

2025.10.27
Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

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

Dear Members of the Planning and Housing Committee,

I appreciate the opportunity to comment on Phase Three of the Neighbourhood Retail and Services Study – one of the City's most forward-looking and thoughtful planning initiatives under the Expanding Housing Options in Neighbourhoods (EHON) program.

The Study provides a balanced, evidence-based framework for reintroducing small-scale, non-residential activity into Toronto's residential fabric. It recognizes that complete communities depend on local spaces for work, creativity, and daily social exchange, and it positions Toronto as a leader in shaping resilient, mixed-use neighbourhoods.

City Planning staff deserve recognition for advancing this complex and politically sensitive initiative through careful consultation, data-driven analysis, and clear communication. I support the proposed zoning amendments as an important step toward enabling local economic opportunity and strengthening neighbourhood vitality. The following comments focus on implementation considerations intended to complement and bolster, rather than alter, the direction of the proposed amendments. They are offered in the spirit of constructive refinement – focusing on details that could help maximize the Study's success as it moves forward to adoption.

At a time when neighbourhood vitality, housing diversity, and local economic resilience are increasingly intertwined, this initiative offers a timely and practical path toward achieving the goals of the Official Plan and the Housing Action Plan (2023–2030). Delaying these permissions risks missing an important opportunity to align neighbourhood planning with current housing and economic realities, particularly as retail vacancies and small-business pressures continue to reshape main streets.

Major Streets: Enabling Corridor Activation

The proposed Major Streets zoning regulations provide a vital policy bridge between the city's residential fabric and its primary corridors. They introduce new as-of-right permissions for small-scale retail and service uses within residential zones fronting Major Streets, permitting uses such as retail stores, offices, personal service shops, and eating establishments within existing residential buildings or detached buildings on lots with a front or side lot line abutting a designated Major Street.

Each non-residential establishment is limited to 150 square metres of gross floor area, and the total combined non-residential area within a building may not exceed 150 square metres (400 square metres

in an apartment building, provided it occupies no more than 85 percent of the first storey). Main entrances must face and be within 6 metres of the Major Street frontage, and waste must be stored entirely within a wholly enclosed building or set back at least 1 metre from lot lines.

These provisions establish a strong foundation for corridor activation. As the City moves toward implementation, several refinements may be worth considering to enhance flexibility and ensure long-term success.

Building Types and Access

Many Major Streets include semi-detached, rowhouse, or multiplex dwellings capable of accommodating retail and service uses without compromising neighbourhood character. Allowing flexibility across these forms, where frontages and servicing permit, could further support gentle economic intensification while maintaining residential primacy. These permissions are inherently low-impact and tied to existing built form, ensuring that the character and scale of Neighbourhoods remain unchanged while allowing modest reinvestment.

Scale and Co-location

The 150-square-metre limit is appropriate for single establishments but may unintentionally constrain the adaptive reuse of larger buildings or multi-tenant configurations. Enabling shared workspaces, studio-café hybrids, and similar low-intensity models could strengthen business viability while maintaining compatibility.

Transit and Corridor Context

Given the expansion of Protected Major Transit Station Areas (PMTSAs) and the role of Major Streets as transit-supportive corridors, sites within 500 metres of higher-order transit could warrant expanded permissions or higher floor area thresholds. This would advance the Official Plan direction for transit-supportive, mixed-use corridors and walkable complete communities.

Design and Implementation

To reinforce high-quality integration, the City could develop Major Street Design Guidelines to address storefront transitions, signage, lighting, and landscaping. These would help ensure cohesive streetscapes and compatibility with adjacent Neighbourhoods.

Together, these considerations could help Major Streets evolve as fine-grained, mixed-use corridors that support daily needs, small-scale employment, and a strong sense of place—while preserving the stability and character of surrounding residential areas. The overall approach strikes an appropriate balance between flexibility and control, supporting gradual reinvestment while safeguarding neighbourhood character.

Neighbourhood Interiors: Strengthening Local Service Access

The proposed Neighbourhood Interior (Community Streets) zoning regulations represent another significant step forward, introducing small-scale commercial activity within the interior of Neighbourhoods. The proposed regulations state that a retail store is permitted within a detached house, detached houseplex, or non-residential building on lots that either: (1) are corner lots abutting a community street; (2) abut a public park or public school on the same street; or (3) abut a lot on the

same street zoned Commercial, Commercial Residential, Commercial Residential Employment, or Institutional.

Each establishment must be the only non-residential use in the building and must not exceed 110 square metres in floor area. These permissions are limited to the first storey and may include small-scale food service, restricted to hot or cold beverages and low-risk pre-packaged items.

This framework represents meaningful progress and provides a strong foundation. As implementation proceeds, there may be opportunities to broaden the permissions to reflect the diversity of Toronto's neighbourhood contexts. Neighbourhood-serving uses are not only about convenience—they also sustain local jobs, social interaction, and everyday vibrancy that contribute directly to neighbourhood well-being.

