

Proposed Bylaw Amendment to Provide Access to Social Infrastructure

Date: May 13, 2025
To: City Council
From: City Manager
Wards: All

SUMMARY

In December 2024, City Council directed the City Manager in consultation with the City Solicitor, applicable City divisions, the Toronto Police Service and other applicable stakeholders, to report to City Council in the first quarter of 2025, informed by public consultations and a constitutional legal expert opinion on the Charter Rights implications from the City Solicitor, with a proposed bylaw, with an emphasis on protecting vulnerable institutions such as places of worship, faith-based schools and cultural institutions, that supports the City's commitment to keeping Torontonians safe from hate and protects Charter rights that address impacts of demonstrations that target people based on their identity as prohibited under the Ontario Human Rights Code.

Since that time, staff have been advancing work on a proposed bylaw in response to Council direction. The City Manager's Office and Legal Services worked closely together, in consultation with the Toronto Police Service, and informed by feedback from City divisions with applicable subject-matter expertise, such as Corporate Real Estate Management (Corporate Security), Municipal Licensing and Standards, Social Development, Strategic Public and Employee Communications, and Transportation Services. City staff were mindful of the various needs and priorities in undertaking this work, including respecting Charter rights, applying a reconciliation and equity lens, keeping Toronto safe for all, and taking a balanced and measured approach that considers all diverse perspectives and options to respond to Council's direction and support informed decision-making.

City staff conducted a jurisdictional scan reviewing applicable bylaws and legislation to support the development of a proposed bylaw. A literature search was also conducted to identify relevant and available research to support City staff's work. Additional factors unique to Toronto that were considered include the City's sprawl and density, its built environment including public right-of-way widths, the City's role in bylaw administration and enforcement, and Toronto's diversity.

The City undertook a multi-pronged approach for public consultation to maximize opportunities for public input and enable broad participation and inclusive representation. The consultation approach prioritized inclusivity, safety, access and privacy. Third-party consultant services were procured to support the consultation and facilitate the comfort and safety of all participants in providing input to the City. The consultation gathered input and feedback through the following methods:

- Survey: an anonymous online survey was available between March 17, 2025 and May 1, 2025
- Written Submissions: comments via email were accepted between March 17, 2025 and May 1, 2025
- Public Sessions: two virtual public sessions took place on April 22, 2025 and April 30, 2025
- Community-Focused Discussion Sessions: small group discussions took place with individuals from and organizations representing Indigenous, Black, equity-deserving groups, 2SLGBTQ+, racialized communities, newcomers, youth, seniors, as well as legal and civil liberties groups, human rights organizations, faith-based groups, environmental sector, unions and labour organizations, public transit and climate justice advocates

Key themes from the public consultation included:

- Polarization of opinion in terms of strong support for or strong opposition to a potential proposed bylaw
- Concern about potential infringement of rights protected under the Canadian Charter of Rights and Freedoms
- Support for demonstrations in Toronto
- Ability for the City to explore and/or utilize other existing enforcement tools to address concerns about demonstrations
- Lack of clarity around the definition of “vulnerable institutions”

Based on learnings from the jurisdictional scan, research and diverse feedback received through the public consultation process, City staff recommend amending the Streets and Sidewalks Bylaw to include new provisions as outlined in Attachment 5. The proposed bylaw amendment affirms that the City’s streets and sidewalks are for all, and that residents should not be impeded from access to social infrastructure and its programs and services. The proposed bylaw amendment leverages and builds upon an existing City bylaw to ensure access to social infrastructure by prohibiting certain activities and conduct on City property.

The proposed bylaw amendment would direct staff to establish an Access Area prohibiting specific behaviours which prevent access to prescribed Social Infrastructure for a 180-day period upon a request from the Owner (property owner or operator) that meets listed criteria. By scoping the application of the proposed bylaw amendment to specified locations where prohibited actions have occurred and times in relation to the locations' operations, the bylaw amendment aims to protect access to the Social Infrastructure while limiting the potential impairment on Charter rights.

A request-based approach would enable Owners of specified locations to request an Access Area, in which prohibitions under the proposed bylaw amendment would apply to respond to access barriers and mitigate impacts on the community, based on the

circumstances at a point in time. The proposed bylaw amendment would apply to prescribed Social Infrastructure, defined as a Childcare Centre, a Place of Worship or a School, to mitigate barriers to access where identifiable communities and children (i.e. minors) gather.

An established Access Area would cover any City property that is within 20 metres from the boundaries of the property on which the prescribed Social Infrastructure is located. The 20-metre distance reflects consideration of a reasonable perimeter that achieves the intended objective of protecting access to the prescribed Social Infrastructure, while being minimally impairing on Charter rights and operationally practicable in relation to Toronto's built environment.

Should Council adopt the proposed bylaw amendment, it could provide Bylaw Enforcement Officers supported by Toronto Police Service with an additional mechanism to assist them in enabling safe access to social infrastructure. As part of an education-first approach, the proposed bylaw amendment could also be used as an educational tool to promote proactive and voluntary compliance.

The proposed bylaw amendment also contains a provision requiring that enforcement staff would provide notice of bylaw contravening activity prior to laying any charges. This would allow persons to voluntarily comply with the bylaw prior to being subject to any further enforcement action.

The bylaw would permit Bylaw Enforcement Officers to escalate from education to enforcement when education has not been effective in stopping the prohibited activities. Further, with a clear statutory prohibition in place, police would be able to utilise the Trespass to Property Act more easily.

If adopted by Council, the City Manager's Office will support Transportation Services to administer the proposed bylaw amendment as part of the transition to prepare for the new bylaw provisions coming into effect. Transportation Services will be responsible for the administration of the proposed bylaw amendment, including the intake, processing and review of requests, liaison with stakeholders, complaints/appeals process and public notice requirements.

This report recommends the proposed bylaw amendment come into effect on July 2, 2025. If adopted by Council, as of July 2, 2025, the City will begin accepting requests for Access Areas. Information on the request process will be communicated as part of the public education, communication and outreach campaign as recommended below.

To ensure the public is aware, understands the new regulations that would be coming into effect and how the bylaw would be enforced, a comprehensive multi-lingual public education and communications campaign, in collaboration with the Toronto Police Service, is recommended. The Customer Experience Division would also be engaged to ensure residents are provided with the required information and assistance through 311 Toronto.

