



DEPUTATION

To: Planning and Housing Committee.
Date: May 5, 2025.
Re: PH30.3 – 3838 Bloor Street West – OPA/ZBA Application.

The Toronto Alliance to End Homelessness (TAEH) is a community-based collective impact initiative committed to ending homelessness in Toronto. Our network includes non-profit organisations that support those living with homelessness and those who are housed and who must spend a disproportionate amount of income on housing, as well as affordable and supportive housing developers, property managers, and landlords.

As part of our mission, TAEH works directly with the City of Toronto in its mandates surrounding homelessness and maintaining and growing affordable housing stock in the city, including engagement on client support services and funding. This includes TAEH co-chairing the Toronto Housing and Homelessness Service Planning Forum with both Toronto Shelter & Support Services and the Housing Secretariat. The TAEH also serves as the non-Indigenous Community Advisory Board on housing and homelessness for the City of Toronto. This means that we convene and coordinate the diverse range of homelessness service and housing providers in order to strategically inform City planning and policy on issues related to homelessness.

TAEH fully supports the position taken by the Interim Director of Development Review, recommending approval of the Official Plan Amendment (OPA) and the Zoning By-law Amendment (ZBA) being requested by the applicants. This shelter advances the goals of the Homelessness Services Capital Infrastructure Strategy (HSCIS) in general, and TAEH believes that the proposal balances the interests of the current residents and the planned future residents as per the *City Housing Charter*:

Regardless of whether they rent or own a home, *or are homeless*, all residents have *an equal stake and voice* in Toronto's future *and to effective participation* in decisions and policies affecting their communities and their housing. (Emphasis added).

This shelter will also advance the City's goals regarding supporting homeless women in Toronto, whose current life expectancy is 36 compared to 50 in the male homeless population. Likewise, these amendments will ensure that the site in the future can be converted into supportive or deeply affordable housing once the homelessness crisis ends.

Notwithstanding this support in relation to the general and specific goals of the HSCIS, TAEH recognises that this application must be considered in relation to the parameters laid

out in the *Planning Act*. TAEH agrees with Development Review concerning the requested amendments, that the nature of the proposed OPA conforms to the Official Plan's (OP) housing policies, and that the OPA also conforms with the OP and the Etobicoke Centre Secondary Plan in relation to its built form. TAEH notes that the proposed height of the building, four storeys, is lower than the permitted maximum height of 27m on the Mixed Use portion of the site, and is consistent with the permitted height for apartment buildings on the Neighbourhoods portion of the site (6 storeys, 19m).

In relation to the former portion, TAEH also notes that since the site is within the Kipling Station Protected Major Transit Station Area (PMTSA), the City is required to permit heights up to 20 storeys, or 65m. As such the lower than permitted as of right height being proposed needs to be recognised when considering community concerns regarding height and shadow. TAEH notes that privacy concerns related to the residential portion of the proposal are vitiated by the design elements of no windows on the east or west side elevations and light wells without direct overlook.

In light of community concerns it is important to recognise that:

“As per By-law 2003-0138, a municipal shelter is a permitted use under the existing zoning on the subject site ***and is compatible with surrounding commercial and residential uses.***” (Report for Action, page 9, emphasis added).

TAEH understands that the proposed OPA is being made out of an abundance of caution to remove the requirement for grade-related retail use, notwithstanding that the proposed community space at grade meets the intent of the OP.

Likewise TAEH notes that it is of interest that the pre-existing use of this site was as a nursing home. Many of the concerns raised by the community engagement process would have applied equally to that use, and as such TAEH believes that such concerns are not significant in nature, not being novel consequences of the proposed OPA and ZBA. TAEH also recognises that the site is within the Kipling Station PMTSA, and as such there are no parking minimums in any event. Finally, TAEH notes that the draft ZBA includes a holding provision that will ensure that any new municipal infrastructure or upgrades to existing infrastructure required by this development will be satisfied, which takes into consideration additional community engagement concerns.

Thank you,



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