

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

Re: Item PH23.3 Zoning Amendment Application for 66–66Y Third Street

Submitted by: South Etobicoke Community Association c/o New Toronto Initiative

To the City Clerk:

Please add these comments to the agenda for the July 15, 2025 Planning and Housing Committee meeting on item P23.3, Zoning Amendment Application for 66-66Y Third Street.

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.

Date: July 15, 2025

Subject: Strong Opposition to the Proposed Zoning By-law Amendment for 66–66Y Third Street

Mr. Chair, Members of the Planning and Housing Committee,

We are writing to express strong opposition, deep dismay and frustration to the proposed zoning by-law amendment for the property municipally known as 66–66Y Third Street, currently a small community parking lot, proposed to be converted into an oversized multi-storey homeless shelter.

This proposal represents a radical departure from the established zoning and character of the area. The sheer volume and scope of zoning by-law amendments required to permit this build should be seen as a clear red flag. This is, unequivocally, spot zoning.

The application is riddled with inconsistencies that challenge its validity. 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.

This application 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.

1. Unfair Social Infrastructure Burden on New Toronto

New Toronto already hosts a disproportionate share of subsidized and supportive housing.

- Over 64 percent of all RGI housing in South Etobicoke is located in New Toronto
- More than 27 percent of the overall rental housing stock in New Toronto is subsidized.
- 66 Third Street is the only proposed shelter site whose neighbourhood, New Toronto, has the lowest median household income, the largest proportion of low income residents and the highest percent of subsidized housing.

- All the other proposed shelter sites except one have subsidized housing less than their ward average. New Toronto's is 200% over our ward average

These figures far exceed citywide averages and those found in surrounding communities.

And yet, here we are, being told to carry more, with no recognition of the strain or any plan for balance. This plan is not only inequitable, it feels punitive. It reflects a disturbing pattern of offloading complex challenges onto marginalized neighbourhoods.

Siting a harm reduction shelter in New Toronto represents a deeply disproportionate impact on a lower-income area, and underscores significant issues of bias and discrimination by the City, reflecting systemic inequities and threatening the viability of our community.

2. Incompatible Land Use and Neighbourhood Character

The Shelter planned for 66 Third Street has been incomprehensibly sited in a dead-end corner of Ward 3, far from the center of the community it is supposed to serve, and which:

- Is home to single-family dwellings including a bungalow directly to the south
- Is immediately abutting Toronto Community Housing for seniors (Woods Manor),
- Is located beside a children's playground and wading pool,
- Lies within 250 metres of two schools and several daycares

This location lacks the scale, infrastructure, and traffic flow capacity for a 24/7 shelter facility, particularly one with harm reduction services. The proposed use raises legitimate concerns about community safety, congestion, and disruption to child-focused and senior-serving spaces.

The lot size does not support this intensity of development. This proposal sets a dangerous precedent for over-intensification without proper infrastructure or design mitigations. Nearby properties remain predominantly detached and low-rise, making this proposal feel abrupt and incompatible.

It's hard to comprehend how any planner could look at this context and conclude that a 24/7 shelter, with on-site harm reduction services and no parking or green space, is compatible. The proposal doesn't just disrespect the neighbourhood, it actively threatens its stability.

This development is not a modest infill. It is an aggressive urban institutional use being squeezed into a small neighbourhood lot with nearly every safeguard removed through zoning exceptions. It introduces use intensity and security concerns without a local consultation process or safety plan.

3. Failure to Meet the City's Own Shelter Guidelines

The City has not maintained its own standards in this application:

- The lot is under 10,000 square feet, less than one-quarter the size of lots used in the City's own shelter success stories
- At 9,246 sq.ft. it is well below the 15,000 sq.ft. standard recommended for emergency shelters
- It is the smallest site of all the shelter proposals and the only one situated on a small residential street
- Is the only shelter out of 6 that does not face an Avenue or Major Street
- This contradicts urban planning best practices for transitional housing.

