

Feasibility Assessment of the St. James Town Food Hub

Date: October 28, 2020

To: Economic and Community Development Committee

From: Executive Director, Social Development, Finance and Administration

Wards: Ward 13, Toronto Centre

SUMMARY

The St. James Town neighbourhood is bounded by Bloor Street East to the north, Parliament Street to the east, Wellesley Street East to the south and Sherbourne Street to the west. Though the area is densely populated, it is served by only two grocery stores. These stores offer important food access points, but these retailers alone do not ensure affordable access to healthy and fresh food for all residents of the neighbourhood, particularly those with lower incomes. A neighbourhood food hub model in this area may help to address food insecurity concerns among the community.

The St. James Town Community Co-operative has proposed the creation of the OASIS Food Hub. The food hub proposal involves several components including a community food space that offers food storage and distribution, a commercial kitchen and food production underground, at-grade and on a building rooftop, as well as a permanent retail structure.

The purpose of this report is to provide the findings of the review of the actions and approvals necessary for: a) the creation of an underground aquaponics farm at 325 Bleecker Street, a Toronto Community Housing Corporation Building and b) a location for the OASIS Food Hub for the production, distribution and management of food and water in St. James Town. This report assesses the feasibility of the various components of the OASIS Food Hub proposal and highlights the need for local food partnerships between community agencies to address food insecurity in St. James Town. Overall, City staff found the proposal for the aquaponics farm and bio-digester not feasible while the other components may be possible if required re-zoning is obtained in some instances.

There are two appendices attached to this report. Appendix A outlines potential residential zoning issues related to food hub activities, and Appendix B is a non-exhaustive list of relevant governing bodies, legislation and regulations related to the development of an aquaponics farm.

RECOMMENDATIONS

The Executive Director, Social Development, Finance and Administration recommends that:

1. City Council direct the Chief Planner and Executive Director, City Planning, in consultation with the President and Chief Executive Officer, Toronto Community Housing Corporation, and other City divisions as required, to work with the successful proponents to determine the necessary municipal planning approvals that could allow for an integrative food partners framework in the Toronto Community Housing Corporation's buildings at 275, 325, and 375 Bleecker Street and 200 Wellesley Street East in St. James Town, with a specific focus on Phases 0.5 (Preparing for a Neighbourhood Food Hub), 1 (Neighbourhood Food Hub Programming), and 4 (Rooftop Food Production and Permanent Retail Space), as outlined in this report.

FINANCIAL IMPACT

There is no financial impact resulting from the adoption of the recommendation in this report.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial impact information.

EQUITY IMPACT STATEMENT

The Neighbourhood Food Hub model has been analysed at the conception & initiation stage for potential impacts on Indigenous, Black and Equity-seeking groups of Toronto. A Neighbourhood Food Hub should increase access to affordable and nutritious food for community residents and, help to better coordinate food programs and service delivery in the St. James Town community. Improved access to affordable, nutritious food will benefit women, immigrants, refugees, undocumented individuals, vulnerable seniors, vulnerable youth, Black, Indigenous and racialized residents in the St James Town neighbourhood.

This report is in line with the Confronting Anti-Black Racism Action Plan recommendation number eight; to improve food access for low income Black Torontonians. (1) It is also in line with The Toronto Indigenous Health Strategy strategic direction number two which includes strategies to increase access to affordable, healthy food. (2)

1 <https://www.toronto.ca/legdocs/mmis/2017/ex/bgrd/backgroundfile-109127.pdf>

2 <https://www.toronto.ca/legdocs/mmis/2016/hl/bgrd/backgroundfile-93077.pdf>

DECISION HISTORY

At its October 2019 meeting, City Council adopted motion MM10.3 requesting the review of the required actions and approvals necessary to facilitate the creation of an aquaponics farm at 325 Bleecker St as well as a location for the OASIS Food Hub in St. James Town. The City Council Decision is available here:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.MM10.13>

COMMENTS

The proposed site for the OASIS Food Hub is in the St. James Town area bounded by Bloor Street East to the north, Parliament Street to the east, Wellesley Street East to the south and Sherbourne Street to the west. According to the 2016 TOCore study, St. James Town has the second highest population density in the Downtown core with 26,000 people living in the neighbourhood. (3) Much of the housing in the area is provided by 18 high-rise apartment buildings ranging from 14 to 32 storeys, all generally built in the early 1960s and mid-1970s. Four of these buildings are Toronto Community Housing buildings at 275, 325, 375 Bleecker Street and 200 Wellesley Street East.

