

July 23, 2025

To the City Clerk:

*Please add these comments to the agenda for the July 23, 2025 City Council meeting on item **PH23.3 - Advancing Six Sites for the Homelessness Services Capital Infrastructure Strategy (HSCIS) - City-Initiated Official Plan Amendment and Six Zoning By-law Amendments - Decision Report - Approval***

We request that these comments be publicly visible on line and understand that these comments and the personal information in this email will form part of the public record and that our name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, we understand that agendas and minutes are posted online and our name may be indexed by search engines like Google.

To: Mayor Olivia Chow and Members of Toronto City Council

Re: PH23.3 - Advancing Six Sites for the Homelessness Services Capital Infrastructure Strategy (HSCIS) - City-Initiated Official Plan Amendment and Six Zoning By-law Amendments - Decision Report - Approval

Opposition to Motions for Zoning Amendment for 66–66Y Third Street

Dear Mayor Chow and Members of City Council,

We are writing to formally outline a serious breach of public trust and to urge members of City Council to act in the broader public interest. The decisions to rezone 66–66Y Third Street for a four-storey homeless shelter, and to eliminate an adjacent laneway were advanced by the Planning and Housing Committee despite clear procedural flaws and a lack of meaningful community consultation. Critical impacts on the local community remain unaddressed, and the proposed actions place an unfair and disproportionate burden on the neighbourhood of New Toronto, raising serious concerns about systemic discrimination. This is not equitable planning; it is a failure of process and principle that City Council has a responsibility to correct.

City Council must overturn the decisions made by the Planning and Housing Committee. This is not a debate about the need for shelter services, this is about upholding basic principles of good planning, equity across communities, and the right of residents to a transparent, fair, and fact-based process.

The following outlines the reasons City Council must reject these motions and reconsider its approach:

1. Misleading/Lack of Fair Notice, Procedural Breach, and Inopportunity for Meaningful Review and Response:

- The sign posted on-site falsely claims that a shelter is permitted under the current zoning. It is not. The land is zoned Commercial (C) under Etobicoke By-law 1987-0224,

which permits only a public parking lot. A shelter is not a permitted use, and a full rezoning is required before this use can proceed.

- This misrepresentation violates Section 34(12) of the Planning Act, rendering the notice:
 - Factually incorrect – shelter use is not permitted under current zoning,
 - Legally misleading – it omits the requirement for rezoning,
 - Procedurally defective – it impairs the public’s ability to respond meaningfully to a proposed change in land use.
 - What was approved by the Planning and Housing Committee is missing most of the studies and reports that typically support a re-zoning request. Key reports, including Planning Justification, Urban Design Brief, Arborocultural, and Transportation Impact Assessments, have not been provided, let alone essential studies such as Wind, Shadow, or Affordable Housing Reports. Because the City omitted these basic reports, the community has not been given fair notice or opportunity to respond.
 - In addition, final zoning amendments were made available just one day before the Committee meeting. Even more egregiously, notice of the motion to eliminate the public laneway was issued the morning of the meeting itself. This last-minute disclosure prevented fairness and denied meaningful public participation.
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2. Violation of Public Trust through Flawed, Biased, and Performative Consultation

- There have been no dedicated community input sessions specific to 66 Third Street. The performative consultation that did occur was also deeply biased and those running it were in a conflict of interest position. Staged "information sessions" allowed no opportunity for community input or alternatives.
 - Woods Manor seniors, who are the most directly impacted, were promised a dedicated information session. Instead, they received only a token drop-in in the lobby.
 - Local businesses relying on the parking lot were never formally and fully engaged.
 - Through Freedom of Information it has been discovered that Ward 3 Councillor Morley misrepresented her knowledge of the shelter site, and had a hand in directing the performative measures of community engagement.
 - The suppression of democratic participation was clear when the City chose to combine six high-impact, distinct proposals into a single chaotic Planning and Housing Committee meeting; the only remaining opportunity for formal public input. This approach effectively truncated public scrutiny, diluted meaningful community concerns, and treated public opposition as little more than a procedural nuisance.
 - Deputants at every committee meeting have been consistently ignored, dismissed, time-limited and even scolded, a shameful display of disregard for public input and a blatant violation of the democratic process.
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3. Spot Zoning and Incomplete Planning Rationale

- This proposal constitutes clear spot zoning, with no justification grounded in good planning practice. The City is attempting to rezone a small, ill-suited lot for high-

intensity institutional use without key supporting studies, and with contradictory documentation just to rubber stamp approval of a flawed shelter expansion strategy.