This proposal appears to circumvent the City's own guidelines for size, context, and location suitability, which damages public trust and the likelihood of success for the facility itself. If the City can't follow its own guidelines, why should residents trust this process at all?

4. Land Use Conversion: From Community Parking Lot to Institutional Residential Use

What was once a vital Green P lot serving local seniors, families, and businesses is now being stripped away—not replaced, not relocated, just removed.

- **Current Use:** Donated in part by a local business to the City of Toronto for explicit use as a parking lot, the site serves as a local Green P, essential to the functioning of surrounding residential and community uses.
- **Proposed Use:** The amendment permits an apartment building, implicitly a supportive housing or shelter structure, not aligned with the original RM zoning.

Concern: The removal of 24 parking spots lacks any foundational support from Economic Development or the local BIA. Without empirical evidence backing such a drastic change, this decision is purely political, not based on sound planning principles. This is a fundamental change in use with no adequate assessment of community impact, safety, traffic, or long-term urban compatibility. This intensification is being pushed without proper planning study or local consensus.

5. Height and Density: Disproportionate to Local Context

A towering 25-metre building on a block of 1- and 2-storey homes is not just a planning misstep. It is an act of visual and spatial aggression.

- **Permitted Maximum Height:** Generally, 10 to 12 metres in this RM zone.
- **Proposed Height:** 20.0 metres, plus 5.0 metres of rooftop mechanicals and architectural structures, totaling a 25.0-metre visual envelope.

Concern: The building mass is scaled for a much larger lot, creating visual intrusion, privacy concerns, and setting a precedent for high-intensity uses on small, mid-block lots.

6. Setbacks: Zoning Non-Compliance and Overdevelopment

The structure is too large for the site. It represents an over-intensification that compromises fire safety and liveability. This proposal has zero privacy, zero greenery, and zero buffer for both the residents of the shelter and the neighbouring homes particularly the bungalow to the South.

- **Required Front Yard:** 4.5 metres, proposed at 0.0 metres.
- **Side and Rear Setbacks:**
 - East: Required 8.87 metres, reduced to 0.0 metres,
 - North: Required 8.87 metres, reduced to 0.0 metres,
 - South: Required 8.87 metres, reduced to just 1.0 metre,
 - West: Required 8.87 metres, reduced to only 7.5 metres (abutting Woods Manor)
- **Encroachments:** Balconies, patios, stairs, and canopies allowed to encroach up to 7.5 metres into required yards.

Concern: These reductions eliminate any meaningful buffer between the building and adjacent homes. Residents will face noise, shadowing, and a loss of privacy and property value. The proposal also includes insufficient (0) soft landscaping and the irresponsible removal of mature trees in a flood-prone area.

7. Lack of Parking, Loading, and Traffic Management

There is no parking for staff or residents and no loading zone for deliveries.

This shelter will require daily service, supervision, waste removal, emergency access, and more. Yet the site offers none of the infrastructure to support it.

- **Parking Requirements:** Eliminated for residents, visitors, and staff,
- **Loading Zones:** None provided,
- **Driveway Standards:** Ignored.

Concern: Parking pressures are compounded by both the loss of an existing Green P lot and the failure to plan for staff and resident vehicle needs. No accommodations have been made for onsite parking, increasing strain on a street already lacking capacity. This will generate spillover traffic and parking into residential streets already suffering from congestion.

8. Amenity and Green Space Deficiency

This facility provides the bare legal minimum - just 4 square metres of amenity space per resident, with a chunk of the required landscaping allowed to be pavement.

- **Amenity Space:** Minimum 4.0 m² per unit,
- **Landscaping:** Only 15 percent required, 7.5 percent can be hardscaped.

Concern: This is insufficient for vulnerable residents. There is no real outdoor gathering area, green space, or privacy.

