

**Re: Rezoning Application – 3838 Bloor Street West**  
**To: Planning and Housing Committee**

Dear Planning and Housing Committee Members,

We are writing to formally object to the proposed rezoning of the property municipally known as 3838 Bloor Street West, currently under consideration by the City of Toronto.

This submission does not oppose the provision of shelter services as a public policy objective. Rather, it raises substantive planning, zoning, infrastructure, and process integrity concerns regarding the appropriateness of this specific site for the proposed rezoning and intensified institutional use.

Rezoning is a discretionary planning decision that must independently satisfy the City's planning framework, public interest, and long-term land-use objectives. Operational need or program urgency alone does not constitute sufficient planning rationale. In this case, the evidence available to date does not support approval.

**1. Land Use Context and Practical Intensity of Use**

The subject property is located along Bloor Street West at the edge of an established low-rise neighbourhood characterized by:

- Small-scale retail and service uses forming a pedestrian-oriented “main street”
- Low-rise residential dwellings and senior-oriented housing
- Schools, childcare centres, and other sensitive uses

While shelters are classified as a residential use under planning policy, from a practical and operational standpoint this proposal functions as a highly intensive institutional use. The proposed facility would accommodate approximately 65 residents, supported by staff, security personnel, service providers, deliveries, and continuous operations across multiple shifts. This level of intensity is a core concern. Compared to typical residential uses, the proposal introduces materially greater external impacts, including frequent coming and goings, service activity throughout the day, and operational pressures that exceed what the existing zoning framework was designed to manage on this site. Recognizing that shelters are permitted within neighbourhoods, the question before the Committee is whether this degree of intensification is appropriate on this specific lot, given its size, configuration, and surrounding context.

**2. Built Form and Massing Impacts**

Based on materials disclosed to date, the proposal contemplates a two-storey addition and substantial internal reconfiguration to accommodate increased occupancy. Even modest vertical expansion in a low-rise context will result in:

- Adverse shadowing impacts and loss of sunlight to adjacent properties
- Overlook and loss of privacy for adjacent residential properties
- Noise, activity, and operational pressure associated with high-intensity use
- Visual and functional dominance inconsistent with the prevailing low-rise character

Of particular concern is the rear yard condition. The site currently backs onto uses that generate minimal activity. Introducing a high-occupancy, 24-hour institutional operation immediately adjacent to nearby homes represents a localized but significant impact that has not been adequately addressed.

Toronto's planning framework requires intensification along main streets to demonstrate urban design excellence and sensitivity to context. To date, there has been no publicly demonstrated analysis showing that this level of built form and use intensity can be accommodated without undue impact. Operational need does not substitute for consistent urban design performance.

**3. Official Plan Consistency and Bloor Street Vision**

The proposal requires an Official Plan Amendment, indicating a fundamental policy inconsistency, not a minor technical adjustment. Within the City's Official Plan, Bloor Street West in this area is envisioned as a pedestrian-oriented corridor with an active, small-scale main-street character, including street-related retail and

community-serving uses. The proposed shelter, by its nature, is inward-facing and secure, offering limited public animation or engagement with the street.

The non-public, institutional frontage of the proposed shelter represents a material departure from the long-standing vision for this segment of Bloor Street. While small design accommodations may be proposed, these do not meaningfully replicate the role that commercial or publicly accessible uses play in supporting street vitality and livability. This is not simply a question of building size, but of land-use function and street relationship. The requested Official Plan Amendment would set aside planned objectives for this corridor in favour of a site-specific exception, raising broader policy concerns beyond this application alone.

#### **4. Parking, Access, and Transportation Deficiencies**

The site reportedly contains approximately five on-site parking spaces, with constrained rear access. This supply is insufficient to accommodate:

- Shelter staff across multiple shifts
- Service providers, caseworkers, security personal, and visitors
- Deliveries, waste collection and accessible drop-off/pick-up

There is also no realistic capacity for on-street or nearby public parking, given existing restrictions and neighbourhood constraints. From a practical standpoint, the community does not support absorbing this parking deficiency. More importantly, shelter workers, who are essential to the program's success, should not be penalized by inadequate planning or forced to compete for scarce residential parking due to zoning decisions.

