



November 10, 2025
Toronto City Council
100 Queen Street West
Toronto, ON M5H 2N2

Dear Mayor Chow and Members of City Council

RE: PH25.3 Neighbourhood Retail and Service Study – Phase Three Final Report

The Neighbourhood Retail and Service (*NRS*) proposal represents the most significant change to Toronto's residential zoning in seventy years. On behalf of the Coalition of Toronto Residents' Associations (COTRA), this letter outlines concerns about the proposal's shortfalls and, respectfully offers recommendations to Council when it votes on November 12th.

Based on extensive resident feedback obtained with our city-wide survey, COTRA recommends:

1. Remove Neighbourhood Interiors from the proposal and from future consideration.

Residents are clear: retail and commercial don't belong on quiet residential streets.

- 90% of survey respondents oppose changing zoning rules to allow businesses to operate in Neighbourhood Interiors without consultation or approval.
- 80% want the city to stop proposing bylaw changes that would permit businesses to operate in residential neighbourhoods.

2. Adopt a targeted approach for rezoning some Major Streets based on demonstrated need and developed in consultation with residents, Residents' Associations, and local ward councillors.

- 57% of survey respondents supported this measured approach.

Suggested criteria:

- Limit retail conversion to stretches of Major Streets more than 500m from an existing Main Street or plaza—this is the same distance Planning prescribes in its report (p. 19).
- Streets having sidewalks and safe pedestrian access.
- Streets serviced by transit.
- Permit retail on the ground floors of apartment buildings citywide.

3. Prioritize the development and support of existing commercial areas.

City investment and small-business supports should concentrate on established retail corridors, not on converting existing housing in other areas.

- 80% of respondents support this rationale.

Background and Context

Last December, Council voted 18–1 to defer the earlier proposal back to Planning with clear directions:

1. Conduct meaningful consultation with residents and residents' associations.
2. Communicate the proposal clearly through mainstream media to gather informed feedback.

Regarding the Neighbourhood Retail and Services Study - Phase Three Final Report (The Report):

What's Changed

1. Patios are no longer permitted "as of right" in Neighbourhood Interiors. However, once open, a business can apply for a patio through the Committee of Adjustment.
2. While the new classification, "Community Streets" saw a 75% reduction in eligible interior streets, that reduction only applies to corner lots. All properties beside parks and schools remain eligible for rezoning. Moreover, the Report states it will 'look for opportunities' to expand Community Streets in the future, suggesting this 'reduction' is only temporary.

What Hasn't Changed

The proposal is far broader than local cafés and grocery stores. It rezones all residential properties on streets classified as "Major." For example, Parkside Drive, Guildwood Parkway and much of Royal York Road are quiet residential streets, yet every home would be eligible for commercial conversion and a patio by right.

Homeowners have not been notified of this possibility; their neighbours could open a bar or restaurant without recourse.

Importantly, the same core problems remain in the proposal – with no new guardrails being proposed to address many identified adverse impacts affecting tens of thousands of houses city wide including:

- Disturbances from late-night operation for bars
- Restaurants serving alcohol with front or side patios
- Take-out eateries offering home delivery
- Additional cannabis shops
- Enforcement capacity
- Tenant evictions for houses converting to retail/commercial.

COTRA Survey Results

By August, it became clear that most residents were unaware of the Planning's outreach, the proposal or its full scope. In response, a coalition of residents' associations from across the city, **COTRA**, came together to inform residents about the proposal and gather meaningful feedback.

COTRA conducted a thoughtful, unbiased citywide survey (focusing on the technical details of the same proposal consulted on by the city) listing every affected Major Street, by Ward. It received **3,400 responses** and **3,700 written comments** in two weeks, far exceeding the City's reach in two months. See Appendix 1 for details.

COTRA survey results:

- 90% opposed rezoning Neighbourhood Interiors.
- 77% opposed rezoning on Major Streets.
- Only 9% of residents—barely 300 across the entire city—received any emails or written materials from City Planning, and just 7% saw anything in social or traditional media.

