

**2025.TE27.29 - Bloor West Village Avenue Study - Urban Design Guidelines - Final Report, Addendum, Lenka Holubec, ProtectNatureTO**

Dec 15, 2025

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**RE: 2025.TE27.29 Bloor West Village Avenue Study - Urban Design Guidelines, City Council Dec 16,17, 18 2025**

Dear Mayor and Members of City Council,

Thank you for this opportunity to comment on 2025.TE27.29 Bloor West Village Avenue Study - Urban Design Guidelines - Final Report, City Council Dec 16, 17, 18 consideration.

This Addendum is a follow up to communication submitted to Toronto and East York Community Council, November 27, 2025 [Letter from Lenka Holubec \(TE.Supp\)](#).

This Final Report should not be adopted, unless terms of [Attachment 7 - Urban Design Guidelines](#), specifically dealing with the High Park's Frontage, are in consistency and conformity with city adopted protection policies (Chapter 3.3.4.14, 15), and PPS 2024 to ensure continued protection of significant natural heritage (the Environmentally Significant Areas, the ESAs and the Areas of Natural and Scientific Interest (the ANSI)s in High Park: [MAP of the Bloor West Avenue Study Area](#) [BWVA NH Impact Approach](#) [200m High Park catchment](#)

***"The recommendations address the objective of protecting regional biodiversity in the TRCA jurisdiction. In order to at least maintain, and preferably enhance, the current level of biodiversity at High Park, the overall integrity of the natural heritage system that includes this provincially-significant area must be protected."*** [High Park – Terrestrial Biological Inventory](#)

Upholding protection and environmental policies in respect to Toronto's [The ESAs](#), as adopted into the OP in 2015, is critical. [OPA 262](#) was approved by the Province in May 2016. The OPA is in full force and effect. Biodiversity and climate crisis are intertwined and cannot be separated.

Toronto's ESAs are only 4% of city land. These sensitive habitats "have low wear tolerance" and cannot be replaced. [Parks Plan 2013-2017](#).

Refer [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#) and [Urban Design Guidelines, October 2025, Draft October 2025](#) for the city staff to do more work along further recommended changes.

Remove High Park and Keele subway stations from [Key MAP of MTSAs and PMTSAs](#) and Implement [CHAPTER EIGHT: MAJOR TRANSIT STATION AREAS AND PROTECTED MAJOR TRANSIT STATION AREAS, AUGUST 2025 OFFICE CONSOLIDATION](#)

***"4) Policies relating to matters of health, safety, accessibility, sustainable design, protection of the natural environment, watershed and water resource systems, and the protection of adjoining lands are prioritized over any other development criteria policies."***

Much anticipated BWVA Study [EY31.5 - Status Report - Bloor West Village Avenue Study](#), initiated in late 2016, felt short on delivery.

Several years of a gap (2019 – 2024), while “*shifts in planning policy*” have been taking place along all levels of governments, opened the Study Area [MAP of the Bloor West Avenue Study Area](#) to more development pressures and changed the city priorities towards more growth and inclusionary zoning near transit [Major Transit Station Areas \(MTSAs\) and Protected Major Transit Station Areas \(PMTSAs\) in-Effect](#) additionally to other changes along HAP, HAPA. EHON.

This shift clearly manifests in BWVA Study via permitted height along the High Park frontage:

- **8 storey** as per [Bloor West Village Avenue Study-Status Report, 2018](#) “*Removing the density numbers from the zoning permissions as building envelopes should be controlled by height, setback and angular plane regulations*”
- **13 storey** as per [Sept 2025 BWVA Study Urban Design Guidelines](#) This Draft was presented online on Sept 20, 2025 to LAC participants.
- **20 storey** per Oct 2025 : [Attachment 7 - Urban Design Guidelines](#) It is worth noting that 7 storey up was added by city staff within a couple of weeks in October with no prior consultation.

The environmentally sensitive areas, protected as the ESA, ANSI, located across of Bloor West St. and along the High Park Frontage are within protected natural heritage adjacency (120m) - [BWVA\\_NH Impact Approach\\_200m High Park catchment](#) and are the subject to city adopted high level protection laws. It has already been established that development is considered “adjacent” even if there is a road between the park border and the property in question.

[Attachment 7 - Urban Design Guidelines](#) proposes much more density/height in relation to [Major Transit Station Areas \(MTSAs\) and Protected Major Transit Station Areas \(PMTSAs\) in-Effect](#), and potentially much more negative effects resulting from direct but more concerning indirect/induced/cumulative impacts from hundreds more users, dogs, light, noise, etc.