Targeted engagement and outreach to Owners of the prescribed Social Infrastructure will be conducted to ensure they understand the bylaw's application and request process for an Access Area.

Through the public consultation process and directed engagement with Indigenous, Black and equity-deserving communities, the City received feedback expressing the critical importance of demonstrations and the potential negative impact on freedom of expression and civic engagement. While the proposed bylaw amendment would not prohibit peaceful gatherings, protests or demonstrations, including any such activities that occur as part of a labour union strike, information pickets and/or activities related to labour disputes, the City recognizes that the existence of bylaw provisions of this nature may result in community members feeling like they are unable to peacefully demonstrate. Targeted engagement and outreach to these groups will be conducted to ensure comprehensive communication of the bylaw amendment's application and implementation, in consultation with Social Development.

RECOMMENDATIONS

The City Manager recommends that:

1. City Council amend City of Toronto Municipal Code Chapter 743, Streets and Sidewalks, Use of, substantially in accordance with the proposed bylaw amendment attached as "Attachment 5" to this report.
2. City Council direct that the proposed bylaw amendment come into force on July 2, 2025.
3. City Council direct the General Manager, Transportation Services to manage in-year costs for staffing and resourcing for the administration of the proposed bylaw amendment within Transportation Services' 2025 Operating Budget, and include future staffing and resourcing required through future budget processes.
4. City Council forward this item for information to the Toronto Police Service Board.

FINANCIAL IMPACT

Based on preliminary discussions and consideration of available City funds, City staff anticipate up to \$200,000 for public education, communication and outreach activities, which will be managed in the City Manager's Office's 2025 Operating Budget.

Estimated financial implications to Transportation Services of \$1.6 million for 12 staff and a one-time purchase of vehicles and laptops for 2025 associated with administering the bylaw amendment will be managed within Transportation Services' 2025 Operating Budget. Future staffing and resourcing will be identified and reported through future budget processes as required.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the information as presented in the Financial Impact Section.

EQUITY IMPACT STATEMENT

The City recognizes that demonstrations are an important means for groups and individuals who historically have not had access to traditional political processes and power to express their opinions, perspectives and experiences, and to advocate for change. This includes Indigenous, Black and equity-deserving communities. While the proposed bylaw amendment does not prohibit peaceful gatherings, protests or demonstrations, including any such activities that occur as part of a labour union strike, information pickets and/or activities related to labour disputes, the City recognizes that the existence of bylaw provisions of this nature may result in community members feeling unable to peacefully demonstrate in Toronto. This could potentially contribute to further marginalization of groups, as well as potentially impact the City's community relations, and current and future engagement with Indigenous, Black and equity-deserving communities.

The public consultation process for a proposed bylaw included directed engagement with the Indigenous community, Black community, 2SLGBTQ+ community, racialized communities, newcomers, youth, seniors, legal and civil liberties groups, human rights organizations, faith-based groups, labour groups and organizations and community organizations. Most of these groups expressed the critical importance of demonstrations in Toronto and the potential negative impact of any form of a bylaw on freedom of expression and civic engagement. For those groups that were in support of a proposed bylaw, the reasons cited were safety, harassment and nuisance.

Should Council adopt the proposed bylaw amendment, the implementation plan would include targeted engagement and outreach with Indigenous, Black and equity-deserving communities to ensure comprehensive communication of the bylaw amendment's application.

DECISION HISTORY

At its meeting on December 17 and 18, 2024, City Council adopted the Policy Framework - City Response to Demonstrations in Attachment 1 to the report (December 10, 2024) from the City Manager and directed the City Manager to update the Framework as necessary to ensure the Framework remains current and responsive to the City's needs and priorities.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.CC24.2>

At its meeting on December 17 and 18, 2024, City Council directed the City Manager, in consultation with the City Solicitor, applicable City divisions, the Toronto Police Service and other applicable stakeholders, to report to City Council in the first quarter of 2025, informed by public consultations and a constitutional legal expert opinion on the Charter

Rights implications from the City Solicitor, with a proposed bylaw, with an emphasis on protecting vulnerable institutions such as places of worship, faith-based schools and cultural institutions, that supports the City's commitment to keeping Torontonians safe from hate and protects Charter rights that address impacts of demonstrations that target people based on their identity as prohibited under the Ontario Human Rights Code.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.CC24.2>

At its meeting on May 22 and 23, 2024, City Council requested the City Manager, in consultation with the City Solicitor, to develop an action plan to recognize that Torontonians are able to practice their faith and access their place of worship free of intimidation and harassment; and are able to freely exercise their protected Charter rights to freedom of assembly, religion and expression and convey the action plan directly to relevant participating bodies including Municipal Licensing and Standards and the Toronto Police Service Board.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.MM18.16>

At its meeting on February 6 and 7, 2024, City Council directed the City Manager to develop a policy framework for the management and monitoring of rallies and protests, ensuring alignment with the City's Human Rights and Anti-Harassment Policy, and report back to City Council by December 2024.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.IE10.7>

COMMENTS

1. BACKGROUND

Since December 2024, City staff have been advancing work on a proposed bylaw addressing impacts of demonstrations in certain locations, in response to Council direction. As defined in the City's [Policy Framework - City Response to Demonstrations](#), demonstrations are public gatherings where people assemble around a common purpose as a form of largely peaceful assembly and expression, such as rallies and protests.

Demonstrations occurring anywhere in the city are events where the Toronto Police Service serves as the primary responder and enforcement agency to preserve the peace, maintain public safety and uphold people's right to demonstrate peacefully. Based on information provided by the Toronto Police Service as requested by the City, a total of 680 demonstrations have occurred city-wide in 2024, representing the highest total number over the past seven years.

Year	2018	2019	2020	2021	2022	2023	2024
# of Demonstrations	513	492	411	505	463	605	680

Like many major cities, Toronto is often a primary site for demonstrations in response to local, domestic and global issues. The City recognizes that people's right to peacefully

demonstrate is an important part of a free and democratic society, where citizens can voice their opinions, raise attention on issues and advocate for change.

The [Canadian Charter of Rights and Freedoms](#) protects a number of rights and freedoms. Under section 2 of the Charter, everyone has the following fundamental freedoms:

- freedom of conscience and religion;
- freedom of thought, belief, opinion and expression, including freedom of the press and other media of communication;
- freedom of peaceful assembly; and
- freedom of association.

