

PH25.3 - Community Within Reach: Expanding Housing Options in Neighbourhoods (EHON) Neighbourhood Retail and Services Study - Phase Three Final Report, Lenka Holubec, ProtectNatureTO

Attn:

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

Dear Chair, Vice Chair and Committee Members

I'm writing out of concern for the upcoming vote on the Neighbourhood Retail and Services proposal. These comments, additionally to the concerns expressed by many residents, including the Coalition of Toronto Residents Associations, focus on whether this proposal supports city's biodiversity along the environmental policies adopted into city along 3.4 THE NATURAL ENVIRONMENT and 3.2.3 PARKS AND OPEN SPACES in general.

These new uses as proposed could include bars, cannabis stores, restaurants, and delivery-based businesses — often with automatic patio rights. Residents are deeply concerned about noise, traffic, garbage, safety, and the loss of rent-controlled housing. We should also deeply concerned with potentially negative impacts of these new uses in respect to city's protected natural areas and wildlife habitat and the parks in general.

[Major streets are identified on Official Plan Map 3](#). These streets are not connecting just the neighbourhoods, people and business, but are located within city's natural heritage, the living ecosystems, wildlife corridors and critical habitats dispersed through the city: [Map 9: Natural Heritage System](#); [Map 12A: Environmentally Significant Areas](#) and [City Parkland](#).

In 2015, the City designated most of the city's ESAs and adopted protection policies to be in conformity with PPS 2014 now combined Provincial Planning Statement 2024. The OPA is in full force and effect - [OPA 262](#)

The assumption presented in [PH25.3 - Community Within Reach: Expanding Housing Options in Neighbourhoods \(EHON\) Neighbourhood Retail and Services Study - Phase Three Final Report](#) simply is that any or proposed commercial uses is just fine providing these permissions are to take place **“only on corner lots and properties next to parks, schools and existing commercial sites”**.

This proposal aiming to amend Zoning By-laws (“The three ZBLAs”) does not discriminate, whether “the park” includes protected natural Heritage - the ESA/ANSI or just any park, ravine, etc.

In case there is a proposed commercial use next to protected Natural Heritage (the ESA/ANSI/PSW) Natural Heritage, Impact Study should accompany any land use change within protected natural heritage adjacency (minimum distance 120m) to be in conformity with the policies adopted in OP Chapter 3 3.4 Natural Environment.

In this respect, the three ZBLAs may not be in conformity with the policies adopted in OP Chapter 3 3.4 Natural Environment.

Report does not consider a potential biodiversity loss due to neighborhoods intensification and provides no support for biodiversity.

Retail stores, restaurants, patios, etc. (such is the case of RABBA 7/24 across of High Park, ESA/ANSI) generate traffic, disturbance, noise, lights, pollution, interfere with wildlife connectivity corridors, greatly increase fatalities, undermine buffers, cause biodiversity decline).

Even if the proposed commercial use is located on property next to “any park” not covered by the special protections of OP Chapter 3 3.4 Natural Environment, it still should be evaluated along the COA process to assess if proposed use, such as bars, cannabis stores, restaurants, and delivery-based businesses will potentially impact negatively wildlife habitat, fauna/flora, respected residential uses (quiet nature relaxation, school children, seniors) and may add via waste and garbage rats related issues (toxicity when chemical tools, such as rodenticide baits used) impacting negatively wildlife in vicinity.

On Climate and resilience considerations

[PH25.3 - Community Within Reach: Expanding Housing Options in Neighbourhoods \(EHON\) Neighbourhood Retail and Services Study - Phase Three Final Report](#) assumes this proposal is justified by projections of future growth based on the existing population targets.