9. Operational Deficiencies and Incompatibilities

Accessibility Constraints:

The proposed amendments focus narrowly on the building envelope, ignoring critical operational concerns. Even the Operator has publicly acknowledged unresolved issues with dorm-style rooms, overcrowded conditions for 50 residents, and insufficient space for programming. The design fails to account for accessibility needs, with inadequate turning radii for mobility devices, no parking for staff or residents, and an illogical four-storey form for a senior-focused facility. Siting a vertical shelter for vulnerable seniors with complex needs raises serious concerns. In an emergency, those reliant on mobility assistance would face extreme difficulty evacuating. A single-storey design would be far more appropriate and humane, minimizing reliance on emergency responders for safe egress.

Yet the City continues to push this shelter site through, despite other sites that would be better suited for a senior's shelter within Ward 3.

Waste Management Deficiencies:

The site design fails to meet basic waste management standards, with no adequate space for enclosed bins, poor truck turning radii, and unscreened waste storage facing Third Street, directly contradicting urban design guidelines that require screened, rear-located service areas.

Loss of Privacy and Quiet Enjoyment:

The proposed site is on a quiet residential street, not a main road or transit corridor. The City is imposing a high-impact facility in a low-impact neighbourhood, disrupting residents' right to quiet enjoyment and potentially triggering nuisance complaints and legal action. Woods Manor balconies will face directly onto the rooftop amenity space and be adjacent to noisy heating and cooling units. The rooftop deck will cast shadows over the backyard of the bungalow to the south. Additionally, the building's two-storey southern wall encroaches on the neighbouring driveway.

Harm Reduction Use Conflicts:

The absence of dedicated on-site outdoor space for supervised use will result in displacement of shelter resident activity into adjacent public lands, including Prince of Wales Park and the Trans Canada Trail, constituting a misuse of public space that contravenes both municipal shelter standards and established park use policies. Open drug use, discarded needles, passed out users, human waste, and condoms will compromise our waterfront access, undermining the City's own \$30M+ infrastructure investment to make it a safe, vibrant public space.

10. Destructive Impact on Local Economy

The proposal removes a Green P lot donated in part by a local business. This lot supports accessibility to Lake Shore Boulevard's shops and services. The broader plan to eliminate over 60 percent of New Toronto's parking threatens commercial viability and access for families, seniors, and those with mobility issues.

11. Concerns About City Process and Use of Zoning Amendments

The City appears to be using zoning amendments to override its own planning rules. This proposal would never be approved if submitted by a private applicant.

The architectural plans submitted are rudimentary at best, falling far short of basic professional standards for a rezoning application. These plans do not even align with the zoning bylaw in front of us. If submitted by a lay applicant, this would be swiftly rejected, yet staff are considering it for approval.

In fact, if the City were to be brought to Committee of Adjustment, this plan would fail the 4 tests:

1. Not Minor

- The sheer number and scale of required amendments (e.g., height, setbacks, parking, lot coverage, and use) are substantial and far exceed what could be considered minor.
- The intensity and scale of the proposal would have a significant and potentially negative impact on the surrounding low-rise residential community.

2. Not Desirable for Appropriate Development

- This development is fundamentally out of character with the surrounding area.
- It imposes institutional-scale massing and function in a modest, low-density residential zone, potentially disrupting the neighbourhood's livability and cohesion.
- It directly challenges the Lake Shore Boulevard West Avenues Study and efforts to attract commercial investment to New Toronto, posing serious risks to existing businesses, community safety, and long-term revitalization. No credible developer will invest in New Toronto under these conditions.

3. Does Not Maintain the Intent of the Zoning By-law

- The site is currently zoned for low-rise residential use. This proposal requires multiple exceptions to existing zoning standards to permit a shelter use, which is not normally allowed in this zone.
- The form, scale, and use contravene the purpose of the zoning, which is to protect the character and stability of the neighbourhood.