The City has a legal obligation to uphold Charter rights and freedoms. Although Charter rights are not absolute, any limits imposed by a government must be reasonable and justified in a free and democratic society.

In response to Council's direction, the City Manager's Office and Legal Services worked closely together, in consultation with the Toronto Police Service, and informed by feedback from City divisions with applicable subject-matter expertise, such as Corporate Real Estate Management (Corporate Security), Municipal Licensing and Standards, Social Development, Strategic Public and Employee Communications, and Transportation Services. City staff were mindful of the various needs and priorities in undertaking this work, including respecting Charter rights, applying a reconciliation and equity lens, keeping Toronto safe for all, and taking a balanced and measured approach that considers all diverse perspectives and options to respond to Council's direction and support informed decision-making.

City's Authority and Jurisdiction

Under section 8 of the City of Toronto Act, 2006, the City may pass bylaws in respect of the economic, social and environmental well-being of the City, the health, safety and well-being of persons and protection of persons and property, including consumer protection. The City also has authority with respect to properties it owns or occupies, such as its streets, squares and parks and may pass bylaws in respect of those spaces.

The City's Bylaw Enforcement Officers enforce City bylaws; however they do not respond to disorderly behaviour or criminal activities. The City collaborates with other enforcement agencies, such as the Toronto Police Service, who have effective authority, enforcement powers and training to preserve the peace and maintain public safety.

2. LEGISLATIVE ENVIRONMENT

City staff conducted a jurisdictional scan reviewing applicable bylaws and legislation to support the development of a proposed bylaw. A summary of this review is provided below, with further details available in Attachment 1.

Current City Bylaws

The City's current bylaws do not regulate demonstrations as a standalone concept. There are, however, applicable City bylaws that prohibit certain activities and conduct that could occur during a demonstration. Examples include the following:

- [Noise Bylaw](#) - regulations on amplified sound, sound disturbing religious ceremony, and unreasonable and persistent noise
- [Parks Bylaw](#) - prohibitions on riotous, boisterous, violent, threatening, or illegal conduct; creating a nuisance by loitering, spying, accosting, frightening, annoying or otherwise disturbing other persons
- [Public Squares Bylaw](#) - requirement for organizers of permitted events in certain squares to sign Human Rights Code declarations
- [Election and Temporary Signs Bylaw](#) - requirements for temporary/election/third-party signs
- [Street Vending Bylaw](#) - permit requirement for street vending
- [Streets and Sidewalks Bylaw](#) - prohibition on obstructing or damaging streets

Municipal Bylaws

Calgary, Vaughan and Brampton have adopted bylaws that prohibit certain activities within specific distances of prescribed locations. Calgary's [Safe and Inclusive Access Bylaw](#) prohibits "specified protests" within 100 metres of an entrance to a recreation facility or library. Vaughan's [Protecting Vulnerable Social Infrastructure Bylaw](#) prohibits "nuisance demonstrations" within 100 metres of the property line of any vulnerable social infrastructure (such as a place of worship, school, childcare centre, hospital or congregate care facility). Brampton's [Protecting Places of Worship from Nuisance Demonstrations By-law](#) prohibits "nuisance demonstrations" within 100 metres of the property line of any place of worship.

While all three bylaws apply to different locations, they share a common feature of a 100-metre distance applied either to the entrance or property line of designated sites. The Brampton and Vaughan bylaws both prohibit "nuisance demonstrations", which refer to protesting or expressing views (whether intended or not) that by an objective standard causes a reasonable person to be intimidated, meaning they are either concerned for their safety or security, or unable to access the prescribed location. In comparison, Calgary's bylaw prohibits "specified protests", which refer to an expression of objection or disapproval towards an idea or action related to race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation.

Other jurisdictions are also in the process of considering similar bylaws or reviewing its feasibility. In April 2025, City of Ottawa staff issued a [memorandum](#) in response to Council's direction to staff to consider the feasibility of implementing a Vulnerable Social Infrastructure Bylaw similar to Vaughan's bylaw. Oakville will be considering a [Potential Protest By-law near Vulnerable Social Infrastructure](#) aimed at regulating certain activities defined as a specified protest near vulnerable social infrastructure, such as places of worship, hospitals, schools, daycares and libraries. City of Mississauga staff are developing formal recommendations to present to City Council in [June 2025](#), in

response to Council direction for staff to report back with a report and, if necessary, a draft bylaw recommending the preferred course of action to address protests occurring near places of worship. As well, at its meeting on [March 26, 2025](#), Hamilton City Council received a report on the feasibility of the adoption and enforcement of a bylaw to prohibit protests at places of worship and their facilities, and directed staff to report back with a draft bylaw.

Federal and Provincial Legislation

There are examples of legislation establishing "access zones" that have been passed by other orders of government. Ontario's [Safe Access to Abortion Services Act](#) prohibits prescribed activities in access zones for abortion clinics and facilities and residences of abortion service providers. Abortion clinics and facilities [submit a request](#) to the Province to establish an access zone. Information provided in the request includes reasons for requesting the access zone, such as past, current or anticipated activities that could prevent access to abortion services, and the impact of granting or not granting the request on patients, providers or others. Requests are considered by the Ministry of the Attorney General and the Ministry of Health on a case-by-case basis. For a clinic, the access zone consists of the property on which the clinic is located and the area within 50 metres to 150 metres from the boundaries of the property. For a facility, the access zone consists of the property on which the facility is located and the area within the prescribed distance, not exceeding 150 metres from the boundaries of the property. Abortion service providers receive automatic access zones of 150 metres around their homes. Once an access zone has been established, it is illegal to conduct prescribed activities within the zone that may intimidate or interfere with patients and abortion service providers.

British Columbia also passed the [Safe Access to Schools Act](#) to prohibit people from interfering with safe access to school grounds. Under the legislation, an access zone is an area where specified forms of harmful behaviour are not allowed. Within the access zone, it is an offence to engage in behaviours that can harm students and staff or disrupt school programs. The access zone for a school includes the parcel on which the school is located and the area that extends 20 metres from the boundaries of the parcel. The legislation will be repealed on July 1, 2026 or an earlier date prescribed by the Lieutenant Governor in Council.

On May 8, 2025, the Ontario provincial legislature ordered that [Bill 16, Sacred Spaces, Safe Places Act, 2025](#) be sent for second reading. The bill proposes a statute that would create access zones of 150 metres around religious institutions. City staff will monitor the bill as it proceeds through the provincial legislature.