*“The potential for indirect impacts due to intensification along the Bloor Street West Avenue Study area has been a major concern of stakeholders throughout the Bloor West Village Avenue Study consultation process.*”

*Indirect impacts are less predictable and harder to mitigate than direct impacts, as they can occur outside of the direct development footprint.”* [BWVA Study NHIS Dougans highlights](#) 6.4.2 POTENTIAL INDIRECT IMPACTS, 2018

[Attachment 7 - Urban Design Guidelines](#) October 2025 seems to be downplaying potential impacts:

*“Preliminary assessment indicates that buildings generally around 20 storeys may be appropriate for this location as they can provide a suitable transition from the surrounding Apartment Neighbourhoods, meet the minimum density requirements within the PMTSA and have a limited impact on the ESA.*”

This statement by itself indicates the city is not clear about interpretation of the adopted protection policies (Chapter 3.3.4.13,14, 15), PPS 2024.

All development proposals adjacent (within 120m) from High Park’s ESA, ANSI “*must demonstrate there will be no negative impacts on the natural features and their ecological functions for which an area is identified due to single, multiple or successive development or site alteration activities.*” [PPS 2024](#)

The City cannot unilaterally append the policies that were adopted to bring the OP to conformity with Provincial Policy Statement 2014 - [OPA 262](#) was approved by the Province in May 2016. The OPA is in full force and effect.

We simply should not expect High Park to continue thriving as “Jewel of Parks” [High Park Restoring a Jewel of Toronto’s Park System](#) for “the long term”, unless protection is prioritized over other ***over any other development criteria policies***, as it is actually mandated along protection policies adopted into city OP (*Chapter 3.3.4.13,14, 15*) and PPS 2024.

Recently adopted into the OP Chapter 8 provides for modification to densities requirement:

***“The Modifications provide that policies within Chapter 8 relating to “protection of natural environments, watershed and water resource systems” are to be prioritized over “other development criteria policies”.*** [Continued Protection of Environmental Areas and Floodplains](#) legal interpretation of Chapter 8.

**CHAPTER EIGHT: MAJOR TRANSIT STATION AREAS AND PROTECTED MAJOR TRANSIT STATION AREAS, AUGUST 2025 OFFICE CONSOLIDATION**

***"4) Policies relating to matters of health, safety, accessibility, sustainable design, protection of the natural environment, watershed and water resource systems, and the protection of adjoining lands are prioritized over any other development criteria policies."***

MTSA/PMTSA is a part of the city's effort to implement new provincial requirements for growth around transit, approved by the Minister of Municipal Affairs and Housing in August 2025, aiming for higher density and more affordable housing (Inclusionary Zoning).

Where MTSA/PMTSA is in conflicts with standard development criteria, the policies for health, safety, accessibility, sustainability, and environmental protection (watersheds, natural features) are to be prioritized. *Priority Policies* include the policies for health, safety, accessibility, sustainability, and environmental protection (watersheds, natural features).

Encompassing High Park and Keele subway stations into recently approved [Key MAP of MTSAs and PMTSAs](#), in spite of their adjacency (within 120m) to High Park's ESA, ANSI, is not in consistency with the protection mandated in respect to the ESA, ANSIs in the OP and [PPS 2024](#): ***"4.1 Natural features and areas shall be protected for the long term."***

It creates conflict between the city growth and inclusionary zoning plans and its legal obligation to protect High Park's adjacent the ESA/ANSI for the long term.

The Conflict: The newly approved MTSA/PMTSA boundaries (within 120m) to High Park's ESA/ANSI, seems to contradict the OP/PPS mandate for long-term protection of these natural areas, indicating growth is prioritized over strict environmental boundaries in this spot.

**In respect of High Park's frontage, protection policies must be prioritized as the entire area of PMTS/MTSA High Park is located within the adjacency (minimum distance 120m) to the ESA/ANSI. The same applies to Keele Station.**

The consequences of allowing density to rise along High Park Frontage to 20 storey buildings would be devastating as already now *"the user pressures on this already heavily visited park are too high"* [High Park – Terrestrial Biological Inventory excerpts](#)

Refer [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#) and [Urban Design Guidelines, October 2025, Draft October 2025](#) for the city staff to do work along recommended changes.