Residents repeatedly voiced their concerns about bars, patios, cannabis shops, take-out restaurants, noise, rats, and traffic being introduced in their quiet neighbourhoods. Written comments showed they questioned why Toronto would propose converting housing to commercial use while main street vacancies are abundant.

Their message is clear: residents aren't buying what Planning is selling.

Consultation Gaps

In our view, Planning's outreach was primarily a marketing campaign:

- Materials showed cafés and grocery stores but omitted key details about what 'as-of-right' would mean to residents.

- There was no mention of controls and guardrails, nor references to bars, patios, or cannabis shops potentially operating next door.
- A Toronto Star advertorial sponsored by Planning presented the proposal's benefits but made no mention of zoning impacts or potential neighbourhood effects. See Appendix 2.
- The Report cites "digital reach" and "impressions" as proof of consultation — in our view, these are advertising metrics, not evidence of understanding.
- Importantly, maps of Major Streets omitted many street names making the maps difficult to interpret, leaving residents uncertain if *their* streets were affected.

COTRA had earlier requested a list of Major Streets by ward; Planning could not provide one.

In contrast, COTRA's survey included individual Ward maps showing all Major Streets -- so residents could visualize what has been proposed in their neighbourhood.

Planning's Interpretation of Support

The Planning Report gives little credence to COTRA's survey (one sentence) despite its data showing overwhelming opposition to the proposal.

The Report characterizes the consultation results as "mixed," acknowledging both support and opposition but offering no clear summary of how concerns were evaluated. It recognizes that Resident Associations were largely opposed, yet emphasizes "overall support" for the initiative. While the Report notes concerns about cannabis and alcohol sales these issues are largely dismissed on the basis that such businesses are already "permitted uses." This selective interpretation minimizes the extent of resident opposition and oversimplifies the consultation feedback.

COTRA Key Concerns

1. Loss of Housing, Evictions, Risks on Main Street

Under Ontario's *Residential Tenancies Act*, landlords may legally evict tenants to convert units to commercial use. The Report offers no analysis of potential housing loss, overlooking Council's stated priority to protect rental supply.

Meanwhile, lower rent alternatives on residential streets threaten *Main Street* retailers, already struggling with vacancies, high rents and BIA fees.

COTRA's survey received many written comments about this dichotomy.

In our view, this proposal jeopardizes both local business and housing stock.

2. Misleading Retail Maps

COTRA disputes Planning's claim regarding the extent of retail and services shortfalls when its own data distorts the existing retail and service coverage.

Planning's Retail and Services map excludes large portions of existing retail activity, including:

- Areas under former City of Toronto bylaws.
- Legal non-conforming businesses.
- Employment areas such as Geary Avenue.
- Some existing plazas in Commercial Local (CL) zones are misclassified as residential.

This also puts into question the rationale for city-wide rezoning to address perceived gaps in retail.

3. Official Plan Contradictions

The Official Plan permits new small-scale retail, services and office uses “**only where they have *minimal adverse impacts*** of adjacent or nearby residents such as those from noise, parking, delivery, and loading ... and to reduce local automobile trips.” (Section 4.1.3).

In our view, bars, patios, food establishments and many late-night activities clearly exceed a “minimal adverse impacts” threshold. Nor would we expect to see a further reduction in local car trips in Neighbourhoods in downtown areas where abundant retail and services already are in easy walking distance of transit. Meanwhile in the suburbs like Scarborough there is no access to higher order transit which makes personal vehicles essential for daily life.

4. City Can't Prevent Alcohol, Cannabis, and Vape Shops

- Convenience stores already are permitted to sell beer and wine in Ontario.
- Liquor licenses are issued by the province through the Alcohol Gaming Commission of Ontario (AGCO), not the City.
- AGCO prohibits municipalities from restricting cannabis shops through licensing or location rules, other than the 150 m setback from schools.

This proposal permits the sale of vaping products, tobacco and alcohol next to homes, schools, or parks.

5. Small-Scale

The Report proposes small-scale retail will benefit neighbourhoods. We disagree.