The [Trespass to Property Act](#) also provides owners or occupiers of lands, including the City, an enforcement mechanism to prevent unauthorized entry on their premises, prohibit certain activities while on their property, or remove unauthorized individuals from the premises. The Trespass to Property Act may be used by private property owners and by various levels of governments for lands under their respective control. As owners and occupiers of municipal properties, the City can elect to use the trespass to property powers to prohibit a person from engaging in prohibited activities on its properties, or to prohibit entry on the premises.

With respect to federal legislation, the [Criminal Code](#) outlines the conduct that constitutes criminal offences, including behaviours that cross the line from peaceful demonstration to criminality. Examples of criminal offences include: unlawful assembly ([s. 63](#)); riots ([s. 64](#)); nuisance ([s. 180](#)); harassment ([s. 264](#)); public incitement of hatred ([s. 319](#)); intimidation ([s. 423](#)); intimidation, obstruction and interference preventing access to health services ([s. 432.2](#)); and mischief ([s. 430](#)). Recently during the federal election campaign, the Liberal Party of Canada made a [commitment](#) to introduce legislation to make it a criminal offence to intentionally and willfully obstruct access to any place of worship, schools, and community centres, and to willfully intimidate or threaten those attending services at these locations. Upon the swearing in of new Ministers, City staff will monitor for updates from the federal government regarding this election commitment.

3. PUBLIC CONSULTATION

On March 17, 2025, the City launched public consultations on a proposed bylaw. The City undertook a multi-pronged approach for public consultation to maximize opportunities for public input and enable broad participation and inclusive representation.

The nature of the subject matter of the public consultation required careful consideration of the most appropriate spaces and methods to facilitate safe and constructive discussions. The consultation approach prioritized inclusivity, safety, access and privacy. Third-party consultant services were procured to support the consultation and facilitate the comfort and safety of all participants in providing input to the City.

Consultation Methods

The consultation gathered input and feedback through the following methods:

- Survey: an anonymous online survey was available between March 17, 2025 and May 1, 2025
- Written Submissions: comments via email were accepted between March 17, 2025 and May 1, 2025
- Public Sessions: two virtual public sessions took place on April 22, 2025 and April 30, 2025
- Community-Focused Discussion Sessions: small group discussions took place with individuals from and organizations representing Indigenous, Black, equity-deserving groups, 2SLGBTQ+, racialized communities, newcomers, youth, seniors, as well as legal and civil liberties groups, human rights organizations, faith-based groups, environmental sector, unions and labour organizations, public transit and climate justice advocates

Further detail on the consultation methods is available in Attachment 2 and the groups/organizations engaged as part of the community-focused sessions are listed in the third-party consultant report in Attachment 4.

Consultation Method Limitations

The online survey did not collect location-specific data to ensure anonymity and privacy, and thus it cannot be determined with confidence all respondents to the survey reside in Toronto and that each response is unique to one individual. The collection of demographic data in this survey is aligned with City Clerk's Information Management recommendations and the City's Data for Equity Strategy, which state that the minimum amount of data should be collected in demographic questions and that demographic questions be optional for respondents. Further, while online surveys are accessible on most digital devices, the City recognizes that surveys can privilege those with trust, access and time.

In the public sessions, participants were unable to view the names of other participants and the chat responses from other participants for safety and privacy reasons. This limited dialogue between participants and the ability to hear perspectives from others.

For the community-focused discussion sessions, the timeline of the consultation did not allow for engagement of some groups due to scheduling availability, as well as an inability to host follow-up conversations. Many groups expressed that the timeline of the consultation was too short for adequate consultation on a topic of this nature.

Mitigation

The results of the consultation are not solely based on one method of data collection, and the overall findings balance input from all the various methods. To ensure Toronto voices were included in the consultation, the public sessions required registrants to enter a Toronto postal code, and the community-focused sessions were with Toronto-based groups and organizations. Directed outreach to Indigenous, Black and equity-deserving groups was undertaken to ensure communities could access the various consultation methods. Reflection on the survey data received to date, to ensure representativeness, was done in the public sessions and the community-focused sessions. The survey was available in 18 languages to improve accessibility. Alternative formats to online were offered upon request, however no requests were made to the City.

Summary of Consultation Feedback

Key Themes Across All Methods:

- Polarization of opinion in terms of strong support for or strong opposition to a potential proposed bylaw
- Concern about potential infringement of rights protected under the Canadian Charter of Rights and Freedoms
- Support for demonstrations in Toronto
- Ability for the City to explore and/or utilize other existing enforcement tools to address concerns about demonstrations
- Lack of clarity around the definition of "vulnerable institutions"

3.1. Survey

Overview:

- Total respondents: 42,747
- More than 130,000 responses received for open-text questions
- 81 per cent of survey respondents reached the end of the survey
- 536 non-English surveys were completed
- Unable to express high confidence that the survey respondents were from Toronto as IP address and location metadata were not available (for privacy/anonymity)

Demographics:

- The responses reflected a variety of age groups, gender identities and racial backgrounds, indicating broad demographic engagement
- Some demographic groups were overrepresented in the responses, as compared to the 2021 Census

Further demographic data from the survey is available in Attachment 2. The survey questions are available in Attachment 3.

Summary of Findings

Frequency of Encountering Demonstrations:

- 60 per cent of respondents indicated that they encounter demonstrations "Occasionally" or "Often" in Toronto
- 36 per cent of respondents indicated that they "Never" or "Rarely" encounter demonstrations in Toronto

Feelings When Encountering Demonstrations:

- A majority of respondents had "Often" or "Always" felt appreciative and supportive when encountering a demonstration in Toronto
- A majority of respondents "Never" or "Rarely" felt inconvenienced, uncomfortable, scared or have a concern for their safety
- 71 per cent had "Never" or "Rarely" not been able to access the building/program/service that they want as a result of a demonstration. 13 per cent of respondents had "Always" or "Often" been unable to access the building/program/service, while 14 per cent of respondents reported that they "Sometimes" had not been able to access the building/program/service that they want as a result of a demonstration

Vulnerable Institutions:

- The top three responses were child care centres, places of worship and faith-based schools, chosen by over 40 per cent of respondents
- "None of the above" (meaning none of the identified options provided) ranked as the 4th highest choice, chosen by 33 per cent of respondents

Support for Toronto Adopting a Bylaw Similar to Other Municipalities:

- 63 per cent of respondents were either "Strongly unsupportive" or "Somewhat unsupportive"
- 32 per cent of respondents were either "Strongly supportive" or "Somewhat supportive"
- Respondents were deeply polarized as the top two responses were either "Strongly unsupportive" or "Strongly supportive"

Appropriate Distance for a Bylaw, if Adopted:

- There was no strong choice of distance
- A third of respondents chose "Other" distance, mostly writing in distances from "more than 100 metres", to "kilometres away", or "0 metres".
- Less than 10 metres was the 2nd highest choice
- 10 metres to 50 metres was the least desired choice

Qualitative Analysis (Text-Based Responses)

More than 130,000 written comments were provided by respondents in 8 open-text question opportunities. Analysis of these text-based responses was through thematic content analysis where keyword and key phrase coding was digitally applied to all responses.

