October 29, 2025
Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto ON M5H 2N2To:

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 Perks and Members of the Committee,

The Beaconsfield Village Residents Association (BVRA) represents residents in the area bounded by Queen Street West, Ossington Avenue, Dundas Street West, and Dovercourt Road.

We share the City's goal of creating connected, walkable neighbourhoods, but Beaconsfield Village already exemplifies this. Within a five-minute walk, residents have access to grocery stores, pharmacies, cafés, restaurants, schools, parks, and frequent transit. Introducing commercial uses into residential interiors here is unnecessary and risks eroding the quiet, residential character that makes our community livable.

Our recommendations are consistent with those of the Coalition of Toronto Residents Associations (COTRA), which reflect survey input from over 3,400 residents and more than 3,700 public comments gathered across the city.

Executive Summary

BVRA supports strengthening main streets and updating rules for home-based work. However, we oppose the rezoning of residential interiors to allow retail and service uses. The current proposal lacks safeguards, misrepresents the scale of change, and does not reflect feedback from residents' associations across the city — including the Coalition of Toronto Residents Associations (COTRA), of which BVRA is a member.

Our position rests on four key principles:

- 1. Remove Neighbourhood Interiors from the NRS proposal.
- 2. Prioritize development and support of existing commercial areas.
- 3. Maintain the Committee of Adjustment (CoA) process for any change of residential use.
- 4. Adopt a targeted approach to rezone select Major Streets, based on need and proper consultation.

1. Remove Neighbourhood Interiors from the NRS Proposal

The Planning report suggests a 75% reduction in scope by limiting permissions to "community streets," but this reduction applies only to corner properties. Businesses are still permitted next to schools, parks and commercial properties.

Neighbourhood interiors were never intended for commercial activity. Narrow streets, limited parking, and mixed housing forms make them unsuitable for businesses that attract deliveries, noise, and increased foot and vehicle traffic.

The proposal also continues to allow eating establishments, which means bars would be permitted by right. Cannabis shops, as retail uses, would also be allowed. Despite the 150-metre restrictions, there are still many locations along the newly defined "community streets" where these businesses could operate. As long as food is prepared off-site, it can be served and reheated on the premises — which could allow a wide range of commercial activities to open in residential areas. We have already seen how popular spots just down our street have created similar disturbances, including increased traffic, delivery congestion, and late-night noise.es would compromise livability and undermine residential stability.

Equally serious is the risk of tenant eviction and housing loss. Under Ontario's Residential Tenancies Act, tenants can be legally evicted if a property owner converts a rental unit to non-residential use such as a store or office. With thousands of dwellings eligible for conversion under this proposal, the cumulative housing impact could be significant — directly contradicting the intent of the Expanding Housing Options in Neighbourhoods (EHON) initiative.

Yet the Planning report contains no analysis of housing loss or tenant displacement. Treating the removal of rental units for commercial purposes as part of "expanding housing options" is inconsistent with the City's stated housing goals.

We recommend:

- Removing interior residential streets including corner lots within interior blocks
 from the NRS zoning proposal.
- Focusing future studies on identifying genuine "retail deserts," supported by data and consultation with affected communities.

2. Prioritize Development and Support of Existing Commercial Areas

Beaconsfield Village is already surrounded by thriving commercial corridors: Queen West, Dundas West, and Ossington Avenue all provide a complete mix of shops and services within walking distance. The City's focus should be on strengthening these corridors, not dispersing limited retail demand into residential interiors.

With storefront vacancies rising, the priority must be revitalizing existing main streets, ensuring they remain affordable and accessible for small businesses. Expanding

permissions onto side streets would fragment commercial areas and weaken Business Improvement Areas (BIAs) that rely on concentrated, street-facing retail activity.

We recommend:

- Directing investment and incentives to designated main streets.
- Pairing any expansion of retail uses with a clear strategy for filling existing vacancies.

3. Maintain the Committee of Adjustment (CoA) Process for Use Changes

The CoA process is an essential safeguard that allows for case-by-case review and public input when a property owner seeks to change land use. Eliminating this process would remove transparency and community voice, replacing thoughtful evaluation with automatic permissions.

In its own report, Planning notes there were many applications to change residential properties to commercial uses in neighbourhoods between Jan 2018 and Nov 2023.

90% of these applications were granted by the CoA. A 90% approval rate is clearly not a barrier to development. In other words, if a property owner wants to convert a neighbourhood residential property to a small scale business they can already do so.

In fact, the Ford government has more recently streamlined the CoA process dramatically. The right of neighbours to appeal a CoA decision has been taken away. CoA decisions are final and neighbours cannot hold the process up.

It's not a perfect process, but it does allow input from the community and gives owners a chance to address any concerns. More importantly, the CoA can impose some local conditions on a case-by-case basis. For example, the Committee could require a music school be to install sound-proofing to protect next door neighbours.

This approach allows for tailor-made, community-centred solutions that provides a path for small scale businesses, balanced by neighbourhood input and oversight. Removing that step risks unintended consequences and erodes residents' trust in the planning process.

We recommend:

- Retaining the CoA process for any conversion of residential space to commercial use.
- Ensuring residents are notified and consulted before any such changes occur.

4. Adopt a Targeted, Consultative Approach to Rezoning Major Streets

If additional permissions are needed, they should be limited to select major streets where there is clear evidence of unmet need and infrastructure capacity to support it. These areas should be identified through data, consultation, and transparent criteria — not applied citywide.

We recommend:

- Adopting a limited, data-driven approach focused on underserved areas.
- Ensuring resident associations, Councillors, and communities are meaningfully consulted before any rezoning.

Conclusion

Beaconsfield Village already meets the City's goals for walkability and access to local services. There is no demonstrated need to introduce retail or service uses into residential interiors.

We urge the Committee to amend the NRS proposal to:

- Remove residential interiors from the zoning changes;
- · Focus revitalization on existing main streets;
- · Maintain the CoA process; and
- Adopt a targeted, evidence-based approach to any future zoning adjustments.

Sincerely,

Randy Kerr

Chair, Beaconsfield Village Residents Association (BVRA) Member, Coalition of Toronto Residents Associations (COTRA)