On Major Streets, commercial spaces of up to 1,600 ft² would be permitted—more than twice the size of an average Dundas Street West storefront (710 ft²) [1]. A space that size could accommodate a licensed restaurant or bar with 30–40 seats, generating noise, traffic, and late-night activity.

These are precisely the adverse impacts the Official Plan seeks to minimize, permitting small-scale retail and services only where such impacts on nearby residents are minimal (Section 4.1.3).

6. Patios and Noise Impacts

The *2009 Ossington Restaurant Study* [2] examined patios and concluded that a 10 metre-setbacks and fencing do not prevent noise, privacy loss, and nuisances.

Today, the Report proposes a one-meter setback. In our view, patios and noise, especially in inner neighbourhoods, will invariably generate negative impacts—contrary to the Official Plan to minimize adverse impacts.

7. Enforcement

Councillors have expressed their concerns that city bylaw enforcement capacity is already strained. And Toronto's Policy Chief, Myron Demkiw, in his letter suggests that “*significant change to our communities always benefits from meaningful consultation between the City, community stakeholders, law enforcement and other city partners*”. COTRA agrees.

In today's market, many retail stores also handle deliveries—that's how a lot of businesses operate. As long as they're technically open to the public, they can still function as delivery hubs. So it's unclear how the warehouse provision would actually prevent the adverse impacts associated with distribution activity in residential areas.

In this regard, the proposal needs considerable work to be shore up the discrepancies before it should move ahead.

8. Committee of Adjustment (CoA) Is Not a Barrier

Planning data shows a 90% approval rate (2018–2023) for non-residential uses (retail, eating establishments, offices, etc.) in Neighbourhoods [1]. In fact, the CoA process works by

enabling case-by-case review and local conditions such as soundproofing to address potential negative impacts.

In addition, new provincial reforms removing resident appeal rights has further streamlined the proceedings to render decisions quickly. In our view, the CoA process is not a barrier as Planning claims so it should continue as a Planning tool.

Conclusion

The NRS proposal envisions small-scale, convenient, innocuous neighbourhood retail. The proposal, however, is wide-sweeping, misleading, and risks perpetual adverse impacts on housing, safety, and residential character. Importantly, it contradicts the intention of the Official Plan while claiming to be guided by it.

Based on the significant flaws in the Report outlined here, COTRA respectfully asks Council to:

- Remove Neighbourhood Interiors from consideration and from future consideration.
- Adopt a targeted approach for rezoning some Major Streets based on demonstrated need and developed in consultation with residents, Residents' Associations, and local ward councillors.
- Prioritize the development and support of existing commercial areas.

Sincerely,

Anne Legris Anderson

On Behalf of the Coalition of Toronto Residents' Associations (COTRA)