Food Insecurity in St. James Town

St. James Town, though densely populated, is served only by two grocery stores. Although these stores offer important food access points, these retailers alone do not ensure affordable access to healthy and fresh food for all residents of the neighbourhood, particularly those with lower incomes. Residents in this neighbourhood tend to be low income, new immigrants and families with young children from very diverse backgrounds. Demographic and neighbourhood data shows that the area has a high percentage of people over 65 years and a high number of children 0-9 years. The area also has the highest number of persons living below the Low Income Measure-After Tax (LIM-AT) and the level of unemployment is second highest in the downtown core. Nearly a quarter of those who are employed have only part-time employment.

Food is one of the many basic expenses for which low-income households struggle to meet. For several years, Toronto Public Health has been involved with a "Nutritious Food Basket" research initiative that measures the minimum cost for a person or family to purchase healthy food. In 2019 the report indicated that approximately 64% of residents who rely on social assistance experience food insecurity, which can lead to an increased risk of chronic disease, depression, anxiety and mortality. (4) Food insecure households are often forced to use their food budget to pay for other expenses. As a result, these households tend to resort to nutrient-poor foods and emergency food services. (5)

3 <https://www.toronto.ca/wp-content/uploads/2017/12/9386-city-planning-to-core-neighbourhood-population-profiles-aoda-07-04-2016.pdf>

4 <https://www.toronto.ca/community-people/health-wellness-care/health-programs-advice/nutrition-food-basket/>

5 <https://www.toronto.ca/legdocs/mmis/2019/hl/bgrd/backgroundfile-138987.pdf>

St. James Town's high population density and prevalence of low income and food insecure households present notable challenges in securing affordable, accessible and culturally-appropriate foods for its diverse community. The rising cost of food will also have a disproportionate impact on residents who already face food insecurity.

All of these factors suggest a targeted approach is needed to combat food insecurity in a community that already faces heightened vulnerability to external shocks and emergencies.

Neighbourhood Food Hub Model

As a result of the pressing food security needs of the St. James Town neighbourhood, City staff recommend a Neighbourhood Food Hub. This food hub must be built on partnerships between local community organizations and residents with support from Toronto Community Housing and relevant City divisions. This is in alignment with the OASIS Food Hub proposal Phase 0.5 and 1.

Neighbourhood Food Hubs can serve a multitude of non-stigmatizing functions for residents, including food access, wrap-around social services and workshops dedicated to, for example, fostering food security, social enterprise, food gardening, and intergenerational cooking for newcomer families. In 2018, the Social Development, Finance and Administration Division supported the creation of the Neighbourhood Food Hub Model at Glen Rhodes Church 1470 Gerrard Street East in the Coxwell-Gerrard community in Toronto.⁽⁶⁾ This food hub model has demonstrated success in promoting access to food and supporting broader community initiatives.

For example, in response to COVID-19, the Neighbourhood Food Hub mobilized to provide emergency food support to residents in need. ⁽⁷⁾ This included delivering food bank baskets with fresh produce to seniors and vulnerable families, and delivering freshly prepared meals, frozen meals and emergency food. The hub coordinated food supports in partnership with various organizations including Applegrove Community Complex, FoodShare Toronto, and Feed it Forward. The success of the Neighbourhood Food Hub model is built on partnerships and coordination between multiple stakeholders and agencies in the community. This model has the potential to be replicated across the City, supporting the goals of emergency preparedness, resilience and many City strategies.

Toronto Community Housing Integrative Food Partnership in St. James Town

Toronto Community Housing is issuing a Request for Expression of Interest for community agencies or groups to submit proposals to develop a collaborative framework for an integrative food partnership in St. James Town. The successful proponents may have access to available Toronto Community Housing space and resources in order to address food insecurity in St. James Town. Toronto Community Housing will evaluate the proposals based on the required space, programming model and business case. Further information will be provided once the open call is issued by Toronto Community Housing later this year.