Five high-level themes were formed through this analysis, including:

- Freedom of Expression, Charter of Rights and Freedoms, Democracy
- Support for Demonstrations
- Concern for Individual and Public Safety, Fear, Discomfort
- Targeted and Vulnerable Groups, Institutions
- Enforcement of Bylaw and Existing Regulations

More details, data tables, visual representations and sample comments from the survey are available in Attachment 2.

3.2. Written Submissions

A total number of 108 written submissions were received, of which 25 were from various organizations. The list of organizations and more details on the findings are available in Attachment 2.

Summary of Findings

- 63 per cent of written submissions expressed concerns about proposing a demonstrations bylaw to protect vulnerable institutions, 22 per cent expressed support, and 15 per cent provided general feedback or questions.
- 19 submissions from organizations expressed concerns about proposing a demonstrations bylaw to protect vulnerable institutions, and 6 submissions expressed support.

Themes:

- Right to demonstrate: the risk and danger of infringing Charter rights, freedom of expression and democracy.
- Lack of clarity: the lack of clear definitions in reference to a proposed bylaw, resulting in an overarching proposal which could prevent demonstrations from happening in many public spaces across the city and negatively impact equity-deserving groups and labour unions.
- Existing regulation and enforcement: The overlap with existing laws, which can be better enforced to achieve the goals of protecting vulnerable institutions and allowing

peaceful demonstrations. The risk of over-policing and diverting City resources from other priorities such as housing and transportation.

- Implementation challenges: the challenge of implementing a bylaw, given the difficulty of informing the public where this bylaw applies.
- Protection of vulnerable communities: the need to protect vulnerable communities from hateful and intimidating demonstrations.
- Protection from hate crimes: the need to take action against hate crimes, expressions of hatred and harassment targeting groups based on their racial or religious identity, such as implementing new regulations and ensuring better enforcement.
- Nuisances and traffic: the need to protect public spaces from excessive noise, nuisance and disrupted traffic.

3.3. Public Sessions

Two public sessions took place on April 22, 2025 and April 30, 2025 and were hosted and facilitated by the third-party consultant.

Summary of Findings

- Strong majority oppose a potential proposed bylaw.
- Opposition rooted in concerns about rights and enforcement of existing regulations, rendering a new bylaw unnecessary.
- Support primarily focused on religious community safety.
- Common topics of responses included:
 - faith-based communities and religious institutions
 - racialized communities
 - police powers; and
 - vulnerability of people, rather than institutions.

Further detail on the public sessions is available in the third-party consultant report in Attachment 4.

3.4. Community-Focused Discussion Sessions

There were 16 community-focused discussion sessions representing 70 community groups and organizations. These included Indigenous, Black, equity-deserving groups, 2SLGBTQ+, racialized communities, newcomers, youth, seniors, legal and civil liberties groups, human rights organizations, faith-based groups, environmental sector, unions and labour organizations, public transit and climate justice advocates.

Summary of Findings

Support and Opposition for a Proposed Bylaw:

- 14 per cent of the community groups represented stated support of a potential proposed bylaw, while 86 per cent of the groups were opposed.
- Those in support of a proposed bylaw described experiencing frequent demonstrations in close proximity to social infrastructure they use or operate such as places of worship and faith-based schools.

- Operators of sites with frequent demonstrations expressed that they were feeling targeted, threatened and unsafe, and that community members are unable to freely access their sites. This has resulted in significant increased costs of security, and a decline in program participation and lost revenue.

Themes:

- Support for demonstrations: Participants across nearly every session commented that demonstrations are a vital form of civic expression
- Vulnerable institutions: Many participants expressed that the term needs clearer definitions or criteria. While participants agreed that spaces like hospitals, schools and places of worship require protection, several warned that overbroad definitions could open the door to restricting protest near any institution that claims harm. The broad and vague nature of the term “cultural institution” was stated as problematically subjective.
- Safety: Safety emerged as a central concern in the discussions; participants seek protection from hate-motivated demonstrations, but also protection of the right to safely protest
- Canadian Charter of Rights and Freedoms: Many participants expressed that a municipal bylaw must not override protected rights of freedom of expression and peaceful assembly
- Existing or Alternative Approaches: Many participants expressed that current laws addressing unlawful, illegal, hate-based activities are sufficient, and asked that the City explore alternatives to a bylaw such as education and awareness

Further detail on the public sessions is available in the third-party consultant report in Attachment 4.

3.5. Councillor-Led Sessions

Staff from the City Manager’s Office were invited and attended to observe sessions organized by some City Councillors with residents, community groups and organizations convened to provide feedback on a proposed bylaw. The list of organizations represented at these meetings is available in Attachment 2.

Roundtable – Proposed Demonstrations Bylaw, April 8, 2025

- Hosted by Councillor Bradford and Councillor Pasternak
- Participants expressed support for a proposed bylaw and expressed its necessity to protect targeted communities. Several participants commented on the negative impacts on community safety from demonstrations and expressed the measures that have recently been taken to protect community members have been at a high cost to the community. Examples of negative impacts on individuals and organizations included fear and safety, significant increase in security costs, access issues and decrease in attendance at community programming located at specific locations, and lost revenue from declining program registration. Several roundtable participants provided written submissions and participated in other community-focused sessions, and their feedback is included in those summaries.

