of the street. A business such as the one proposed does little to support a family friendly, welcoming, safe and clean environment. "

"Totally against this type of activity in the downtown where we do hope one day will be free of people sleeping in doorways, a sense of safety, a return to healthy & vibrant retail. There is a young persons dance studio, and the library near by, plus Fanshawe College. Not appropriate at all to add more misogynist activities to go with the strip club/bar."

"While we understand the necessity of this business for the people it employs, the adverse effect it would have not only on the legitimacy and safety of our business it would affect the downtown core. These establishments foster a specific kind of demographic to hang out around them and frequent them, once which would decrease the safety in downtown as street beat already has a tentative handle on the amount of extreme mental health crisis. Safety of the employee's is also a main risk, with all the mental health issues around downtown a spot where men will feel entitled to "treatment", should there be a rejection the reaction would be much larger than outside this environment. As a clinic interacting with many men who call/come in assuming that they can have inappropriate touching, especially in downtown they have a negative reaction. Our receptionist has been threatened and called many disrespectful things, with a business that can't be regulated its open to this kind of harassment would be ridiculous. As well as that our employees are educated registered massage therapists that we go out of our way to protect and have treated respectfully. This business being merely doors down will have our legitimacy called into question and receive more harassment. Along those lines as well, the location is in such a proximity to businesses that will undoubtedly have a negative impact; like the dress store next door that has a demographic of young teen girls that will have to navigate the men who are attracted to

hang out around these establishments. Downtown has spent nearly 3 years investing to make the core a hospitable for families to frequent and events to take place. While the staff of the establishment might be very nice, the people they elicit around them will make it more hostile especially for women and children. To place a facility like this around many businesses that bring in young women and children is setting up a spot for high levels of harassment to take place.

"Dundas Place is already struggling with an image problem. Location of this type of adult business will add fuel to the arsenal for Londoners who already feel that the downtown has undesirable characters and businesses. Even though the clients, employees and owners of this business are likely fine individuals, the negative assumptions would be damaging to the existing businesses in the area who are trying to keep clients coming back downtown. If Dundas Place was more fully embraced by Londoners as a great part of the city, the location of this business might have been viewed as an intriguing addition to the streetscape but we are not there yet."

"My opinion parlour industry should be away from downtown."

"If the goal is revitalize Downtown London with businesses that are family friendly, this type of business goes against that objective. As my business has a big group of children and teens, that will impact the decision of the families continue to bring them to downtown. If that happens I will most likely move out of downtown."

"Brings the wrong type of people downtown."