“Toronto is a growing city with at least 700,000 new Torontonians expected by 2051. It is expected that some of that growth, enabled through other Expanding Housing Options in Neighbourhoods (EHON) initiatives such as the Laneway Suites, Garden Suites, Multiplex and Major Streets studies, will be accommodated within Toronto's existing Neighbourhoods”

This Report also stipulates:

“The ZBLAs proposed by the EHON Neighbourhood Retail and Services initiative embrace the role complete communities play in offering a range of employment, housing and amenity options that are supported by active transportation and transit. Compact, well-connected Neighbourhoods reduce car dependency and enable people to live car-light or car free, which helps cut carbon pollution. The increased availability of goods

nearby to where people live may also contribute to the reduction in online shopping and delivery of goods which generates carbon emissions and packaging waste."

It does not consider high population growth demands on resources and industrial activities (more construction) as factors influencing negatively achieving net zero.

The Report seems to embrace the growth-based techno-aided assumptions narrowly reducing climate change impacts while increasing economic development. There is little consideration given to what extent is sustainability addressed at urban scale.

In conclusion, this a one-size-fits-all approach risks bringing disruptive uses into stable neighbourhoods and major streets vicinity instead of focusing new businesses where they're actually needed.

A more targeted, community-informed approach would make far more sense. Property owners already have a path through the Committee of Adjustment to apply for a change in use from residential to commercial, a process that approves over 90% of applications and allows for local input.

These comments do not support this proposal and stand with the Coalition of Toronto Residents Associations in asking Council to reject it.

The "one-size-fits-all" approach has been clearly voiced as inappropriate by many residents of this city.

Recommendations:

1 REFER this proposal for further considerations to ensure consistency with the OP/PPS 2024 in its entirety, including the laws adopted to protect natural environment (Chapter 3, 3.4 THE NATURAL ENVIRONMENT) and biodiversity.

2. Remove Neighbourhood Interiors from this proposal.

3. Adopt targeted approach to rezone only some Major Streets, based on need and in consultation with residents, resident associations, and Councillors

4. Maintain the COA process for change in residential usage.

5. Expand climate considerations to include to what extent is sustainability addressed at urban scale along this and other HAP EHON, HAPA proposals

Sincerely,

Lenka Holubec, on behalf of [ProtectNatureTO](https://www.protectnatureto.org/)

References:

City OP, Chapter 3 3.4 THE NATURAL ENVIRONMENT

"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 3, 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 3, 3-45

"Development or site alteration, with the exception of trails, where appropriate, and conservation, flood and erosion control projects, is not permitted on lands within the natural heritage system that exhibit any of these characteristics. Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas. New or expanding infrastructure should be avoided unless there is no reasonable alternative, adverse impacts are minimized and natural features and ecological functions are restored or enhanced where feasible. An impact study, as referred to in Policy 12, will be required for any proposed undertaking in those areas not already the subject of an Environmental Assessment under the Environmental Assessment Act." Chapter 3, 3-48

[To what extent is sustainability addressed at urban scale and how aligned is it with Earth's productive capacity?](#)

Living within the Earth's productive capacity (EPC) represents the goal for sustainability

EPC aligned tools and frameworks exist, but few policymakers use them as targets.

Single focus on carbon footprint underestimates the real impact of cities.

Identified leading cities' reductions are too low and too narrow to meet EPC goal.

[Global construction carbon footprint set to double by 2050](#)

As the world marks UN World Cities Day on 31 October—a call to make cities more sustainable—a new international study published in Communications Earth & Environment warns that the global construction sector's carbon footprint is on track to double by 2050, threatening to derail efforts to meet the Paris Agreement climate targets.

In 2022, more than 55% of the construction industry's carbon emissions stemmed from cementitious materials, bricks, and metals, while glass, plastics, chemicals, and bio-based materials contributed 6%, and the remaining 37% arose from transport, services, machinery, and on-site activities.

[How cities can achieve net zero by targeting building emissions from design to demolition](#)

Cities are at the epicentre of environmental impact and play a critical role in combating the climate crisis. They currently account for 70% of global CO2 emissions, primarily stemming from fossil fuels used in industrial processes, motorized transportation systems, and infrastructure constructed with carbon-intensive materials.

Reversing the adverse effects of the climate crisis on society, biodiversity and the economy is imperative.