6 <https://www.toronto.ca/legdocs/mmis/2020/ec/bgrd/backgroundfile-141436.pdf>

7 <https://www.neighbourhoodfoodhub.com/>

Oasis Proposal and Feasibility

In response to the food insecurity in St. James Town, local community groups have taken action. This includes the St. James Town Community Co-operative that has operated food initiatives since 2015. The co-operative evolved from a resident led initiative to create a community café back in 2011, offering healthy and affordable meals for neighbourhood residents. More recently, the St. James Town Community Co-operative developed a proposal for the OASIS Food Hub that aims to meet local demands for access to healthy and affordable food through a neighbourhood food hub and local food production. The proposal is divided into 5 phases:

- Phase 0.5: Preparing for a Neighbourhood Food Hub
- Phase 1: Neighbourhood Food Hub Programming
- Phase 2: Food Production
- Phase 3: Composting & Bio-digestion
- Phase 4: Rooftop Food Production & Permanent Retail Space

A fulsome consultation was conducted, over several months, with staff from relevant City divisions and Toronto Community Housing to assess and give feedback on the feasibility of the OASIS proposal. Staff from a combination of these City entities included: City Planning, Toronto Buildings, Parks, Forestry and Recreation, Poverty Reduction Strategy Office, Toronto Public Health and Toronto Community Housing. Below is a summary of the feasibility findings which evaluates each phase of the OASIS Proposal and ranks its feasibility.

Summary of Feasibility Findings

Feasibility Criteria	Phase 0.5 Preparing for a Neighbourhood Food Hub	Phase 1 Neighbourhood Food Hub Programs	Phase 2 Food Production	Phase 3 Composting and Bio-digestion	Phase 4 Rooftop Food Production and Permanent Retail Space
Description	Community and workshop office within or near Toronto Community Housing building and food buying club.	Launching food hub in shipping container with food storage and distribution space, and commercial kitchen.	Underground aquaponics farm and indoor mushroom farm at 325 Bleecker Street, a Toronto Community Housing building.	On-site bio-digestion to offset energy use, provide emergency back-up power and create compost at 325 Bleecker.	Develop at-grade and rooftop gardens plus a permanent retail space to grow and sell produce.
Technical	Requires space, shipping containers that move to		Residential and	Bio-digestion cannot be	Re-zoning required.

	three locations in the neighbourhood during construction, craning to move the containers and utility connections at each site.	agricultural uses cannot be housed in the same space as per the Ontario Building Code.	located near residential areas as per the Nutrient Management Act	Residential zoning does not permit a Market Garden.
Costs to Develop*:	Approx. \$519,000 (appears to be a low-end estimate)	Approx. \$1.7 Million (appears to be a low-end estimate)	Approx. \$1 Million (appears to be a low-end estimate)	Approx. \$2.5 Million
Operating Costs*:	Approx. \$125,000 for first year (appears to be a low-end estimate)	Approx. \$450,000 annually (appears to be a low-end estimate)	Approx. \$10,000 annually (appears to be a low-end estimate)	TBD
Timeline	9 to 21 months	N/A	N/A	5 years
Ranking	Feasible if necessary planning approvals are obtained and updated costs estimates are completed and	Not feasible	Not feasible	Only feasible with zoning change

*All costs are estimates provided by the St. James Town Community Co-operative and are very conservative. Staff recommend a cost escalation of at least 30% in each of these phases.

Feasibility Assessment of the OASIS Food Hub Proposal by Phase

Phase 0.5 and 1: Preparing for a Neighbourhood Food Hub and Programming

These two phases are comprised of developing a community food hub in a shipping container or in a ground level space within a Toronto Community Housing building in the neighbourhood. The programming for the hub includes a bulk food buying club, a food storage and distribution space, and a commercial kitchen. Due to ongoing and future construction in the parking garage of the Toronto Community Housing buildings and the surrounding greenspace, the St. James Town Community Co-operative has proposed to locate these programs in a shipping container. This shipping container would be placed in three different locations over the duration of construction. The group proposed that the first location would be by the outdoor pool near 200 Wellesley Street East, then moved a little north next to 325 Bleecker Street and finally, in the area at Ontario Street and Wellesley Street East. Moving the shipping container will require craning and site utility servicing for water and electricity at each new site, triggering additional costs.

According to the St. Jamestown Community Co-operative, the estimated combined cost of Phase 0.5 and 1 is over \$644,000 including \$125,000 in operating costs for the first year. These costs are considered very conservative and have not properly factored in planning fees, studies, legal agreements and site plan agreements that need to be put in place. For instance, the cost cited by the community group for zoning, legal, and consulting fees is only \$15,000 however, the site plan control application fees alone start at \$22,000 not including any consultants, legal agreements or planning studies. (8) Given the additional costs related to craning, utility servicing and construction delays, a cost increase of at least 30% is anticipated.