Protecting Our Charter Rights: A Conversation on Toronto’s Proposal for a Demonstrations Bylaw, May 8, 2025

- Hosted by Councillor Bravo
- This session included a panel of speakers that presented their perspectives on the subject. The panel and participant discussion focused on the legal aspects of a proposed bylaw. Several participants commented on the existing regulations that would address concerns of demonstrations. Participants discussed other jurisdictions that have adopted similar bylaws and the critical nature of demonstrations in Toronto which would be negatively impacted with the adoption of a bylaw. Several participants of this meeting provided written submissions and participated in other community-focused sessions, and their feedback is included in those summaries.

3.6. Community-Requested Meetings with City Staff

Several community members requested meetings with staff from the City Manager's Office to discuss a proposed bylaw and the consultation process. Staff from the City Manager's Office met with representatives from Independent Jewish Voices, Jews Say No to Genocide, the National Council of Canadian Muslims, Toronto and Region Labour Council, Toronto Centre for Palestine, Toronto Environmental Alliance, TTC Riders and World Beyond War Toronto. At these meetings, community members expressed concern about the consultation process and provided feedback about a proposed bylaw. Most of these groups provided written submissions and/or participated in other community-focused sessions, and their feedback is included in those summaries.

3.7. Public Consultation Communications

Advertising and Promotion:

The public consultation was supported by a phased multilingual communications and advertising strategy that promoted the multiple opportunities for the public to participate. Communications tactics included organic and paid social media, community outreach through Councillor communications (toolkit), integration in City e-newsletter, and postings at Toronto Library Branches and City Community Centres. Paid multilingual print and online advertising was also used in addition to toronto.ca front page presence.

4. ADDITIONAL RESEARCH AND CONSIDERATIONS

A literature search was conducted to identify relevant and available research to support City staff's work. A key area of research identified was on the topic of social infrastructure and its benefits. Council's direction to staff on a proposed bylaw identified examples of social infrastructure. As noted by the City of Vancouver, social infrastructure is made up of the facilities and services that help individuals meet their social needs, maximize their potential for development and enhance community wellbeing, in addition to being a key component in building strong and resilient communities.¹ Researchers have highlighted that policymakers should treat social infrastructure as "those physical spaces in which regular interactions are facilitated between and within the diverse sections of a community, and where meaningful relationships, new forms of trust and feelings of reciprocity are inculcated among local

¹ City of Vancouver, Social Infrastructure Strategy Policy Framework, <https://vancouver.ca/files/cov/social-infrastructure-strategy-policy-framework.pdf> (accessed May 13, 2025).

people."² An international comparative review on social infrastructure noted definitions commonly revolve around three key approaches of social infrastructure as: the physical places that encourage social interaction; created through public services, laws and institutions; and voluntary and community sector infrastructure.³

An environmental scan from the City of Calgary identified various social benefits of social infrastructure⁴, including supporting wellbeing⁵ and a sense of community⁶. While various definitions of social infrastructure and its social benefits were found, City staff identified the common and distinguishing feature of social infrastructure was that it serves as a community gathering space, supporting people's relationships and wellbeing within their communities.

In response to Council's direction, City staff also conducted research to identify established definitions of "vulnerable social infrastructure", which were found through the jurisdictional scan of other municipal bylaws. As outlined in Section 2 of this report, Vaughan's [Protecting Vulnerable Social Infrastructure Bylaw](#) and Oakville's [Potential Protest By-law near Vulnerable Social Infrastructure](#) names specific locations considered as vulnerable social infrastructure. Under Vaughan's bylaw, vulnerable social infrastructure means a childcare centre, a congregate care facility, a hospital, a school or a place of worship. Under Oakville's potential bylaw that will be brought forward for Council consideration, vulnerable social infrastructure means places of worship, hospitals, schools, daycares, and libraries.

Another area of research focused on people's perception of safety. UN-Habitat identifies two dimensions of safety: actual and perceived. The actual dimension refers to the risk of becoming a victim, and the perceived dimension refers to people's perception of insecurity through the lens of fear and anxiety.⁷ Researchers have noted that a perception of safety plays a significant role in making places appear safe or unsafe.⁸ City staff were informed by the concept of "perceived safety" as certain behaviours and

2 Tom Kelsey & Michael Kenny, "Townscapes: 7. The Value of Social Infrastructure," Bennett Institute for Public Policy Cambridge, May 2021, https://www.bennettinstitute.cam.ac.uk/wp-content/uploads/2020/12/Townscapes_The_value_of_infrastructure.pdf (accessed May 13, 2025).

3 Helena Hollis et al., "Social infrastructure: international comparative review," Bennett Institute for Public Policy Cambridge, January 2023, https://www.bennettinstitute.cam.ac.uk/wp-content/uploads/2023/01/Social_infrastructure_international_comparative_review.pdf (accessed May 13, 2025).

4 Christine Vandenberghe, "Social Infrastructure Impact Measurement Environmental Scan," City of Calgary, October 2020, https://www.calgary.ca/content/dam/www/engage/documents/pools/Social_Impact_Measurement_E_Scan_Revised.pdf (accessed May 13, 2025)

5 Melanie Davern et al., "Using Spatial Measures to Test a Conceptual Model of Social Infrastructure That Supports Health and Wellbeing," *Cities & Health* 1,2. (2017): 194-209. doi:10.1080/23748834.2018.1443620.

6 Michael Rac, "Is Everyone in the Pool? Lessons on Access and Equity from Toronto's Regent Park Aquatic Centre," Queen's University, 2014, https://www.queensu.ca/geographyandplanning/sites/dgpwww/files/uploaded_files/SURP/Theses%20and%20Reports/Michael_Rac_Exec_Summary.pdf (accessed May 13, 2025)

7 UN-Habitat. "Resolution adopted by the United Nations Habitat Assembly on 31 May 2019," United Nations, June 13, 2019, https://unhabitat.org/sites/default/files/documents/2019-07/hsp_ha.1_res.2_e.pdf (accessed May 13, 2025)

8 Federico Costamagna, Rebecka Lind & Olof Stjernström, "Livability of Urban Public Spaces in Northern Swedish Cities: The Case of Umeå," *Planning Practice & Research*, 34,2 (2019): 131-148, doi: 10.1080/02697459.2018.1548215.

actions observed in public settings may impact a person's perception of safety and present barriers to accessing social infrastructure. Nonetheless, the City recognizes peaceful demonstrations that are non-violent or criminal in nature can be disruptive, and in fact, intended to disrupt as a means of drawing attention to and advancing a cause.