Range of Uses and Building Form

Allowing small offices, studios, and personal service shops—uses that have historically animated Toronto's residential corners—could further strengthen local service access and community vibrancy without creating new impacts.

Adjacency and Eligible Facilities

Expanding the adjacency condition to include libraries, recreation centres, childcare facilities, and places of worship could enhance equity and consistency. Clarifying that lots across the street from such facilities qualify, and that adjacency applies to any frontage of multi-fronted sites, would ensure fair application of the by-law.

Single-Use Limitation and Waste Enclosure

Allowing more than one non-residential use within a building would increase flexibility for adaptive reuse and small-business innovation. Similarly, excluding enclosed waste storage structures from lot coverage calculations would make compliance simpler and more practical.

Collectively, these refinements would support compatible reinvestment, local service access, and neighbourhood-serving economic activity in a manner consistent with the Official Plan's intent to balance residential stability with modest mixed-use reinvestment. Together, the Major Streets and Community Streets frameworks create a balanced system for local economic activation. Extending this framework to ancillary buildings represents the next logical step.

Ancillary Uses: Unlocking Laneway and Rear Lot Potential

The proposed updates to Section 150.5 (Home Occupation) of the Zoning By-law formally allow home occupations within dwelling units, living accommodations, and ancillary buildings—including garages, laneway suites, and garden suites—provided the dwelling unit remains the principal residence of the operator. This is among the most forward-looking and pragmatic aspects of the Study, opening new pathways for adaptive reuse, entrepreneurship, and local employment within Toronto's extensive laneway network.

Home occupations may now employ up to two persons beyond the operator and, for uses such as artist studios, offices, and custom workshops, may receive clients or customers. A lawful parking space in an ancillary building may also be converted to floor area for a home occupation without replacement

parking. These permissions modernize the City's regulatory framework in line with contemporary home-based work and small-scale entrepreneurship trends.

Ownership and Accessibility

Under the current definition (Reg. 800.50(345)), a home occupation must be operated by a resident of the dwelling. Allowing shared or tenant-operated workspaces in ancillary buildings—subject to clear performance standards—could expand access to affordable, small-scale workspace while maintaining residential primacy.

Regulation of Employment

Limiting employment to two persons beyond the operator may be overly prescriptive. A performance-based approach, regulating measurable impacts such as noise, traffic, and hours of operation, would better reflect how modern small enterprises operate. These permissions would remain clearly secondary to the residential use of the property and governed by objective, enforceable standards, ensuring they complement rather than compete with the character of surrounding homes.

Visitor and Activity Restrictions

Permitting visitors, clients, and deliveries under clear operating standards could help these uses function effectively while remaining compatible with their surroundings.

A Context-Sensitive Approach to Compatibility

Compatibility in laneway and rear-lot environments depends primarily on adjacency, access, and visibility rather than use type. Toronto's 2,400 kilometres of laneways contain thousands of buffered, independently accessed structures ideally suited to low-impact activity.

Permissions could scale accordingly:

- Edge conditions adjacent to Mixed Use Areas or Major Streets could support studios or small service uses;
- Corner lots could accommodate slightly more active or visible uses; and,
- Mid-block conditions could remain best suited to appointment-based or production-oriented work.

This context-based approach would preserve neighbourhood character while enabling flexibility where it fits best.

Implementation: Coordinated Rollout and Evaluation

Effective implementation will be key to realizing the Study's full potential. Pilot projects, demonstration sites, and interdivisional collaboration between various City departments could help refine the framework over time. A performance-based approach—focused on measurable outcomes rather than prescriptive criteria—would ensure adaptability across Toronto's diverse neighbourhoods and allow staff to adjust as real-world experience accumulates. Taken together, these measures represent a

balanced evolution of the City's planning framework—one that supports neighbourhood adaptability without compromising stability.

Closing Remarks

Phase Three of the Neighbourhood Retail and Services Study demonstrates the City's leadership in modernizing how residential neighbourhoods evolve to support complete communities. I support adoption of the proposed Zoning By-law amendments as a major step toward enabling gentle economic intensification, local entrepreneurship, and social connectedness across Toronto's neighbourhoods.

The recommended refinements identified above are intended to strengthen implementation and long-term success. With Council's approval, these policies can unlock the latent potential of Toronto's residential areas—allowing small-scale enterprise, community services, and creative workspaces to coexist harmoniously with housing.

Approval of this initiative will mark a significant milestone for the EHON Initiative and for Toronto's broader efforts to build complete, connected, and resilient neighbourhoods that integrate living, working, and community life.

Thank you for your consideration and for your continued leadership in advancing this important initiative.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Scorgie', with a stylized flourish at the end.

Blair Scorgie

M.Arch., B.U.R.Pl., MCIP, RPP

Managing Principal

Scorgie Planning

blair@scorgieplanning.com

www.scorgieplanning.com