The timeline provided by the proponents is 9 to 21 months, 9 months to get the shipping container placed next to 200 Wellesley Street East and 12 months to start programming. This time estimate does not include the timeline to get the necessary regulatory approvals in place and site plan agreements usually take 12 months to approve.

A key requirement for both phases is space and Toronto Community Housing is currently undertaking an inventory of spaces in and around their four St. James Town buildings to determine where non-profit food partners could be located to offer programming. Based on the spaces available, as noted above, Toronto Community Housing is preparing a Request for Expression of Interest call for local community agencies looking to provide food programming. Interested agencies can respond with details on their services, provide updated start up and operating costs, and identify sources of funding.

The Apartment Neighbourhood polices in the City's Official Plan are supportive of small-scale commercial, community and institutional uses and outdoor food garden cultivation. (9) However, under Zoning By-law 569-2013, the Toronto Community Housing buildings at 275, 325, 375 Bleecker Street and 200 Wellesley Street East are zoned "Residential" which allows for the residential and residential-related uses. (10) Staff from City Planning and Toronto Buildings have indicated that it is not clear to what extent the Residential zoning, which currently applies to the area, would allow the activities proposed. Appendix A outlines types of uses that the activities of the neighbourhood food hub may fall into and potential changes to zoning that would be required.

Phases 0.5 and 1 are considered feasible if the necessary planning approvals for the different proposed uses are obtained. Clarity on the desired uses and further study is necessary to determine the use classification of the proposed activities, the requirement for a zoning by-law amendment application, the feasibility associated with a zoning by-law amendment application, and determination of whether the site will be subject to the City's site plan approval process. The St. James Town Community Co-operative would

8 <https://www.toronto.ca/city-government/planning-development/application-forms-fees/fees/>

9 St. James Town is designated as *Apartment Neighbourhoods* in the Official Plan. See Official Plan Policies 10 and 11, Chapter 2.3. <https://www.toronto.ca/wp-content/uploads/2017/11/9048-cp-official-plan-chapter-2.pdf>

10

https://www.toronto.ca/zoning/bylaw_amendments/ZBL_NewProvision_Chapter10.htm

also need to complete updated cost estimates in order to move forward. If the community food hub includes a commercial kitchen and selling of any produce, zoning approvals may be necessary for these uses and permission for operating the space in this way must be granted by Toronto Community Housing.

Phase 2: Food Production

In this phase, the OASIS Food Hub would expand to develop an underground aquaponics farm and an indoor mushroom farm. The proposed site for this is in the underground space and pool at 325 Bleecker Street, a Toronto Community Housing building. This underground pool was identified as the potential site for the aquaponics farm. The size of this underground pool is 60 ft. by 40 ft. and the total area is 2,400 square feet.

According to the OASIS Food Hub website, aquaponics is "[a] semi-closed system in which plants and fish live in a symbiotic relationship. The system combines aquaculture (fish farming) and hydroponics (growing plants in water)." (11) Mushroom farming can be done indoors in low light but a major requirement is cold storage as the shelf life can be quite short. The OASIS proposal includes harvesting produce, primarily lettuce, mushrooms, and fish, rainbow trout in particular, to sell to co-op members in the community at a reduced cost.

Based on estimates provided by the St. James Town Community Co-operative, the cost to develop these two facilities is over \$2.1 million and this includes operating costs for the first year of \$450,000. This cost appears very low given level of regulatory approvals, technical studies and construction that would be required. For instance, just retrofitting the pool at 325 Bleecker Street including accessibility upgrades, architectural finishes, and pool mechanical equipment could cost between \$750,000 and \$1.25 million. Currently, the underground garage at 325 Bleecker Street is undergoing construction with a multi-level, phased slab repair and replacement by Toronto Community Housing. During this construction project, the pool cannot be accessed and a significant amount of additional planning and funding would be required to retrofit the pool for use as an aquaponics farm as well as ensure the safety and security of the space. In addition, introducing aquaponics would increase the pressure on energy and water utility costs at the building.

The timeline to develop the proposed 6,458 square foot, commercial size aquaponics farm could take several years and is not a feasible endeavor. The proponents need to consider the required regulatory approvals at the Federal, Provincial and Municipal level as well as planning, design, retrofit of the existing building, and construction of the two new facilities, final inspections for health and safety, and then actual operations. This does not include any delays that might occur due to COVID-19.