Additional factors unique to Toronto that were considered include the City's sprawl and density, public right-of-way widths, the City's role in bylaw administration and enforcement, and Toronto's diversity.

5. OVERVIEW OF PROPOSED BYLAW AMENDMENT

Based on learnings from the jurisdictional scan, research and diverse feedback received through the public consultation process, City staff recommend amending the Streets and Sidewalks Bylaw to include new provisions as outlined in Attachment 5. The proposed bylaw amendment affirms that the City's streets and sidewalks are for all, and that residents should not be impeded from access to social infrastructure and its programs and services. The proposed bylaw amendment leverages and builds upon an existing City bylaw to ensure access to social infrastructure by prohibiting certain activities and conduct on City property.

The proposed bylaw amendment would direct staff to establish an Access Area prohibiting specific behaviours which prevent access to prescribed Social Infrastructure for a 180-day period upon a request from the Owner (property owner or operator) that meets listed criteria. By scoping the application of the proposed bylaw amendment to specified locations where prohibited actions have occurred and times in relation to the locations' operations, the bylaw amendment aims to protect access to the Social Infrastructure while limiting the potential impairment on Charter rights.

A request-based approach would enable Owners of specified locations to request an Access Area, in which prohibitions under the proposed bylaw amendment would apply to respond to access barriers and mitigate impacts on the community, based on the circumstances at a point in time. The proposed bylaw amendment would apply to prescribed Social Infrastructure, defined as a Childcare Centre, a Place of Worship or a School, to mitigate barriers to access where identifiable communities and children (i.e. minors) gather.

An established Access Area would cover any City property that is within 20 metres from the boundaries of the property on which the prescribed Social Infrastructure is located. The 20-metre distance reflects consideration of a reasonable perimeter that achieves the intended objective of protecting access to the prescribed Social Infrastructure, while being minimally impairing on Charter rights and operationally practicable in relation to Toronto's built environment.

5.1. Purpose

The proposed bylaw amendment recognizes that the City's streets and sidewalks are for all, and that residents should not be impeded from access to social infrastructure and its programs and services. As described above, the City recognizes that access to social infrastructure has important impacts on the economic, social and environmental

well-being of the City and its residents. Where physical, psychological or emotional barriers exist which prevent residents from safely accessing social infrastructure, the health, safety and well-being of persons can be impacted not only at the time access is attempted, but also in general and over a longer term.

The proposed bylaw amendment aims to ensure safe access to all persons, regardless of personal characteristics, wishing to access programs and services at prescribed Social Infrastructure by reducing, preventing and eliminating physical, psychological and emotional barriers that may prevent persons from accessing such facilities. The proposed bylaw amendment is intended to regulate conduct and behaviours in certain locations and at certain times that pose unreasonable barriers to access. While the proposed bylaw amendment would prohibit certain behaviours which impact access to prescribed Social Infrastructure within certain locations at certain times, it does not prohibit peaceful gatherings, protests or demonstrations, including any such activities that occur as part of a labour union strike, information pickets and/or activities related to labour disputes. Furthermore, the proposed bylaw amendment does not prohibit the regulated behaviours outside of the established Access Areas and at times outside of the proposed bylaw amendment's listed times. The proposed bylaw amendment's objective is thus to ensure safe access to prescribed Social Infrastructure while respecting applicable Charter rights of all involved.

5.2. Prescribed Social Infrastructure

The proposed bylaw amendment would enable Access Areas to be established at designated locations, identified under the proposed bylaw amendment as prescribed Social Infrastructure. Prescribed Social Infrastructure includes Childcare Centres, Places of Worship and Schools to mitigate barriers to access where identifiable communities and children (i.e. minors) gather. These locations were selected in response to Council's direction and informed by feedback received in the public consultation, where these locations were most frequently identified by survey respondents, as well as in some of the public and community-focused sessions.

5.3. Access Area

The proposed bylaw amendment would prohibit the behaviours described below in an Access Area established by the General Manager of Transportation Services at a particular prescribed Social Infrastructure property for a 180-day period. The General Manager would only establish the Access Area upon a request from the Owner if certain criteria are met. The Access Area covers any City property that is within 20.0 metres from the boundaries of the property on which the prescribed Social Infrastructure is located.

An Access Area is established if the City receives a request from the Owner of the prescribed Social Infrastructure that meets all of the following criteria:

- The Owner attests that a prohibited activity listed has occurred within the previous 90 days on City Property located within 20.0 metres from the boundaries of the property on which their Social Infrastructure is located;
- The Owner attests that access to the Social Infrastructure has been impeded as a result of a prohibited activity that has occurred within the previous 90 days;

- The Owner attests that they have reason to believe a prohibited activity will occur again or continue to occur on any City Property located within 20.0 metres from the boundaries of the property on which their Social Infrastructure is located.

The City will provide notice to the public of established Access Areas by posting a notice on the City's website, and posting or requiring the Owner to post signage in a form satisfactory to the General Manager in locations determined by the General Manager with such locations potentially including on the property on which the Social Infrastructure is located or on or around the Access Area. An Access Area may be renewed for additional 180-day periods if the City receives a request for renewal that meets all the criteria noted above.

The size of the Access Area was selected in an effort to ensure access to prescribed Social Infrastructure is possible from the side of the street on which the Social Infrastructure is located. City staff reviewed public right-of-way widths in Toronto, including the City's design standards for streets and sidewalks and the widths of major streets to determine a reasonable distance. A 20-metre Access Area aims to ensure that while persons attempting to access prescribed Social Infrastructure can do so safely, others can also use the adjacent City property outside of the Access Area. Individuals will be able to be in the vicinity of the prescribed Social Infrastructure and convey the messages they wish without placing barriers on access to the Social Infrastructure and its programs and services.

The criteria established for the General Manager to establish an Access Area also reflects a balancing of interests, recognizing that an Access Area will only be established where there is a history of access-impeding activity that the Owner attests have occurred and they believe will recur. This aims to ensure Access Areas are only established where barriers to safe access are established based on information attested to in a request.

The time limitation also reflects a balancing of interests, ensuring safe access can occur during times where this may be difficult, but not prohibiting the listed behaviours outside of those times.