- The motions approved by the Planning and Housing Committee were based on zoning amendments riddled with inconsistencies that call their validity into serious question.
- With no grading, contradictory height measurements (ranging from 16.5M to 25M), incorrect setbacks, and no clarity on units per floor, it's impossible to determine what the city actually intends to build at 66 Third St.
- The discrepancies between the zoning amendment and architectural plans are material and misleading with at least 8 points of discrepancy:

Discrepancy	Architectural Plans Zoning Amendments	
Building Height	16.5 metres	20 metres
Mechanical Penthouse	TBD	5 metres
Number of Storeys	4 + basement	Unlimited
Landscaping	Unknown	15%
Amenity Space	482 m ²	200 m ²
Bike Parking	8 spaces	2 spaces
Density (FSI)	2.03	Unlimited
Beds	~50	50

- This mismatch reveals a serious process integrity issue. If the amendments pass, the City could construct something significantly different than what has been shown to the public.

4. New Toronto is being Targeted: City Imposing Disproportionate Social Burden Through Systemic Discrimination

- New Toronto is already home to:
 - Over 64% of all RGI housing in South Etobicoke, 27% of all rental stock is subsidized
 - Over 200% of our ward's average for subsidized housing,
 - New Toronto, has the lowest median household income, the largest proportion of low income residents.
- Once again, our community is being forced to bear a disproportionate burden. The City's approach is not about equity, it's about entrenching economic imbalance and creating a permanent poverty zone in New Toronto. This isn't fairness. It's systemic discrimination, plain and simple.
- The 66 Third Street site was selected based on a flawed "surplus lot" analysis by the Toronto Parking Authority, bypassing public consultation. There was no equity analysis, no formal impact assessment, and no formal consultation with adjacent residents or businesses. It is clear that shelter advocates on City Staff manipulated the process and

the selection decision had already been made before the so-called consultation had even begun.

5. Violation of the City's Own Shelter Guidelines

The proposed site:

- Is the smallest of all six shelter locations (only 9,246 sq. ft.),
- Falls well below the 15,000 sq. ft. minimum recommended for shelters,
- Has no parking, no setbacks, and insufficient green or amenity space,
- Is the only site not on a Main street or Avenue rather situated on a small residential dead end side street.

When the City fails to follow its own guidelines, it doesn't just break process it breaks public trust.

6. Lack of Fit: Site Incompatibility, Community Impact and Loss of Vital Infrastructure

- The site is bordered by:
 - Woods Manor (Toronto Community Housing for seniors),
 - A children's park,
 - Two schools within 250 metres,
 - Low-rise single-family homes.
- The proposed shelter has no green space, no outdoor use area, no traffic mitigation, and no operational plan to accommodate the needs of vulnerable residents.
- The Green P parking lot serves families, seniors, and small businesses. It is being eliminated with no replacement and no input from Economic Development or the BIA.

7. Undermining the Planning Process

Had this application come from a private developer, it would have been summarily rejected by the Planning Department. Instead, it was passed despite its clear flaws.

This proposal fails all four tests of a minor variance:

1. Not minor – sweeping changes to setbacks, height, and use.
2. Not desirable – institutional-scale use in a low-rise residential zone.
3. Violates zoning by-laws – allows a use not permitted and overrides nearly all standards.
4. Violates the Official Plan – bypasses consultation and context-sensitive planning.

Conclusion

Instead of adhering to established planning principles and regulatory frameworks, the City appears to be rewriting the rules in real time. The proposal approved by the Planning and Housing Committee features zero setbacks, excessive massing, on-street waste storage, no on-site parking, and no transitional elements, each in direct contradiction to the City's own urban design and compatibility guidelines. This outcome is the result of Council's abdication of its legislative responsibility, effectively delegating critical land use decisions and communications to third-party operators and staff through a flawed and procedurally deficient process at every stage.

The Planning and Housing Committee chose to completely ignore a petition signed by nearly 2,800 South Etobicoke residents - not opposing shelters, but demanding good planning, honesty, and fair treatment. Without acknowledgment or comment, they steamrolled ahead and approved the zoning amendments, disregarding the community's voice.

The proposed development at 66 Third Street is:

- Overbuilt and incompatible with the site,
- In violation of zoning,
- Disruptive to neighbourhood character,
- Unfairly imposed on an exploited community,
- Damaging to our built form and local economy.

We call on City Council to:

1. Reject the motions for zoning amendments and laneway removal at 66 Third Street,
2. Halt the project until proper consultation and planning reviews are conducted,
3. Identify a more appropriate site for the proposed shelter,
4. Respect the integrity of the Official Plan and planning process.

Councillors, this is not just about Ward 3. Acceptance of these motions as they stand sets a dangerous city-wide planning precedent. This could happen in your ward next. We request you vote to reverse the decision of the Planning & Housing Committee on July 15, 2025 regarding 66 Third Street.

This is a moment that demands real leadership. Oppose these deeply flawed procedures and motions. Reset the process with integrity and transparency. Respect the voices of residents who have been sidelined. Every neighbourhood deserves thoughtful, equitable planning, not neglect and imbalance. Stand up for what's right. Because if you allow New Toronto to be unfairly targeted, the integrity of the entire city is at stake.

Respectfully,

Cameron Ley on behalf of

South Etobicoke Community Association
c/o New Toronto Initiative

cc: Councillors of City Council, Toronto Planning and Housing Committee, Toronto City Planning, TSSS, Local BIA