

PH17.2 - Expanding Housing Options in Neighbourhoods - Neighbourhood Retail and Services Study Phase Two Final Report_Lenka Holubec2

December 17, 2024

Attention: Sylwia Przedziecki, City Clerk

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

Email: phc@toronto.ca

Cc: mayor_chow@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 Mayor Olivia Chow and Members of City Council,

This is to expand on previous comments submitted (December 5, 2024) E-mail from Lenka Holubec (CC.Main)
<https://www.toronto.ca/legdocs/mmis/2024/cc/comm/communicationfile-185466.pdf>

Dec 12 Special Meeting and the follow up **Report Expanding Housing Options in Neighbourhoods: Neighbourhood Retail and Services Study Phase Two - Supplementary Report, Date: December 16, 2024**

<https://www.toronto.ca/legdocs/mmis/2024/cc/bgrd/backgroundfile-251599.pdf> has not in any way clarified that the city adopted environmental policies, relevant and mandatory under the specified range of circumstances, including this Report, will be applied to ensure conformity with City Official Plan.

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, including the city adopted Environmental Policies, and in respect to 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. The neighborhoods, situated in adjacency to the Environmentally Significant Areas (the ESAs) and the Areas of Natural and Science Interest (ANSIs) is where environmental policies apply as well, in case that there is a proposal coming along housing initiatives, HAPA, EHON, including PH17.2 ...Neighborhood Retail and Services Study.

Yours sincerely,

Lenka Holubec, member [ProtectNatureTO](#)

Important ramifications of PH17.2 ... Neighborhood Retail and Services Study in respect to proposals in adjacency of the ESA/ANSIs

The neighborhoods, major streets, etc. situated in adjacency to the Environmentally Significant Areas (the ESAs) see the MAP: https://www.toronto.ca/wp-content/uploads/2019/06/987b-cp-official-plan-Map-12A_ESAs_AODA.pdf and the Areas of Natural and Science Interest (ANSIs) see the Map https://www.toronto.ca/wp-content/uploads/2019/06/98a0-cp-official-plan-Map-12B_PSWs_ANSIs_AODA.pdf are where environmental policies apply as well, in case that there is a proposal coming along housing initiatives, HAPA, EHON, including PH17.2 ...Neighborhood Retail and Services Study.

This evaluation (Natural Heritage Impacts Study –NHIS) of direct, indirect and cumulative impacts of proposals on protected natural heritage adjacent (abutting) maybe needed. As an example, bars, patios, a larger retail stores, located in adjacency (within 120 as per Natural Heritage Reference Manual, 2010) of the ESA/ANSI with permitted consumption of alcohol would introduce human traffic, noise, light disturbance, pets, trampling, barriers to wildlife connectivity, etc.

In urban context, indirect cumulative impacts, resulting from the adjacent development or site alteration are very significant threat to natural heritage features and ecological function via increase use, disturbance, noise, lights, introduction of more pets.

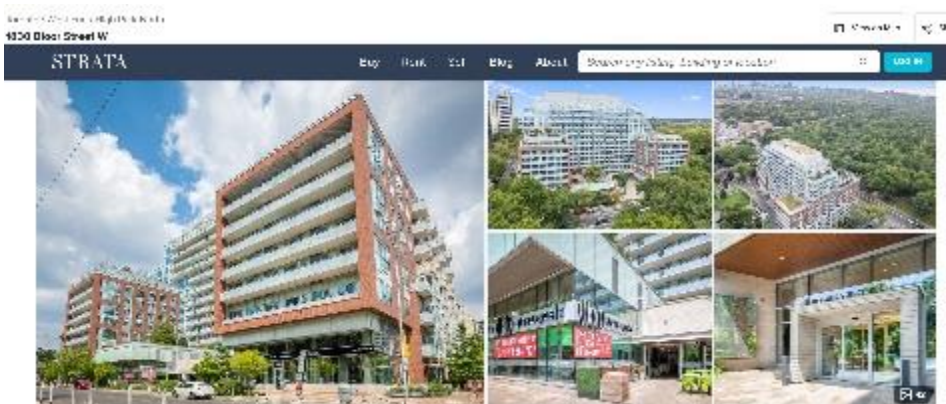
This is relevant and mandatory along any changes regarding proposals adopted by City Council dealing with housing initiatives, such as EHON, HAPA including PH17.2 - Expanding Housing Options in Neighbourhoods - Neighbourhood Retail and Services Study Phase Two Final Report

The city has expanded its environmental protection laws by adopting [OPA 262](#) (approved by the Province in May 2016). The OPA 262 is in full force and effect. Now in the text of consolidated Official Plan.

This process was concluded by Our Plan Toronto: Official Plan Environment and Climate Change Update, The Official Plan Amendment 583 (OPA 583) Change Official Plan Policy Updates <https://www.toronto.ca/legdocs/mmis/2022/ph/bgrd/backgroundfile-225897.pdf>

OPA 262 came with designating most of the Environmentally Significant Areas (the ESAs) https://www.toronto.ca/wp-content/uploads/2019/06/987b-cp-official-plan-Map-12A_ESAs_AODA.pdf while the ANSI (the Area of Natural and Scientific Interest) were designated by the Province earlier.

Retail store, patio, eating establishment can affect significantly protected natural area across a street:



RABBA 24/7 retail store across of High Park mostly designated as the ESA/ANSI

3.4 Natural Environment (City Official Plan, June 2024 consolidation) <https://www.toronto.ca/wp-content/uploads/2023/10/95f7-city-planning-official-plan-chapter-3.pdf>

15.

c) only permitting development or site alteration in the following locations if it has been demonstrated, through a study, that there will be no negative impacts on the natural features or the ecological functions for which the area is identified:

...

iii. in or on lands adjacent to provincially significant areas of natural and scientific interest, woodlands, valleylands and wildlife habitat; ...

[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: Official Plan Environment and Climate Change Update

The Official Plan Amendment 583 (OPA 583)

<https://www.toronto.ca/legdocs/mmis/2022/ph/bgrd/backgroundfile-225897.pdf>

New policy encouraging development adjacent to the Natural Heritage System to provide natural landscaped surfaces that increase the ecological function and/or biodiversity (2.3.1 Healthy Neighbourhoods)

Updates policy recognizing the risks associated with extreme heat (3.4 the Natural Environment), and recognizing the need for shade to ensure pedestrian comfort on City streets (3.1 The Built Environment)

Refined policy to prioritize green infrastructure when protecting the health of natural ecosystems (3.4 The Natural Environment)

Refined policy to promote ecological and hydrological connectivity (3.4 The Natural Environment);

- Refined non-policy text to integrate the tree canopy targets (3.4 The Natural Environment)
- New policy encouraging development to demonstrate a net increase in ecological function on development sites within contributing areas identified on Map 9A (3.4 The Natural Environment);
- Added reference to the Biodiversity Strategy within sidebar text (3.4 The Natural Environment); and
- New policy to consider Great Lakes Strategy, and Great Lakes Protection Act when undertaking watershed and /or waterfront planning (3.4 The Natural Environment).

“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