From:
To: Planning and Housing

Subject: [External Sender] 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

Date: July 14, 2025 5:58:31 PM

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Thank you for your acceptance of this revised communication to replace my previous one. As before, I would like to request that my comments be publicly visible, but that any personal identification like addresses and phone numbers remain private.

Dear Chair and Members of the Committee,

Thank you for the opportunity to respond and express my strong opposition to the City's application to amend the Official Plan and Zoning By-law for 66 Third Street, under item PH23.3.

Additionally, I wish to convey my opposition to the treatment of six sites as one agenda item. It undermines proper public consultation. To pool each distinct address and neighbourhood into one decision is unjustified and procedurally inappropriate.

I also want to acknowledge the many local businesses in the New Toronto area who share these concerns, but have felt unable to voice their opposition publicly. Some fear the potential impact on their customer base, and/or face policies that prevent them from speaking out. Others simply lack the time and resources to engage, as they are focused on keeping their businesses afloat in a challenging economy. Their silence should not be mistaken for support.

This proposal represents a fundamental departure from the planning intent of low-density residential zones, such as RD and RS under Zoning By-law 569-2013. Emergency shelters are institutional in nature, designed to operate 24/7 with on-site support services. These are not residential uses in the traditional sense—they are community services. Their inclusion in low-density residential areas undermines the stability and character that these zones are meant to protect.

At 66 Third Street, the site directly abuts sensitive land uses, including a seniors' residence and a single-family home. This raises serious land use compatibility concerns. A facility operating 24/7 introduces increased traffic from service providers and deliveries, higher levels of noise, more frequent garbage collection, bright exterior lighting and legitimate safety concerns—all of which go beyond the impact of typical residential use.

The proposed 9-metre separation from the seniors' building is not an adequate buffer. When communal outdoor spaces or delivery zones are placed within that space, it will offer little protection—either physically or visually—from noise and activity. This undermines the well-being of adjacent vulnerable residents.

There are also concerns regarding encroachment on setback norms. Emergency

shelters, by their scale and programmatic needs, do not meet the minimum side or rear yard setbacks required under current zoning. When the shelter is constructed too close to the single-family home, it will cast shadows, invade privacy, and conflict with established streetscape rhythm and massing.

Parking is another major issue. This shelter does not provide sufficient on-site parking for staff, service providers, and visitors, so the burden will fall on the surrounding streets. That means spillover parking in front of homes and the seniors' building, creating congestion and reducing access for emergency services and caregivers.

In summary, this proposal to amend City of Toronto Zoning By-law 569-2013 is not compatible with the low-density residential context of 66 Third Street. It introduces a use that is fundamentally different from what the zoning is meant to protect, negatively impacts adjacent sensitive uses, fails to provide appropriate buffering, may violate setback norms, and threatens to overburden local parking and infrastructure.

I urge the Committee to reject this blanket zoning amendment and instead pursue site-specific reviews that meaningfully involve impacted communities individually and according to their neighbourhood character.

Alternately, I urge the City of Toronto to treat homeless shelters not as residences, but as temporary emergency accommodations where unhoused folks can readily access supports and care in a timely manner, so that they may transition out and into affordable housing. I urge you to amend the criteria for shelters so that they can be built in areas undergoing high density development, and areas that prioritize employment opportunity. I believe it is the city's own limitations, and not the opposition of me and my neighbours which is preventing the timely construction of homeless shelters to address the crisis.

Finally, eliminating city councillors from the shelter site selection process to "solve" placement challenges is like removing referees from a game to speed up play. Sure, decisions might happen faster, but without oversight and local knowledge, the outcomes are unfair, chaotic, and ultimately harmful to everyone involved.

Councillors represent the communities most affected—they aren't obstacles to the process; they're essential to making it fair and accountable.

Thank you for including this letter on record in this matter.