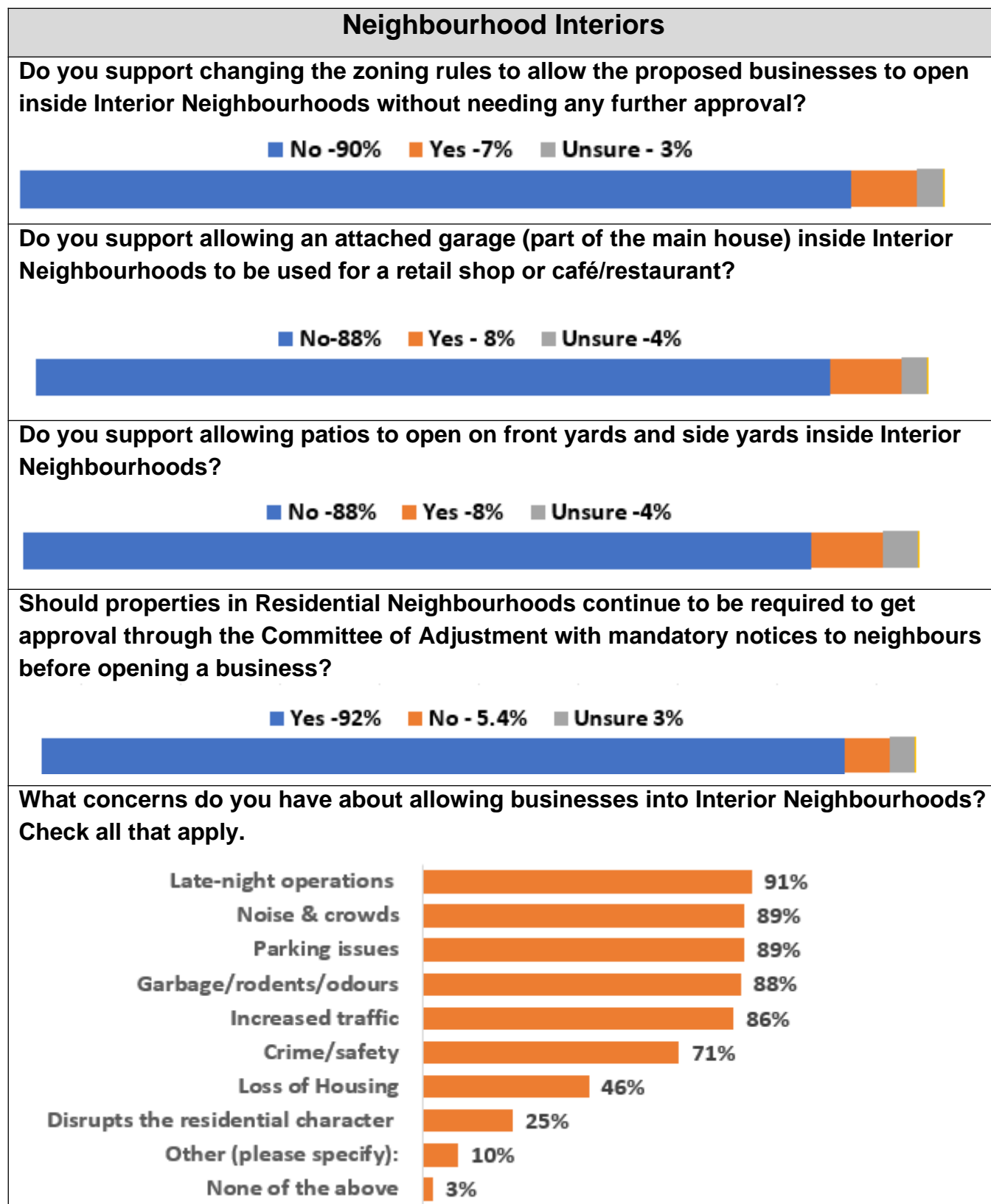
<https://cot-ra.org/>

Sources

[1] [City of Toronto. Neighbourhood Retail & Services. Information and Reports May 2024 Proposals Report Materials: [Attachment 4: Research and Consultation](#)

[2] Staff Report - Ossington Avenue – Restaurant Study – Final Report:
<https://www.toronto.ca/legdocs/mmis/2009/te/bgrd/backgroundfile-25069.pdf>

Appendix 1: COTRA Survey Results



Major Streets

Do you support changing the zoning rules to allow the businesses listed on the previous page to operate from all residential properties on all Major Streets citywide?

■ No -77% ■ Yes -14% ■ Unsure - 3%



Do you support allowing an attached garage (part of the main house) on a Major Street to be used for any of the proposed businesses?

■ No-82% ■ Yes - 11% ■ Unsure -4%



Do you support allowing patios on front yards and side yards on Major Streets?

■ No -80% ■ Yes -13% ■ Unsure -7%



Should businesses be allowed on Major Streets without adding new parking or loading zones?

■ No -86% ■ Yes - 6% ■ Unsure 8%



Should properties on Major residential streets continue to be required to get approval through the Committee of Adjustment with mandatory notices to neighbours before opening up a business?