5.4. Prohibitions

If an Access Area is established, the specific behaviours and conduct described below are prohibited inside the Access Area at the times when the Social Infrastructure adjacent to the Access Area is being used by the Owner for the primary purposes of its operation as a Childcare Centre, Place of Worship or School, as well as one hour before and one after Operating Hours. This considers a balance of interests, ensuring access to the primary purposes of the Social Infrastructure and its programs and services, while limiting the potential impairment on Charter rights.

While in an established Access Area, no person shall:

- perform or attempt to perform an act of disapproval concerning a person's attendance at, use of, or attempts to attend or use Social Infrastructure;
- persistently request that a person refrain from accessing Social Infrastructure;

- obstruct, hinder or interfere or attempt to obstruct, hinder or interfere with another person's access of or attempt to access Social Infrastructure; or
- express an objection or disapproval towards any person based on race, ancestry, place of origin, colour, ethnic origin, citizenship, religion/creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status, disability or the receipt of public assistance by any means, including graphic, verbal, or written means.

These behaviours were identified as actions that pose unreasonable physical, psychological and emotional barriers to accessing prescribed Social Infrastructure, informed by precedents in other comparable bylaws and legislation aimed at protecting access as outlined in Section 2 of this report.

In an effort to balance the interests of all residents, these behaviours are not prohibited outside of an Access Area, meaning they could potentially occur in the vicinity of the prescribed Social Infrastructure while not denying access to the property.

Prohibitions in Access Areas for Social Infrastructure do not apply to actions or messaging by or with the consent of the Owner at the Social Infrastructure, or a Square. The bylaw amendment does not prohibit peaceful gatherings, protests or demonstrations, including any such activities that occur as part of a labour union strike, information pickets and/or activities related to labour disputes.

5.5. Fines and Offences

While the intended outcome is to achieve proactive and voluntary compliance through an education-first approach, enforcement action may be taken where necessary and appropriate. As in other City bylaws, the bylaw itself may also provide the ability to also use the Trespass to Property Act provisions as an alternative enforcement mechanism as it establishes a provincial offence for persons who engage in activities or who enter premises where they are prohibited.

Should Council adopt the proposed bylaw amendment, engaging in the prohibited behaviours in an access area during the prescribed times would be an offence. The fine levied in any given case would be determined by the courts. The staff proposed maximum range for a penalty in the bylaw is the default penalty amount provided under the Provincial Offences Act. For clarity, this amount is currently \$5,000.00 per conviction.

6. ENFORCEMENT

Should Council adopt the proposed bylaw amendment, it could provide Bylaw Enforcement Officers supported by police with an additional mechanism to assist them in enabling safe access to social infrastructure. As part of an education-first approach, the proposed bylaw amendment could also be used as an educational tool to promote proactive and voluntary compliance.

The proposed bylaw amendment also contains a provision requiring that enforcement staff would provide notice of bylaw contravening activity prior to laying any charges.

This would allow persons to voluntarily comply with the bylaw prior to being subject to any further enforcement action.

The bylaw would permit Bylaw Enforcement Officers to escalate from education to enforcement when education has not been effective. Further, with a clear statutory prohibition in place, police would be able to utilise the Trespass to Property Act more easily.

7. IMPLEMENTATION PLAN

Administration

If adopted by Council, the City Manager's Office will support Transportation Services to administer the proposed bylaw amendment as part of the transition to prepare for the new bylaw provisions coming into effect. Transportation Services will be responsible for the administration of the proposed bylaw amendment, including the intake, processing and review of requests, liaison with stakeholders, complaints/appeals process and public notice requirements. Estimated financial implications to Transportation Services of \$1.6 million for 12 staff and a one-time purchase of vehicles and laptops for 2025 associated with administering the bylaw amendment will be managed within Transportation Services' 2025 Operating Budget. Future staffing and resourcing will be identified and reported through future budget processes as required.

Although not exact comparators, City staff can draw from the administration of existing City programs as a model to leverage best practices and help determine appropriate staffing and resourcing required to administer the proposed bylaw amendment. For comparison purposes as the proposed bylaw amendment would be administered as a request-based program, sample metrics from other City programs include the following:

- [CaféTO Curb Lane Program](#) - Permits processed for approximately 300 locations per year. Approximately \$1.7 million and 15 dedicated staff required for permitting and enforcement.
- [Street Event Permit](#) - Permits processed for approximately 400 events per year. Approximately \$1.3 million and 12 staff required for permitting and enforcement.

Access Area Requests

This report recommends the proposed bylaw amendment come into effect on July 2, 2025. If adopted by Council, as of July 2, 2025, the City will begin accepting requests for Access Areas. Information on the request process will be communicated as part of the public education, communication and outreach campaign as recommended below.

Public Education, Communication and Outreach

To ensure the public is aware, understands the new regulations that would be coming into effect and how the bylaw would be enforced, a comprehensive multi-lingual public education and communications campaign, in collaboration with the Toronto Police Service, is recommended. The Customer Experience Division would also be engaged to

ensure residents are provided with the required information and assistance through 311 Toronto.

Targeted engagement and outreach to Owners of the prescribed Social Infrastructure will be conducted to ensure they understand the bylaw's application and request process for an Access Area.

Through the public consultation process and directed engagement with Indigenous, Black and equity-deserving communities, the City received feedback expressing the critical importance of demonstrations and the potential negative impact on freedom of expression and civic engagement. While the proposed bylaw amendment would not prohibit peaceful gatherings, protests or demonstrations, including any such activities that occur as part of a labour union strike, information pickets and/or activities related to labour disputes, the City recognizes that the existence of bylaw provisions of this nature may result in community members feeling like they are unable to peacefully demonstrate. Targeted engagement and outreach to these groups will be conducted to ensure comprehensive communication of the bylaw amendment's application and implementation, in consultation with Social Development.

Based on preliminary discussions and consideration of available City funds, City staff anticipate up to \$200,000 for public education, communication and outreach activities, which will be managed in the City Manager's Office's 2025 Operating Budget. A communications plan will be developed by Strategic Public and Employee Communications that achieves the goals of the public education, communication and outreach campaign within the identified budget.

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SIGNATURE

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ATTACHMENTS

Attachment 1 - Jurisdictional Scan

Attachment 2 - Public Consultation Overview and Data

Attachment 3 - Survey Questions

Attachment 4 - Consultant Report on Public Consultation Sessions and Community-Focused Discussion Sessions

Attachment 5 - Proposed Bylaw Amendment