

PH17.2 - Expanding Housing Options in Neighbourhoods - Neighbourhood Retail and Services Study Phase Two Final Report

December 5, 2024

Attention: Nancy Martins

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Email: phc@toronto.ca

Cc: councillor_perks@toronto.ca; councillor_bradford@toronto.ca; Councillor_Kandavel@toronto.ca; councillor_matlow@toronto.ca; Councillor_Myers@toronto.ca; councillor_nunziata@toronto.ca; Kyle.Knoeck@toronto.ca; Caroline.Samuel@toronto.ca; Michael.Noble@toronto.ca; Candace.Safonovs@toronto.ca

RE: PH17.2 - Expanding Housing Options in Neighbourhoods – Neighbourhood Retail and Services Study-Phase Two Final Report

Dear Councillor Gord Perks, Chair, and Members of Planning and Housing Committee,

Thank you for this opportunity to comment on **PH17.2 - Expanding Housing Options in Neighbourhoods – Neighbourhood Retail and Services Study- Phase Two Final Report**:

“This report recommends approval of zoning by-law amendments (ZBLA) to permit certain small-scale retail, service and office uses on Residentially-zoned properties within Neighbourhoods city-wide, and to update home occupations permissions in all areas. The ZBLAs provide for a more extensive list of permitted uses on major streets and more limited permissions on streets in the interior of Neighbourhoods. Changes are also proposed to home occupations permissions in all areas.

The focus of the proposed changes are to provide a city-wide policy environment that is more supportive of local businesses and services, allowing the flexibility for different communities to evolve in their own ways”.

Attachment 1: Draft Zoning By-law Amendment: Commercial Use Permissions in the Residential Zone
Category <https://www.toronto.ca/legdocs/mmis/2024/ph/bgrd/backgroundfile-250838.pdf> namely specifies:

“Explanatory Comment: Section 5 below contains the conditions that would apply to a more limited range of commercial uses permitted to be located on corner lots or adjacent to parks or non-residential zones in the R Zone. pg,1

...(ii) a lot abutting a park or a public school that fronts on the same street pg. 4,10,16,22, 28”

Considering what we know today about critical importance of our parks, urban biodiversity and relationship of nature deficit and mental health, a presumption in this Report that commercial uses are somewhat less

impactful if ***“a lot abutting a park ...that fronts on the same street”*** seems not giving a proper consideration to the Official Plan Environmental Policies and not even sitting well with the rules for green spaces in general.

Some small commercial uses perhaps fine adjacent to the parks, while others may create disturbance for parks visitors enjoyment. Where commercial uses should abut natural parks, protected as the ESA/ANSI, a special set of policies applies which policy acknowledgment is missing here.

This Report lists supportive policies under LEGISLATIVE AND POLICY FRAMEWORK that *“would create the flexibility to allow these retail, service and office uses to be established and preserved in Residential Zones”*, while it may not give a proper consideration to other equally important relevant policies and goals.

How to Read the Provincial Planning Statement <https://www.ontario.ca/files/2024-10/mmah-provincial-planning-statement-en-2024-10-23.pdf>

“The provincial policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic, health and social factors in land use planning. The Provincial Planning Statement supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.

The Provincial Planning Statement is more than a set of individual policies. It is to be read in its entirety and the relevant policies are to be applied to each situation. When more than one policy is relevant, a decision-maker should consider all of the relevant policies to understand how they work together.”

Nowhere in this Report, as much as along the past proposed housing initiatives, a proper consideration is given to how the changes proposed may impact the city protected natural heritage, tree canopy, backyard biodiversity, green spaces, etc. Missing is mention to the policies relevant to the city protected natural heritage, adopted into City Official Plan. Also left out is how densification, adopted into the changes of the Official Plan planning policies, will impact our green spaces availability, especially in the city central areas, since there is no interrelation between housing initiatives with the Parkland Strategy, Ravine Strategy, Biodiversity Strategy and the OPA 583 Environment and Climate Change Official Plan Policy Updates focused legislature and initiatives.

Request

That the City Council considers directing of the City Planning to report back on the overlaps and interrelationships of the EHON and related initiatives (such as Neighbourhood Retail and Services, Avenues, Major Streets, Mid-Rise) both at a policy level, and by application in the geography of the City, and the status of each.

Specifically to allow for a review for consistency and conformity with the planning policies guiding natural heritage and biodiversity in the city. Another part of this review should be a study of carrying capacity of city green spaces in co-relation to increased density resulting from housing initiative.

Yours sincerely,

Lenka Holubec, member [ProtectNatureTO](#)

Background:

[OPA 262](#) PG7.2 - Official Plan Five Year Review: Final Recommendation Report - Amendments to the Official Plan Environmental Policies and Designation of Environmentally Significant Areas, 2015

[Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates](#)

OPA 583 Official Plan Amendment 583, Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates Date: May 11, 2022

The City of Toronto has a strong legacy of introducing leading-edge policies that protect the natural environment, support and enhance biodiversity, and address climate change.

Addressing the dual crisis of climate change and biodiversity decline, along with other environmental concerns extend beyond this Official Plan update

[Toronto Official Plan, CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO, December 2023 Consolidation](#)

“The natural heritage system is important to the City, both within and beyond our boundaries, and needs to be protected for the long term.” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-43

“Protecting Toronto’s natural environment and urban forest should not be compromised by growth, insensitivity to the needs of the environment, or neglect. To this end, proposals for new development may need to be accompanied by a study assessing their impact on the natural environment.” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-44

“Biodiversity refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. **Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto. The biodiversity found in small green spaces, street trees, green roofs, community gardens, hydro corridors, cemeteries, and backyards also play an important role in our urban ecosystem.**” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-45