

Trevor Edwards
Resident, New Toronto

July 13 2025

City Clerk
Planning and Housing Committee
Toronto City Hall

Re: Item P23.3 – 66 to 66Y Third Street temporary-use rezoning (municipal shelter)

Dear Chair and Members of Committee,

Please place the following submission on the public record for the 15 July 2025 meeting. I understand that my submission, including any personal information I provide, will form part of the public record and may be posted online.

I contend that the temporary-use by-law proposed for 66 Third Street cannot lawfully proceed because the statutory notice is defective and Council's continued reliance on this site constitutes a failure of its duties in land-use control and fiscal stewardship.

1 Notice is defective

- A 1987 site-specific by-law confines the parcel to a municipal parking lot and leaves its base zoning as Commercial. Without a harmonising amendment under By-law 569-2013 the proposed shelter use is prohibited.
- The sign posted on 16 June 2025 states that a municipal shelter “is a permitted use under the existing zoning” and that the amendment addresses built form only. This misdescription nullifies the notice because it conceals both the commercial zoning and the need to legalise the use through the temporary-use power in Planning Act s. 39.
- An earlier rear-lot sign advertised 80 beds; the replacement front-lot sign advertises 50. Neither sign has ever provided a correct description of the zoning status. Accordingly, the statutory requirement for adequate public notice has not been satisfied.

2 Improper delegation and fiscal oversight

- Staff and the Toronto Parking Authority advanced a parcel whose prescribed commercial-parking use is incompatible with a shelter, and now seek to cure that conflict through an urgent s. 39 by-law rather than acknowledge the screening error.
- Capital estimates exceed \$30 million, while the operator has advised that—given a seniors focus—capacity may fall toward 30 cots. A ratio approaching \$1 million per bed is

incompatible with Council's duty of prudent financial management under City of Toronto Act s. 220 and the City's Long-Term Financial Plan.

3 Selection bias in surplus-lot criteria

The Parking Authority's revenue-loss screen designates low-revenue lots as "surplus." Because such lots cluster in lower-income wards like New Toronto, the process concentrates social-service facilities in South Etobicoke and contravenes the City's Equity Lens for Capital Investments.

Requested resolution

- 1.** Declare the statutory notice for 66 Third Street defective and void.
- 2.** Direct staff to re-examine the site-selection matrix—including the commercial-parking zoning, the 1987 by-law, and the equity implications of the surplus-lot algorithm—and to report within 90 days on alternative locations that permit a shelter use without reliance on s. 39 and that satisfy the Equity Lens.
- 3.** Suspend all capital and operating commitments for 66 Third Street until Council has reviewed that report.

Respectfully submitted,

Trevor Edwards
Resident, New Toronto