



**MORE NEIGHBOURS
TORONTO**

Dear Planning & Housing Committee,

**Re: 2024.PH12.4 - Expanding Housing Options in Neighbourhoods -
Neighbourhood Retail and Services Study Phase Two Proposals Report**

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-only 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 enthusiastically supports the expansion of legal home occupations in residential zones along Major Streets. A humble home garage or corner store beginning is the story of many now-successful businesses and resilient businesses in small towns. Our zoning has restricted this type of entrepreneurship for too long and unshackling it would not only help restore polycentric, self-reliant communities to amalgamated Toronto, but it would create the sort of vibrant life needed to sustain them and bring or retain more neighbours. I will be speaking to some of the home occupation types I have the most familiarity with, as I can give the most robust feedback on those.

Firstly, we applaud the addition of the Eating Establishment, Take-out Eating Establishment, Outdoor Patio uses and the expansion of the Retail Store use to residential zones. These are important uses for the City to legalize as labour has increasingly become tied less to place and more reliant on supply chains heavily mediated by monopolistic vehicle-for-hire or non-postal delivery-for-hire services (e.g. Amazon, Uber (Eats), SkipTheDishes). Residents and workers would have more opportunities for local and small businesses to pop up in close proximity to where people will live and work on Major Streets and provide competition against these larger actors. The inclusion of automated banking machines in these regulations may also help people more equitably access banking in closer reach.

Furthermore, food and restaurant-related uses also allow for the proliferation of much-needed third spaces for social interaction and the establishment of community ties while expanding the reach of the greatly successful CafeTO program. In conjunction with encouraging cycling, these reforms would lead to positive feedback cycles of higher pedestrian traffic for businesses and neighbourhoods and place more “eyes on the street” as a deterrent to crime.

We also welcome the harmonization of eating and entertainment distinctions in RAC zoning in keeping with the Night Economy By-Law 1329-2023. It reduces complexity for operators of night economy venues and allows more communities a bustling night life beyond 9 pm.

Secondly, the inclusion of the Art Gallery and Performing Arts Studio uses is also noteworthy. It would allow for more independent, informal or lower-cost arts venues and unbind cultural institutions and dissemination from high-cost buildings that can only be afforded or maintained by the richest or most dominant of actors in the artistic world (e.g. independent opera venues vs. Sony Centre for the Performing Arts, Koerner Hall).

Thirdly, these amendments resolve some major criticisms of specific built forms: while townhouses, or RT zoning, constitute a form of gentle density; townhouse blocks and subdivisions have been perceived to nullify non-residential uses within their bounds and this has likely contributed to gentrification in the past. Undoing this is a great first step to making this built form more amenable to small neighbourhood retail. Expanding home occupations to “ancillary buildings” (e.g. laneway or garden suites) is also a great equity-enriching policy in keeping with the mission of EHON.

I would like to conclude this letter by reminding the Planning & Housing Committee that allowing more diverse uses as-of right in residential zoning also eases the financial viability of housing stock held, to be acquired or built by affordable and non-profit housing providers. Retail often acts as a profitable land use that can offset expenses from other socially beneficial, though loss-sustaining initiatives such as community gardens or rental relief programs.

This is equally true for investor-occupiers, who would be empowered by retail permissions to upzone their homes into retail and then some residential units and more easily pay back those costs in an economically perilous time for construction starts. In essence, these new permissions retroactively make the previous EHON initiatives for laneway and garden suites as well as those for multiplexes accessible to more Torontonians.

Sincerely,

Thaddeus W. Sherlock
More Neighbours Toronto