



October 29, 2025

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2PHC
Attention: Nancy Martins

RE: PH25.3 - Community Within Reach: Expanding Housing Options in Neighbourhoods (EHON) Neighbourhood Retail and Services Study - Phase Three Final Report (Ward All)

Dear Chair Gord Perks and members of Planning and Housing Committee,

The Federation of North Toronto Residents Associations represents over 35 resident associations in North Toronto and North York, and works to bring forward a coordinated and informed perspective on the City's land use and transportation issues affecting the neighbourhoods and the City. The residents' associations that make up FoNTRA believe that Toronto can and should achieve better development.

The report makes three recommendations for City Council to amend Zoning By-law 569-2013, substantially in accordance with the draft Zoning By-law Amendments appended as Attachments 1,2,3:

1) Neighbourhood retail and services on major streets

Wide range including small stores, cafes, medical offices, after-school programs, cleaners, barbers and professional offices on all properties along major/minor arterial roads ([see the map](#)).

2) Neighbourhood retail and services in neighbourhood interiors

In the interior of neighbourhoods, off the major streets, permissions would be limited to a small retail store with the option for a cafe within the store. These would be permitted on corner lots on certain streets or next to schools, parks or commercial sites.

3) Home Occupations

Updated permissions would allow home-based businesses to hire up to two employees, operate from detached garages or laneway buildings and, depending on the business, to see clients on-site.

Our comments focus on the first two categories (Retail and Services), and then deal with Home Occupations separately.

Neighbourhood Retail and Services (1,2)

1. Need for a comprehensive retail services strategy

We support the City's goal for a policy and regulatory environment that is supportive of local retail businesses and services within communities. The Neighbourhoods Retail and Services policy proposals (Main Streets and Interiors) are included within the Expanded Housing Options in Neighbourhoods (EHON) umbrella, yet they involve retail services not housing, and in our opinion would be more suitably addressed under a comprehensive Retail Services Strategy. (The third proposal (Home Occupations) does involve housing uses, and is appropriately considered under EHON).

The City is currently working to create a strategy to address the ongoing loss of Strip Malls, especially prevalent in Scarborough, commonly located on main streets, and which frequently functioned as the suburban equivalent of neighbourhood retail. However the proposed Neighbourhood Retail rezoning is unlikely to represent the solution to the loss of strip malls.

We also know that retail, especially small retail on some main streets, is in trouble due to high rents and uneven ability to be accommodated (“fit”) in new mixed-use development. We need to support the viability and vibrancy of our main streets. As such, there is more of an argument for main street retail re-zoning, less for neighbourhood interiors.

Even in the “old city”, neighbourhood retail stores are much less common than they used to be; some have reverted to residential use, related to changes in the industry and consumer behaviour, not to planning permissions. Today, we have big box stores, online shopping, and delivery. In our opinion, the situation cries out for a comprehensive Retail Services Strategy – a planning approach to the range of retail services that recognizes the changes underway, and the diverse needs across the City.

2. Lack of justification for the proposals

The proposals fail to provide any research/analysis to justify the need for neighbourhood retail in neighbourhoods, other than a reference to the City's increasing population. The report does not present a gap analysis showing where growth is occurring and neighbourhood retail is lacking, and where new permissions are needed. The demise of many strip malls may provide a rationale for retail on main streets - which is where such retail services are normally located - but that needed analysis is simply not provided in the report. Equally absent is a comprehensive analysis of the neighbourhoods where walking access to retail is an issue, unlike in the City's central areas.

3. Consultation Process

Residents have frequently expressed concerns about the supposed “neutrality” of the City's survey undertaken in support of this and other initiatives, claiming that they display a bias towards the positive benefits, but minimize its negative impacts. We note that, perhaps for the first time, a group of residents (COTRA) has undertaken their own survey of residents, attempting a more balanced focus. Admittedly, some people claim that the residents' survey is biased on the other side, focusing on the disadvantages, rather than the benefits of the initiative! It may not be resolvable, but

the point is that more attention needs to be paid to the consultation process, and the fairness of the survey methods utilized.

The independent survey results indicate that most residents in affected areas are still unaware of the ongoing changes, raising concerns about whether the City has adequately informed participants about the potential negative impacts or how the City intends to address them.

In addition, we note that the City published a promotional section in several issues of the Toronto Star which was identified as “sponsored” but without disclosure as to whom the sponsor was. We feel that its source should have been disclosed. We are also of the opinion that this material was one-sided and amounted to “propaganda”.

4. Other impacts and their regulation

(1) The City cannot be depended upon to enforce noise control (or virtually any!) by-laws. Hours of operation are crucial. If the City cannot restrict the hours of operation of neighbourhood restaurant/bar to not past 11 PM, restaurants and bars should not be permitted.

(2) We are not in favour of allowing retail stores in neighbourhoods that require additional on-street parking, nor are we in favour of creating parking lots in residential neighbourhoods.

(3) With respect to retail in Neighbourhood Interiors, the proposed concept of Community Streets may look promising, but it may also be confusing to introduce new terms that are only to be used in the context of one bylaw? The proposed designated Community Streets have not been reviewed by residents, and therefore, the by-law is premature for adoption.

(4) The Major Streets map still has errors that need to be corrected (like the short portion of Avenue Road between Oxtown and Killbuck that has minimal through traffic).

Conclusions

Based on the above, we feel that City-wide permissions for major street re-zoning is likely supportable; for interior streets, it is not. The need for and justification for City-wide automatic as-of-right commercial permissions with some location limits (major streets, corners next to parks/schools) has not been shown.

Home Occupations (3)

The home occupation changes will permit usage in ancillary buildings (garages), will allow the following businesses to have clients: education use, artist studio, office, service shop or custom workshop. And will allow up to two employees plus the owner. So in terms of the planning objectives - some of them are being met through home occupations.

We request that Planning and Housing Committee:

- 5. Recommend that City Council direct the Chief Planner and Executive Director City Planning to consider the Neighbourhood Retail and Services on Major Streets and Neighbourhood Interiors proposals in the context of the development of a comprehensive Retail Services Strategy**
- 6. Recommend that City Council approve the Home Occupations proposal.**

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cc: Jason Thorne, Chief Planner and Executive Director, City Planning
Valesa Faria, Executive Director, Development Review
Kyle Knoeck, Director, Zoning and Secretary-Treasurer, Committee of
Adjustment, City Planning Division,
Carola Perez-Book, Project Manager, Zoning Section, City Planning Division,
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Margherita Cosentino, Senior Planner, Transportation Implementation Unit
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The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.