4. Does Not Maintain the Intent of the Official Plan

- The City of Toronto's Official Plan emphasizes context-sensitive infill, community consultation, and protection of stable neighbourhoods.
- This proposal, which seeks to override standard planning processes via spot zoning and group approvals, subverts the planning intent to ensure orderly, context-appropriate growth.

Instead, the City is attempting to legalize non-compliance. This practice sets a dangerous precedent that undermines planning credibility.

Furthermore, there was no equity analysis, no formal impact assessment and no formal consultations with adjacent residents or businesses. The performative consultation that did occur was also deeply biased and those running it were in a conflict of interest position. It is clear that shelter advocates manipulated the process and the selection decision had already been made before the so-called consultation had even begun.

The City's insistence on advancing this site, despite clear issues of compatibility, equity, and operational feasibility, suggests a predetermined agenda, one that appears more focused on proving a point and potentially overriding fair site evaluation processes, rather than on responsible, community-based planning.

Bypassing community input and zoning integrity is not good planning, it's not even good politics. It is imposition.

More than 2,700 residents voiced their opposition and rejection of the City's plans to erect a shelter in this parking lot in the enclosed Petition. We are not opposed to shelters, we are opposed to poor planning, double standards, bias, and discrimination of New Toronto.

12. Major Discrepancies between the Architectural Plans and the Zoning Amendments

The City appears to be unaware, or indifferent to, the fact that the architectural plans do not match the zoning amendments. The below table shows 8 ways the plans and amendments don't match:

Discrepancy	Architectural Plans	Zoning Amendments
Building Height	16.5m	20m
Mechanical Penthouse	TBD	5m
# of Storeys	4-storeys + a basement (5-floors)	Unlimited
Landscaping	Unknown %	15%
Amenity Space	482m ²	200m ²
Bike Parking	8 Spaces	2 Spaces
Density	2.03 floor space index	Unlimited
# of Beds	Approximately 50	50

The discrepancies between the architectural plans and the zoning amendments make it impossible for residents to know what the City exactly intends to build on 66–66Y Third Street. If the zoning amendments are approved, there would be nothing stopping the City from building a different homeless shelter than what is shown in the architectural plans. The City should at least be able to tell residents how tall, how dense, and how big this homeless shelter will actually be, which hasn't happened yet.

It is unfair for the City to hold consultations about a homeless shelter's design when the information provided to the public doesn't even reveal what the City's exact plans are for the property. The City needs to go back to the

drawing board and provide New Toronto residents with accurate information about how an oversized multi-storey homeless shelter will respect and reinforce the neighborhood's character.

In addition, as of July 11, Attachment 13: Draft Zoning By-law Amendment - 66-66Y Third Street has not been posted to the agenda denying proper notice and an adequate opportunity to review and respond to consistent, accurate plans. This lack of transparency leaves stakeholders in the dark, which is a serious breach of public trust in the planning process.

Conclusion and Request

It is alarming how quickly the City is willing to rewrite its own rules to suit its own purposes. If a private developer proposed this, on a lot this small, with this many bylaw violations, they would be laughed out of the planning department.

Instead of adhering to established planning principles and regulatory frameworks, the City appears to be rewriting the rules in real time. The proposal 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 proposed development at 66 Third Street is:

- Inappropriately scaled,
- Inconsistent with zoning,
- Incompatible with its surroundings,
- Unfair to the hosting neighbourhood,
- Harmful to both built form and local economy.

We urge the Planning and Housing Committee to:

- Reject the zoning by-law amendment,
- Conduct a proper community and planning impact study,
- Find a more suitable site that aligns with City guidelines,
- Ensure equitable distribution of supportive housing,
- Preserve essential infrastructure like public parking.

The Planning and Housing Committee must protect New Toronto's neighbourhood character, uphold planning principles, and resist using zoning amendments as a workaround for poor site selection.

This application fails that test.

Respectfully,

South Etobicoke Community Association c/o New Toronto Initiative