Recommended changes:

**1. Remove High Park and Keele subway stations from [Key MAP of MTSAs and PMTSAs](#)**

**or at least Implement [CHAPTER EIGHT: MAJOR TRANSIT STATION AREAS AND PROTECTED MAJOR TRANSIT STATION AREAS, AUGUST 2025 OFFICE CONSOLIDATION](#)**

***"4) Policies relating to matters of health, safety, accessibility, sustainable design, protection of the natural environment, watershed and water resource systems, and the protection of adjoining lands are prioritized over any other development criteria policies."***

**2. Re-consider permitted height along the High Park frontage back to the original 8 storey since connected level density was considered along all studies and reports done for BWVA Study.**

*"Removing the density numbers from the zoning permissions as building envelopes should be controlled by height, setback and angular plane regulations"*

**8 storey** as per [Bloor West Village Avenue Study-Status Report, 2018](#) .

**13 storey** as permitted height along High Park Frontage [Sept 2025 BWVA Study Urban Design Guidelines](#) - this Draft was presented online on Sept 20 to LAC participants

**20 storey** in recent version: [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#) 2025

3. Incorporate into [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#) direction stating, “*where conflict exists, policies that provide more protection to the natural environment prevail.*” along Chapter 8 of the OP.

4. Incorporate the City Council direction from [EY31.5 - Status Report - Bloor West Village Avenue Study](#) into [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#)

“1. City Council direct Parks, Forestry and Recreation staff to review the current High Park Woodland and Savannah Management Plan to identify the scope of work and associated timing of an update to that Plan.”

5. Required change: substitute 3.4. 13 with 3.4.14 and 3.4.15 in [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#) reference to

“Natural Heritage system” pg.10:

3.4.14 “An impact study, as referred to in policy 12, will be required for any proposed development adjacent to these areas. Any proposed development will avoid these areas, minimize negative impacts and, when possible, restore and enhance the ecological functions attributed to these areas.”

6. Adopt and Incorporate improved mitigation measure included in Appendix 5 [APPENDIX 5 Natural Heritage Impact Study, BWVA Study March 2018](#), [Dougans & Associates Natural Heritage Impact Study, Bloor West Village Avenue Study, May 2018](#) into [Urban Design Guidelines, October 2025, Draft October 2025](#)

7. Incorporate findings and conclusions of [High Park – Terrestrial Biological Inventory excerpts public use](#) into [Urban Design Guidelines, October 2025, Draft October 2025](#)

8. Incorporate the City Council direction from [EY31.5 - Status Report - Bloor West Village Avenue Study](#) into [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#)

“1. City Council direct Parks, Forestry and Recreation staff to review the current High Park Woodland and Savannah Management Plan to identify the scope of work and associated timing of an update to that Plan.”

9. Incorporate into [Urban Design Guidelines, October 2025, Draft October 2025](#) Under 1.5 POLICY CONTEXT [PPS 2024](#) “4.1 Natural features and areas shall be protected for the long term.”

In conclusion

“**Protect and Preserve**” significant protected natural heritage of High Park and Humber Park has given a way in recent [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#) to other priorities: more growth and PMTS/MTSAs.

This Final Report seems not to be in conformity with the city adopted protection policies in the OP, Chapter 3. 3.4. Natural Environment and the terms of PPS 2024 to ensure continued protection.

Jennifer Keesmaat: “One of the really important roles for municipal government to play is to ensure that we have clarity as to where growth will go, as well as where growth won’t go. Seventeen per cent of our city is ravines; we’ve just brought forward additional environmentally-sensitive areas. We don’t want growth in those areas”. [“It’s easy to make mistakes when you’re building North America’s fourth-largest city”](#)

Yours sincerely,

Lenka Holubec on behalf of [ProtectNatureTO](#)

## References:

- *“Natural areas are vulnerable to heavy use, as they have low wear tolerance’ and natural ecosystems deteriorate relatively quickly under conditions of overuse. Natural environments have a threshold (or “tipping point”) for disruption beyond which severe and possibly irreversible damage is done to ecological health.” [Parks Plan 2013 -2017](#)*
- In September 2015, the City Council has adopted of a high level of protection in conformity with Provincial Policy Statement 2014 into the Official Plan: [Official Plan Five Year Review: Final Recommendation Report - Amendments to the Official Plan Environmental Policies and Designation of Environmentally Significant Areas](#)
- [OPA 262](#) was approved by the Province in May 2016. The OPA is in full force and effect.
- BWVA Study initiation in late 2016 was hailed as an avenue for achieving protection results by embracing of freshly adopted protection laws. The City Council’s adoption of [EY31.5 - Status Report - Bloor West Village Avenue Study](#) in June 2018 was a step into the right direction to keep density/height at the bay still compatible with protection to minimize direct/indirect/cumulative impacts.
- [BWVA Study NHIS Dougans highlights](#) 6.4.2 POTENTIAL INDIRECT IMPACTS, 2018

“The potential for indirect impacts due to intensification along the Bloor Street West Avenue Study area has been a major concern of stakeholders throughout the Bloor West Village Avenue Study consultation process.

