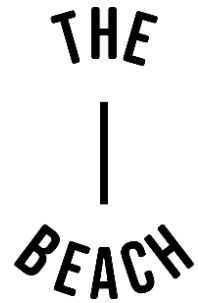


**The Beach BIA**  
1971 Queen St E #203  
Toronto, ON  
M4L 1H9



**March 6, 2026**

**Dear Toronto City Council**  
**c/o Economic and Community Development Committee**  
**City of Toronto**

**Re: Item EC27.2 – Review of Toronto’s Street Vending and Artists By-laws**

Dear Members of Council,

On behalf of The Beach BIA Board of Management, thank you for the opportunity to comment on Item EC27.2.

The Beach BIA supports the City’s objectives to enhance vibrancy and expand opportunities for entrepreneurship. Street vending and artist activity can contribute positively to the public realm when appropriately scaled and integrated.

As a local board under Chapter 19 of the Toronto Municipal Code, we are equally responsible for supporting local businesses and stewarding the public realm. It is from this perspective that we offer the following considerations.

**Context: The Beach BIA**

The Beach BIA operates within a high-activity, park-integrated main street environment. Our commercial corridor directly interfaces with Kew Gardens, Ivan Forrest Gardens, and Woodbine Park, and already experiences significant seasonal vending activity.

The BIA has also made sustained capital investments in park frontages to strengthen connectivity between these public spaces and Queen Street East businesses.

In this context, the issue is not access to vending, but the cumulative impact of additional intensity in an already active environment.

## **Key Considerations**

### **1. Increased Concentration**

Lower fees and expanded permit types will increase vendor participation. In The Beach, this will concentrate in park-adjacent, high-traffic areas, directly impacting storefront businesses and pedestrian flow.

### **2. Extended Operating Hours**

Expanding vending from 5 to 12 hours per location effectively enables full-day operation, shifting vending from complementary to direct competition with local businesses.

### **3. Reduced Flexibility in Public Space**

Removing expiry provisions for curb lane permits introduces greater permanence in areas where curb space is already constrained and serves multiple needs.

### **4. Limited Local Coordination**

Streamlined permitting reduces coordination points. Without formal BIA engagement, increased vending activity may outpace local planning and create operational conflicts.

### **5. Reactive Monitoring**

A post-implementation monitoring approach places the burden on neighbourhoods already operating at capacity during peak seasons.

## **Recommendations**

To support balanced implementation, we respectfully recommend:

- Incorporating area-specific considerations for park-adjacent, high-activity BIAs
- Establishing formal BIA notification and engagement protocols
- Reconsidering the uniform 12-hour operating window
- Maintaining flexibility in curb lane management
- Including neighbourhood-level monitoring with early review triggers

## **Closing**

The Beach BIA values its collaboration with the City of Toronto and supports thoughtful modernization of City policies.

However, in neighbourhoods like ours, where the City and BIA have jointly invested in public realm improvements, a uniform expansion of vending without local calibration risks undermining both business viability and the intended function of these spaces.

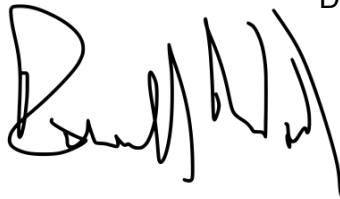
We encourage a more context-sensitive approach and would welcome continued engagement.

Respectfully submitted,

Russel Ward  
Board Chair  
The Beach BIA Board of Management

Russell Ward  
Signature

April 7 2026  
Date

A handwritten signature in black ink, appearing to read "Russell Ward", positioned between the signature and date lines.