■ Yes -90% ■ No - 7% ■ Unsure 3%



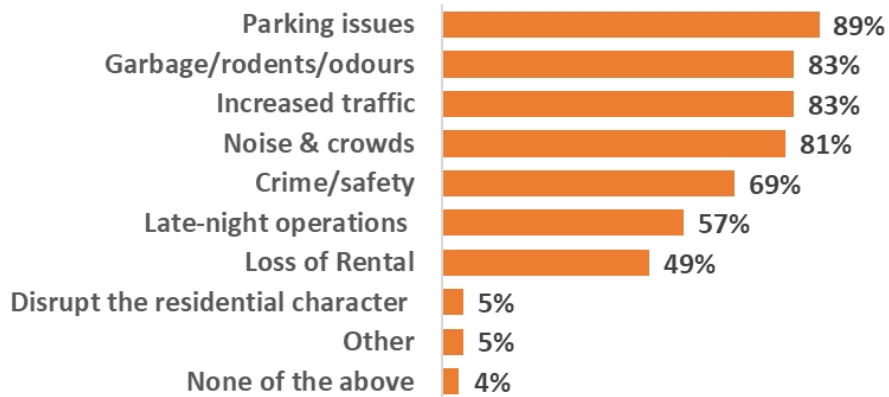
Should City Planning --- in consultation with local residents create a new Zoning category to allow businesses only on specific Major Streets if there is need for such services?

■ Yes -57% ■ Unsure -27% ■ No-16%



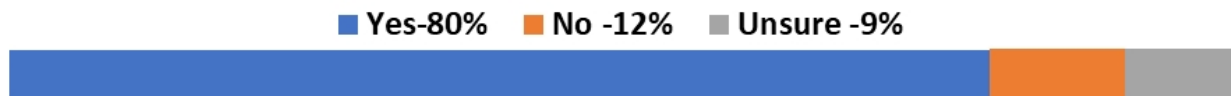
Major Streets

What concerns do you have about allowing businesses to open in every property on Major Streets. Check all that apply:

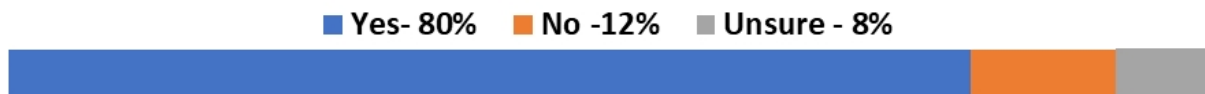


Commercial Areas

Should the City adopt policies to improve occupancy and support businesses on existing commercial streets?



Should City Planning stop proposing changes to allow commercial businesses to open in areas zoned Residential?



Awareness

Have you seen City Planning's online survey regarding the Neighbourhood Retail and Services proposal?

■ No-74% ■ Yes -19% ■ Unsure -6%



In the last few months, have you received any emails or written material from City Planning regarding Neighbourhood Retail and Services proposal?

■ No-85% ■ Yes -9% ■ Unsure -6%



In the last few months, have you seen anything on social media or in traditional media sponsored by City Planning regarding Neighbourhood Retail and Services proposal?

■ No -86% ■ Yes - 7% ■ Unsure -7% ■



In the last few months have you seen or attended a community 'Pop Up' event with City Planning regarding these proposed changes?

■ No-94% ■ Yes -4% ■ Unsure -2%



Appendix 1: COTRA Survey Results: Representative Comments from Residents

The 3,700+ open-ended comments were organized into thematic buckets. Comments offer qualitative insight into the widespread opposition to the city's plan.

"I live on a Major Street. I bought it knowing that it was a residential neighbourhood . . . I would not want a cannabis store next door, nor a cafe or retail establishment." – City Resident

Category	Direct Quote from Survey Respondent
Quality of Life Impact	<ul style="list-style-type: none">• "Residential neighbourhoods should be just that - places where people live - not places where businesses operate. This is a betrayal of the trust that we have put into our city councillors."• "I made the biggest investment of my life in buying my home seeking refuge in the peace and quiet of my residential neighbourhood."
Flawed Planning & Site Suitability	<ul style="list-style-type: none">• "A targeted approach ensures that commercial uses are introduced only where appropriate, supported by infrastructure and community input."
Opposition to Specific Uses	<ul style="list-style-type: none">• "I would not support cannabis or vape shops being allowed to open in residential neighbourhoods."• "I would not want a bar next door that operates until 2 am with all the associated noise and nuisance."
Enforcement & Regulation	<ul style="list-style-type: none">• "Poor enforcement. City Planning wants to allow bars, cafés, and restaurants with patios in residential areas. They say enforcement will handle problem businesses. But here's the truth: No new budget for enforcement. Officers are already short-staffed. Noise complaints at night? Nobody comes. Why is the City selling a plan it knows it can't enforce?"
Communication & Awareness	<ul style="list-style-type: none">• "This entire re-zoning has been kept hidden from residents of the city. Such a large change should have had far more public exposure, publicity, information given to residents, etc. What is the city trying to hide? When I found out in July that there had already been two years of work done, I choked on my coffee. I like to think I keep myself reasonably informed regarding city and ward changes but this one blind-sided me."