This is a zoning matter. Expanding or intensifying a building without providing workable access and parking solutions is fundamentally ill-advised, regardless of technical minimum standards. Granting zoning relief in these circumstances would externalize foreseeable impacts and undermine livability objectives.

#### **5. Emergency Access and Servicing Concerns**

A high-occupancy shelter serving vulnerable populations requires reliable emergency access, clear service circulation, and secure pedestrian routing. While technical solutions may exist to address servicing constraints, these typically require significant capital investment. It remains unclear whether existing water, sanitary, stormwater, and emergency access infrastructure can support the proposed intensity without costly upgrades. Before rezoning is contemplated, the community should be provided with clear, transparent evidence that servicing capacity is adequate and a full accounting of associated public costs. Rezoning should not proceed on the assumption that problems can simply be "engineered away" at public expense.

#### **6. Loss of an Established Community-Serving Use**

Historically, the building functioned as a small-scale senior or assisted living facility, contributing to the City's stated objective of supporting residents to age in place. Rezoning would permanently eliminate this lower-impact, context-appropriate residential use in favour of a substantially more intensive institutional function. The City is, in effect, removing a needed community-serving residential use to introduce one that requires zoning relief, heightened operation oversight, and major reinvestment. This represents poor land-use efficiency and a net loss to the immediate community.

#### **7. Process Integrity and Premature Commitment, and Fairness**

Advancing acquisition and project planning prior to rezoning approval and meaningful public consultation raises concerns regarding:

- The perceived fettering of Council's planning discretion
- The credibility and legitimacy of the planning process and it creates a "decision-first, process-later" dynamic
- Public confidence in outcome-driven decision-making

Rezoning decisions must be made on planning merit, not as a ratification of operational decisions already taken. The current process followed, raises legitimate planning law concerns and weakens the City's position should the rezoning be appealed.

An additional concern relates to the City of Toronto's multiple and overlapping roles in this application. In this instance, the City is acting simultaneously as the property purchaser, project proponent, and planning authority

responsible for reviewing and recommending the rezoning, with City Council serving as the ultimate decision-maker.

Advancing property acquisition and detailed project planning prior to rezoning approval creates a reasonable perception that the planning process may be outcome-driven rather than evaluative, and that Council's discretion could be effectively constrained by prior financial and operational commitments. Even where no actual bias exists, the appearance of pre-determination risks undermining the credibility of the rezoning review and public consultation process. Given the discretionary nature of rezoning decisions, heightened care is required to ensure that planning analysis is demonstrably independent, policy-based, and not influenced, directly or indirectly, by the City's role as purchaser and developer. In the absence of such safeguards, proceeding with the rezoning risks compromising both procedural fairness and public confidence in the integrity of the planning system.

### **8. Treatment as a Central Rather Than Local Planning Matter**

Finally, it is notable that this application is being considered centrally rather than through the Etobicoke-York Community Council, where local expertise and democratic accountability are strongest. If this facility is characterized as a local service intended to support neighbourhood-based shelter distribution, it should be reviewed through the same local planning forum as other rezonings. Centralizing the decision limits effective community participation, particularly for seniors, working residents, and others for whom downtown attendance presents a barrier. This procedural choice reinforces the perception that the initiative is centrally driven rather than locally responsive.

### **9. Viable Alternative Uses and Locations**

If rezoning is refused, the existing building could continue to support uses far more compatible with its context, including:

- Seniors' housing or assisted living (restored or modernized)
- Community health or outpatient services
- Childcare or family support facilities
- Non-residential social or community services
- Transitional or supportive housing at a scale aligned with existing zoning

These uses preserve neighbourhood stability without major infrastructure investment. Moreover, the City should prioritize shelter development on sites that are:

- Already zoned for institutional or high-density mixed use
- Located within established service corridors
- Less constrained by access, parking, and servicing limitations
- Less costly to adapt and operate in the long term

Adaptive reuse should minimize planning conflict, not create it.

To conclude, for the reasons outlined above, the proposed rezoning of 3838 Bloor Street West is not supported by sound planning rationale. The cumulative deficiencies related to practical intensity, built form, Official City Plan conformity, parking, servicing capacity, process integrity and fiscal prudence warrant refusal or deferral of the rezoning application, irrespective of broader shelter policy objectives. The City can and should pursue shelter solutions that meet community needs without compromising planning principles, neighbourhood stability or procedural fairness. Planning decisions must still meet planning tests. This proposal, as currently advanced, does not.