In comparison, Scadding Court Community Centre located at 707 Dundas St West houses a small, 297.5 square foot, aquaponics demonstration project launched in 2016. The cost to develop this size of a facility was approximately \$30,000 and it currently requires two part-time staff as well as one or two regular volunteers to operate. Annual operating costs are estimated at \$14,500 which is comprised of mainly labour and a

11 <http://www.oasisfoodhub.ca/home/oasis-core-elements/>

small amount for fish feed as well as seeds. The cost of this aquaponics farm is about \$139/per square foot including operating costs.

Approvals for the aquaponics demonstration project at Scadding Court Community Centre took at least five years with conversations on zoning approvals dating back to early 2011. The zoning by-law under which this aquaponics demonstration project was approved has since been changed with the updates to the zoning by-law in 2013. Once approvals were in place, this site took 12 months to develop. As this site does not include any residential uses and is considered a small demonstration project, with no food processing, the approval pathway is much simpler than the proposed OASIS Food Hub aquaponics farm.

Regulatory approvals of an aquaponics farm of the scale proposed by the St. James Town Community Co-operative present a significant challenge. There is no one governing body for aquaponics in Ontario or Canada. Based on research undertaken by staff, it seems there are approvals required at the Federal, Provincial and Municipal level. Appendix B outlines, to the extent possible, the different governing bodies and regulations that need to be reviewed and complied with in order to develop an aquaponics farm of the size proposed. Below are select regulatory hurdles that make the proposal for aquaponics unviable.

Municipal

The proposed aquaponics farm would likely be determined to be an "agricultural use" (16) and the mushroom farm may be determined to be an agricultural use or market garden use, both of which are not listed in the Residential Zone and therefore not permitted.

Provincial

There are a number of provincial ministries that should be involved in the approval process of an aquaponics farm within 325 Bleeker Street. The closest provincial approvals would be under the Province's rules for greenhouse operators (12) and aquaculture licenses (13) as an approvals process for aquaponics is not expressly provided at any level of government. As the Phase 2 proposal is essentially to construct a new indoor farm within a residential apartment building, the Ontario Building Code applies. The closest definition in the Ontario Building Code that relates to an aquaponics farm is a "farm building". As per Article 1.3.1.2. of Division A, of the Building Code:

Farm building means all or part of a building,

(a) that does not contain any area used for residential occupancy,

(b) that is associated with and located on land devoted to the practice of farming, and

(c) that is used essentially for the housing of equipment or livestock or the production, storage or processing of agricultural and horticultural produce or feeds.

Based on the Ontario Building Code, a farm building cannot have any area with residential occupancy, must be located on or associated with land designated for farming, as defined in the Building Code. Further, in a 2015 hearing at the Ontario Building Code Commission, there was a dispute involving two buildings that would

12 <https://www.ontario.ca/page/rules-greenhouse-operators>

13 <https://www.ontario.ca/page/aquaculture-and-fish-stocking-licences>

house aquaponics farms qualified as farm buildings in the City of Hamilton. In this dispute, the Commission ruled that the buildings complied with the definition of farm buildings in the Building Code. (14) Applying this ruling to the aquaponics proposal in St. James Town means that it does not satisfy any of the requirements and would fail to meet the Ontario Building Code.

Since the Ontario Building Code prohibits agricultural and residential uses to be in the same building, irrespective of municipal planning documents like the official plan and zoning by-law, this proposal cannot contravene provincial legislation.

Therefore, staff have assessed that given the building code, required approvals, and cost, the aquaponics farm is not feasible in the Toronto Community Housing Building at 325 Bleecker Street.

Phase 3: Composting and Bio-digestion

In Phase 3, the group proposed to retrofit the underground space in the building at 325 Bleecker Street with onsite bio-digestion to offset energy use, provide emergency back-up power, and create compost. Bio-digestion known as anaerobic digestion is the process of using organic matter such as solid effluent to produce biogas like methane which is then used in a cogeneration system to provide electricity and heat to the facility as well as emergency backup power. The estimated cost for this system provided by the St. James Town Community Co-operative is almost \$1 million. This cost appears to be low in comparison to the level of regulatory approvals, technical studies and construction that would be required. The timeline to approve of such a system could take several years due to the regulatory approvals, planning, design, retrofit, and commissioning of the new system.

Although bio-digestion was proposed to offset increased utility costs, 325 Bleecker St is actually electrically heated. This means the current power and heating system in the building would need to be switched to natural gas to take advantage of the benefits of a cogeneration system. This would require an assessment of whether this switch would be in line with the City's TransformTO low carbon goals. In addition, this retrofit would be costly and only makes economic sense when the back-up power generator is coming to the end of its useful life. The cost to switch the building to natural gas, install new piping and a cogeneration plant would be in the several millions. Many regulatory approvals and technical feasibility studies are required to connect the cogeneration plant to the electricity grid including Ontario Energy Board (15), Toronto Hydro (16), and Environmental Compliance Approval.