**Indirect impacts are less predictable and harder to mitigate than direct impacts, as they can occur outside of the direct development footprint.**

**Disturbance and predation of wildlife; Habitat fragmentation; Trampling and predation due to increased human and dog user ship; Accidental or intentional spread of invasive species; Changes in downstream water quality and quantity”**

- [High Park – Terrestrial Biological Inventory](#)

#### 5.2 Site Recommendations

**The recommendations address the objective of protecting regional biodiversity in the TRCA jurisdiction. In order to at least maintain, and preferably enhance, the current level of biodiversity at High Park, the overall integrity of the natural heritage system that includes this provincially-significant area must be protected.**

Therefore, at the landscape scale, in keeping with the TNHSS, connections to other natural habitat patches in the landscape need to be enhanced and maintained. Furthermore, the recommendations highlight the issues that occur with increasing public use of the site. Managing public use, strategic placement of interpretive signage, allowing healthy dynamic natural processes to proceed, and controlling invasive species will all aid in addressing the negative matrix influences that are occurring on the park.

- [High Park – Terrestrial Biological Inventory excerpts](#)

“Intensification and infill development of the neighbourhoods around High Park is anticipated. It is a desirable location. This could exacerbate the user pressures on this already heavily visited park, unless there is careful planning.

Uncontrolled recreational activities present a risk to the quality of the habitat in High Park.

High participation rates increase the negative effects on habitats and species.

The main disturbances affecting High Park at present are intensive trampling from park visitors and off-leash dogs in upland habitats, and storm water runoff in the wetlands and riparian areas causing nutrient loading and flash flooding.”

- [Dogs impacts in High Park – Terrestrial Biological Inventory, TRCA, 2019](#)
- [PPS 2024](#)

*“4.1 Natural features and areas shall be protected for the long term.”*

*Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions. pg. 21*

Negative impacts: means pg.48

*c) in regard to other natural heritage features and areas, degradation that threatens the health and integrity of the natural features or ecological functions for which an area is identified due to single, multiple or successive development or site alteration activities."*

- **The city settlement, from January 2025** <https://secure.toronto.ca/council/agenda-item.do?item=2025.CC26.5> with a revised proposal **1930-1938 Bloor Street West and 3, 5 and 21 Quebec Avenue**, should be explained in [Urban Design Guidelines, October 2025, Draft October 2025](#). NHIS for this proposal was lacking any evaluation regarding indirect and cumulative impacts from this proposal. There is no mention in this NHIS of the Grenadier Pond, PSW complex designation and any potential impacts due to required dewatering [Grenadier Pond PSW Wetland Complex Catchment basin TRCA March 2022](#). NHIS "improved" as per the Executive of Development Review agency was not made available to public. It is not clear why the city has settled with this proposal calling for 19 storey.
- [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#)
- [Attachment 7 - Urban Design Guidelines](#) October 2025

*"Preliminary assessment indicates that buildings generally around 20 storeys may be appropriate for this location as they can provide a suitable transition from the surrounding Apartment Neighbourhoods, meet the minimum density requirements within the PMTSA and have a limited impact on the ESA. However, this height requires further evaluation through future development applications to determine the most appropriate height for this section of the street."*

- [It took the Conservatives 1,121 days to approve higher density and affordable housing near TTC stations.](#)

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"After three long years, the Conservatives have finally given Toronto the green light to quickly approve taller condos and apartment buildings near 120 transit stations. Toronto can now also require developers to make up to 5% of all homes in big new developments affordable for middle-income households for up to 25 years.

Based on this provincial chart that tracks how affordable a home has to be for a developer to be exempt from development charges, we expect an affordable condo will be priced at \$374,000, and an affordable two-bedroom apartment will cost \$1985 a month.

This policy - known as inclusionary zoning - is much weaker than what the City of Toronto requested the province approve back in July 2022.

Here are the stations affected by this new development. They include almost all TTC subway stations."

- ["It's easy to make mistakes when you're building North America's fourth-largest city"](#)

"National Observer: You've talked about historical mistakes made in terms of how we deal with nature in the city – water, for example. What do you see coming in terms of re-integrating that, and what do we actually want?" Jennifer Keesmaat: "One of the really important roles for municipal government to play is to ensure that we have clarity as to where growth will go, as well as where growth won't go. Seventeen per cent of our city is ravines; we've just brought forward additional environmentally-sensitive areas. We don't want growth in those areas".