Thank you for the opportunity to provide these comments. We request that this letter form part of the public record for this application.

Yours sincerely,

Wedgewood Neighbourhood Association Etobicoke

*Enclosed: Appendix A*

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### **Technical Questions for the Planning and Housing Committee**

#### *1. Land-Use Classification vs. Practical Intensity*

How does Planning staff reconcile the residential classification of the proposed shelter use with its practical operational intensity, including 24-hour staffing, service delivery, security, deliveries, and continuous comings and goings, when assessing land-use compatibility for this specific site?

#### *2. Site-Specific Suitability*

What site-specific characteristics (lot size, configuration, access, adjacency to sensitive uses) support accommodating a high-occupancy, institutional residential function at this location, as opposed to other sites already zoned for institutional or high-density mixed use?

#### *3. Precedent and Policy Integrity*

How will the City ensure that approving a site-specific rezoning and Official Plan Amendment at this location does not establish precedent for similar intensifications along Bloor Street where main-street parcels directly abut stable residential areas?

#### *4. Official Plan Amendment Justification*

What specific Official Plan policies are not met by the current designation, necessitating an Official Plan Amendment, and how does the proposed amendment align with the long-term vision for Bloor Street West as articulated in the Etobicoke Centre Secondary Plan?

#### *5. Street-Related Uses and Public Realm Function*

Given the Official Plan objective for an animated, pedestrian-oriented main street along this segment of Bloor Street, how does a largely inward-facing, secure institutional use satisfy policies intended to promote active street frontage and community life?

#### *6. Built Form and Transition Analysis*

Can Planning staff confirm whether the proposed addition and resulting built form comply with applicable angular plane, stepback, transition, and overlook policies, and provide the detailed analysis supporting the conclusion that both building form and intensity of use are appropriate in this context?

#### *7. Intensity-Related Impacts (Beyond Height and Density)*

How has Planning staff assessed the cumulative impacts of population density, operational activity, noise, and service frequency associated with the proposed use, particularly with respect to rear-yard adjacency and nearby low-rise residential properties?

#### *8. Parking Supply and Operational Reality*

How does the proposed development functionally support the parking and access needs of staff, service providers, deliveries, and accessible drop-off given the limited on-site supply, and what planning rationale supports proceeding with a rezoning that relies on off-site or undefined parking solutions?

#### *9. Spillover Mitigation and Enforceability*

What enforceable mechanisms will be implemented to prevent parking, loading, and service spillover onto surrounding residential streets, and how will compliance be monitored over time under the proposed zoning permissions?

#### *10. Emergency Access and Servicing Capacity*

Have emergency access, servicing, and circulation studies been completed to confirm that fire, police, ambulance, waste collection, and deliveries can operate safely and reliably on this constrained site at the proposed intensity, and will these analyses be made publicly available?

#### *11. Infrastructure Upgrades and Public Cost Exposure*

What infrastructure upgrades (water, sanitary, stormwater, access) are anticipated to support the proposed rezoning, and how will these be funded? How was cost efficiency considered in site selection?

#### *12. Loss of Existing Community-Serving Residential Use*

What planning consideration has been given to the elimination of an existing low-impact seniors or assisted-living residential use, and how does this outcome align with the City's objectives related to aging in place and housing diversity?

*13. Timing, Pre-Commitment, and Planning Discretion*

Why did the City proceed with property acquisition, capital investment, and shelter planning prior to securing zoning and Official Plan approvals, and how does Planning staff ensure that Council's discretion on this rezoning is not constrained by prior financial or operational commitments?

*14. City's Multiple Roles and Process Fairness*

Given the City's simultaneous role as purchaser, project proponent, planning authority, and decision-maker, what safeguards are in place to ensure the rezoning review is demonstrably independent, policy-based, and not perceived as outcome-driven?

*15. Local vs. Central Review Process*

What was the planning rationale for advancing this application through a central committee rather than the Etobicoke-York Community Council, and how does this approach support meaningful local participation and context-sensitive decision-making for an area-specific rezoning process?