SPONSORED SECTIONS

A new vision for Toronto's neighbourhoods — welcoming back small shops and services

City Council will consider zoning changes that would allow small businesses to open closer to where people live, making neighbourhoods more vibrant, walkable and connected.

Updated Sept. 24, 2025 at 9:18 a.m. | Sept. 24, 2025 [🔖](#) [🔗](#)



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For generations, neighbourhoods across Toronto were dotted with small shops — the corner store where you grabbed milk, the café where you chatted with neighbours, or the local tailor in that small plaza who knew your family by name. While some community gems are still thriving today, unfortunately, over time, zoning rules have made it harder for new businesses to open.

That could soon change.

“City Council will be considering zoning bylaw amendments that would make it easier to open small-scale retail, service and office uses in and around residential neighbourhoods,” said Jason Thorne, the City’s Chief Planner. “The proposed changes would allow a broader range of commercial uses along some of our major streets and introduce permissions for small-scale shops on certain interior neighbourhood streets.”



Contributed

He says the goal is to strengthen neighbourhoods by improving access to local amenities, reduce vehicle dependency and support entrepreneurs. If approved, the zoning updates would allow small businesses — like cafés, convenience stores, medical offices and community services — on properties along major streets in residential neighbourhoods. Some small-scale commercial uses would also be permitted on corner lots, next to schools and parks or existing commercial sites inside neighbourhoods.

Even permissions for home-based businesses would be expanded, allowing them to use garages or laneway suites as an office, employ a limited number of staff and have the ability to welcome customers.

There would also be clear regulations set on issues like garbage storage and noise to limit potential impacts on neighbouring properties.



Contributed

Thorne says the proposed zoning changes are designed to bring back the kinds of small-scale shops and services that were historically a key part of neighbourhoods, but that have been regulated out over the last few decades.

“As a kid, I can remember walking to my local variety store for a treat, or to buy my hockey cards. I didn’t need my parents to drive me to the shopping mall. And I didn’t need to walk along or cross a busy road,” he explained. “That is something that every kid should be able to do. But in many cases, it’s getting harder because many of our neighbourhoods don’t allow local shops or services, even on major streets.”

The zoning review also connects to broader changes already underway in Toronto’s neighbourhoods. In recent years, City Council has supported new “gentle density” housing options — from laneway and garden suites to multiplexes and mid-rise apartments — along major streets. These policies are gradually adding more people to established areas, increasing demand for local shops and services.



Contributed

That demand is shaped not only by population growth, but also by lifestyle. With more people working from home, the ability to walk to a café or convenience store makes everyday routines easier. Seniors and families with young children would also benefit from having access to essentials close by.

Examples of this kind of local commerce already exist across Toronto, from family-run cafés in Riverdale to long-standing mini-marts in Etobicoke. Thorne says the proposed changes would expand the ability to establish similar businesses in more neighbourhoods, supporting both convenience for residents and the distinct character of local communities.

“The proposed uses can contribute to the cultural and economic vitality and vibrancy of neighbourhoods by providing easier access to the goods and services that residents need, providing places and spaces where neighbours can meet and connect, supporting residents with limited mobility and families with small children, and providing employment opportunities for nearby residents,” he explained.

Residents can share their views through the City of Toronto’s [online survey](#) before Sept. 30. Feedback will help shape the recommendations before they go to City Council.

To learn more, visit [Toronto.ca/LocalRetail](https://toronto.ca/LocalRetail).

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