A significant concern would be the safety risks associated with having an underground or an at grade level bio-digester, specifically with its close proximity to the open community space just south of the building. In addition to combustibility risks due to the production of methane gas, there is a potential risk to produce other dangerous gases that can lead to serious health impacts and these contaminants could then be released

14 <http://www.mah.gov.on.ca/Page11348.aspx>

15 https://www.oeb.ca/documents/cases/EB-2005-0447/appendixf_201206.pdf

16 <https://www.torontohydro.com/grid-connections/connection-process>

in the air or discharged into the environment. (17)

Municipal - Official Plan

The Official Plan designates this specific area of St. James Town, as *Apartment Neighbourhoods*, which does not permit industrial uses; industrial uses are incompatible with residential uses.

Provincial

Anaerobic digestion is regulated under the Provincial Nutrient Management Act and the Environmental Protection Act. In the Nutrient Management Act, a "farm unit" is defined as land used for agricultural operation such as aquaculture. In Part 9.1, Article 98.2.1 of this Act, there is a requirement for anaerobic digestion facility to be setback more than 450 meters from a residential area, commercial space, community or institutional use on a farm unit. There are also Renewable Energy Approvals in the Environmental Protection Act that apply if the area is not considered a farm unit however, as noted in Phase 2 the aquaponics farm would require agricultural use zoning.

Since the Nutrient Management Act prohibits residential uses within 450m of a farm unit, regardless of municipal planning documents like the official plan and zoning by-law, this proposal cannot contravene provincial legislation.

In conclusion, this phase is not feasible due to the cost, required regulatory approvals, safety risk, and technical compatibility.

Phase 4: Rooftop Food Production and Permanent Retail Space

As part of this phase, the St. James Town Community Co-operative intends to develop at-grade and rooftop gardens as well as a permanent retail space to grow and sell produce. The estimated cost for this phase as provided by this group is \$2.5 million and the timeline to develop this phase of the proposal could take five years.

In terms of Zoning By-law 569-2013, the rooftop gardens would likely be determined to be a market garden use which as stated previously is not listed in the Residential Zone and therefore is not permitted. Permanent retail space would likely be determined as a "retail store" use which is defined as "premises in which goods or commodities are sold, rented or leased." and is listed in the Residential Zone and permitted with conditions.

The technical feasibility of retrofitting a building with a green roof would need to be assessed and the retrofit must comply with the Toronto Green Roof Construction Standard (18) and the Ontario Building Code. A Green Roof Building Permit is required and can be obtained by submitting an application with all drawings, plans, engineering studies and other documentation as required to the Toronto Buildings department. The planting of produce would require additional reinforcement for the roof and would further increase the cost.

17 <http://www.omafra.gov.on.ca/english/engineer/facts/15-031.htm#9>

18 <https://www.toronto.ca/wp-content/uploads/2017/08/7eb7-Toronto-Green-Roof-Construction-Standard-Supplementary-Guidelines.pdf>

Further study is necessary to determine the use classification of the proposed activities and developments, the requirement for a zoning by-law amendment application, and the complexity, feasibility associated with a zoning by-law amendment application and a determination of whether the site will be subject to the City's site plan approval process. Overall, the feasibility of this Phase is dependent upon the outcomes of the necessary municipal planning approvals including a zoning change as well as the technical and structural feasibility of the building selected for a green roof. Phase 4 should be considered after Phases 0.5 and 1 become operational, and an assessment of the impact of these phases can be made. A potential retail space may become available in the area however the timeline for the construction of that space is in 2025.

Next Steps

The Request for Expression of Interest from Toronto Community Housing for an integrative food partnership framework to address food insecurity in St. James Town will be issued later this year. It creates an opportunity for the e St. James Town Community Cooperative to participate using phases 0.5 and 1 of their food hub proposal as part of their application as these components are considered feasible, if the necessary planning approvals are obtained.

CONTACT

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SIGNATURE

Denise Andrea Campbell
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ATTACHMENTS

Appendix A: Potential Residential Zoning Applicable to Food Hub Activities

Appendix B: Non-exhaustive list of relevant governing bodies, legislation and regulations, at all levels of government, related to the development of an aquaponics farm