



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

**PH30.3 - 3838 Bloor Street West - Official Plan and Zoning By-law Amendment
Application - Decision Report - Approval**

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-led organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

Position

More Neighbours Toronto supports this Official Plan and Zoning By-law Amendment. The site has a mixed use land use designation, within a Centre, and within a Protected Major Transit Station Area, which are all designated as growth areas in the Official Plan. An increase in height and density is completely appropriate in this location.

Given the overlapping policies encouraging growth, it is unfortunate that the building was not already allowed as-of-right, and that the site continued to be subject to the former Etobicoke Zoning Code. The rezoning application added unnecessary staff time and cost to the City's shelter project, both to prepare and review the rezoning application.

The need for an Official Plan amendment also demonstrates an ongoing issue with the use of Secondary Plans in Toronto. The Etobicoke Centre Secondary Plan, like all other Secondary Plans, takes priority over other Official Plan policies. There is also no set update timeline for Secondary Plans to ensure they remain consistent with Official Plan updates over time.

Secondary Plans can therefore become an impediment to City Council approved general policies, as was the case here. An Official Plan amendment was required to revise the Etobicoke Centre Secondary Plan to allow for a shelter on this site, which also adds time and cost to the shelter project. This is despite a multi-decade attempt by City Council to make it easier to construct municipal shelters.

The proposed use of a holding provision for this application is confusing and hopefully unnecessary. The staff report states that the development will only add nominal flows to a sewer that had pre-existing capacity constraints. The applicant is acting on behalf of the City of Toronto to develop a shelter that the City of Toronto wants and needs. Surely the City should not prevent itself from beginning to develop the site until after infrastructure upgrades are operational. There must be a better way for the City to coordinate with itself than a holding provision.

More Neighbours Toronto supports the City's Homelessness Services Capital Infrastructure Strategy. The City desperately needs more shelter spaces. We hope that the Planning and Housing Committee and City Council approve this item and that this shelter can begin construction as soon as possible.

We also hope that this item demonstrates the need for wider reform in the City's land use policies and procedures. Shelter project budgets and City staff time are not unlimited resources and delays hurt our most vulnerable residents. Time and money spent on the City submitting zoning and Official Plan amendments to itself for review are time and money not spent on creating more shelter spaces. Every day added to project schedules for procedural hurdles is an extra day people spend without shelter. We encourage the Planning and Housing Committee to work towards a future where items like this are no longer necessary.

Regards,
Damien Moule,
More Neighbours Toronto