

May 6, 2024

Item - 2024.TE13.9

1930-1938 Bloor Street West and 3, 5 and 21 Quebec Avenue - Zoning By-law Amendment and Rental Housing Demolition Applications

I am writing in support of the recommendation of the Director, Community Planning Toronto and East York District, that the above application be refused.

My objections concern the protection of natural heritage.

The subject lands, on the north side of Bloor Street West immediately east of Quebec Avenue, are adjacent to the provincially significant High Park Oak Woodlands Area of Natural and Scientific Interest-Life Science (ANSI). Both the City's Official Plan, in OP 3.4.15, and the Provincial Policy Statement 2020, in Section 2.1, prohibit development on lands adjacent to ANSIs unless it can be shown there is no negative impact on the feature or functions. As a reminder, decisions in respect of a planning matter must be consistent with the Provincial Policy Statement in effect.

The PPS defines negative impact as degradation that threatens the integrity of the feature and its functions resulting from single, multiple or successive developments. This clause requires consideration of cumulative effects, anticipating the argument that no single proposal is sufficiently large to threaten the ANSI on its own. The Province's guideline, the Natural Heritage Reference Manual, observes that negative impact can be direct or indirect.

It is the intention of the City to permit intensification on Bloor Street West north of High Park. This application proposes a 17-storey tower which will shade the park, according to the proponent's own sun/shadow study. One of the many reasons for the High Park burn is keep at bay trees which would shade the tallgrass plant communities (prairie, savannah and woodland) which comprise some of the ANSI. All three are critically imperilled in Ontario (the last step before extirpation). Proposals that would shade them with buildings instead should be refused. (City staff has noted in the Decision Report that shadow effects are undesirable.)

Grenadier Pond, included in the ANSI designation, gets half its water from groundwater. The application proposes to reduce the pervious surface and to implement permanent dewatering. Both deprive Grenadier Pond of groundwater. By-Law 1230-2018 implementing the recommendations of the High Park Apartment Neighbourhood Character Area include measures to protect the hydrological regimes and their connections to the natural heritage in High Park and these provisions should apply to Bloor Street properties in order for the City to be able to accept that there is no negative impact.

The Bloor West Village Avenue Study Natural Heritage Impact Study (March 2018) articulated a common complaint—that dogs running off-leash is leading to habitat degradation in the High Park ANSI. The Study recommended that development along the Bloor West Village corridor should incorporate dog courtesy areas. The proposal does not provide any facilities for dogs on the grounds that the dogs can use High Park.

(In December 2019 the City produced Pet Friendly Guidelines and Best Practices for all new multi-unit residential buildings that are required to provide amenity space, in part to protect the natural environment from the cumulative negative impacts of large numbers of dogs. In the Decision Report City staff recommend that a future approval for this site incorporate pet friendly guidelines.)

In sum, the applicant has not shown there is no negative impact on the natural heritage in High Park. On these grounds the High Park Natural Environment Committee supports the staff recommendation that the proposal be refused.

Leslie Gooding,
Co-Chair, High Park Natural Environment Committee

The High Park Natural Environment Committee is a volunteer group that provides information about the natural environment in High Park and advocates for its protection.