

Jean-Paul Morresi
54 Sixth St.,
Etobicoke, Ontario, M8V 3A2
jpmorresi@gmail.com
(416) 527-0248
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The Planning & Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

RE: Objection to the Proposed Zoning Amendments at 66 Third Street, Etobicoke (Agenda Item 23.3, July 15th, 2025)

To whom it may concern,

I am writing to formally object to the proposed development and zoning amendment that would allow for the establishment of a municipal emergency shelter for seniors at 66 Third Street, New Toronto.

The City of Toronto has publicly stated that it "has secured 66 Third St. for use as a municipal shelter that will provide critical services to help seniors experiencing homelessness move toward permanent housing." While I recognize and support the urgent need for transitional and supportive housing for vulnerable populations, including older adults, the proposed use of this specific site is inconsistent with Toronto's current zoning by-laws and raises significant concerns relating to land use conformity, operational feasibility, and procedural integrity.

1. Inconsistent Use Classification Under Zoning By-law 569-2013 The City's proposal refers to the site as a "municipal shelter," a use category formerly defined in Section 150.22 of the City-wide Zoning By-law 569-2013. However, that section has since been **deleted**, and no updated definition or performance standards for "municipal shelter" currently exist in the by-law.

The remaining regulated use category applicable to emergency housing is "Crisis Care Shelter," as defined in Section 150.20. However, the proposed shelter at 66 Third Street does not meet the applicable requirements:

- It is **not located on or within 80 metres of a major street** as defined by the Official Plan,
- It is **within 250 metres of another residential institution** serving vulnerable persons (a seniors residence),

- It does not conform to the intended scale or context of the surrounding Neighbourhoods designation.

Therefore, the proposal does **not conform** to either a currently defined use class under the zoning by-law nor the location-based criteria for a Crisis Care Shelter.

2. The Emergency Declaration Does Not Override the Planning Act While Toronto City Council declared homelessness an emergency in May 2023 and launched the Homelessness Services Capital Infrastructure Strategy, such a declaration does **not exempt** the proposal from compliance with the Planning Act or Zoning By-law 569-2013. There is no provision in the by-law, or in recent policy amendments, that allows the City to bypass zoning conformity based solely on urgency.

Emergency shelters that cannot meet zoning tests must be subject to a full rezoning application, complete with public consultation and the opportunity for appeal through the Ontario Land Tribunal.

3. The Proposed Site Is Inappropriate Based on Size, Location, and Infrastructure The proposed shelter is planned on a former parking lot, zoned under a legacy provision specifically restricting use to parking in support of nearby businesses. This lot:

- Is **situated on a narrow residential lane**, not a major street,
- Is **adjacent to a private single-storey bungalow and opposite a seniors' housing complex**,
- Lacks adequate space for necessary operational components, including commercial garbage bins, meal delivery logistics, and safe drop-off/pick-up areas.

Toronto Shelter Design & Technical Guidelines recommend sites with sufficient frontage, indoor/outdoor amenity space, privacy screening, and accessibility—criteria which 66 Third Street cannot meet.

4. Risk of Undermining Policy Consistency and Public Trust Approving this shelter at 66 Third Street through a non-transparent process and on a technically non-conforming site risks setting a dangerous precedent. It may:

- Weaken the enforceability of existing Zoning By-laws,
- Bypass legitimate procedural safeguards under the Planning Act,
- Undermine public trust in the shelter siting process,
- Validate efforts to resist transparency in the pursuit of ideological agendas,
- Amplify adversarial dynamics between city departments and community residents.

Request for Action: I urge the Planning Division and City Council to:

1. Require the City to submit a **complete rezoning application** for this site,
2. Initiate a full **planning and community consultation process** before advancing this proposal,

3. Direct staff to consider **alternative, properly zoned locations** with better infrastructure, scale compatibility, and service access for a seniors shelter.

This letter is submitted in the spirit of ensuring that shelter services for vulnerable individuals are implemented responsibly, sustainably, and in accordance with established planning frameworks, and with the hope that the suspect practices employed in attempting to bulldoze through approval of this site do not undermine one of the few functions of the city that continues to fulfill its intended purpose..

Respectfully,

Jean-Paul Morresi