

Swansea Area Ratepayers' Association

Reflecting the interests of the Swansea Community



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Swansea Area Ratepayers' Group

Written and submitted to the Toronto East York Committee of Adjustment on behalf of the Swansea Area Ratepayers Association (SARA) and the Swansea Area Ratepayers Group (SARG) regarding the following matter

SARA/SARG is an incorporated not-for-profit community advocacy association which has an interest in good planning and development on behalf of the Swansea community in the greater Swansea area. It is with this commitment to the community in mind that we provide our concerns regarding this application.

Re: December 10, 2025 meeting of the Toronto Preservation Board,
agenda Item - PB 38.2 the Bloor West Village Heritage Conservation District
Study - Final Report, for the

Written and submitted on behalf of SARA/SARG by:

Nicholas Singh,
Secretary Treasurer, SARA/SARG
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December 08, 2025

Members of the Board,

Thank you for the opportunity to critique the matter before the Board.

The Swansea Area Ratepayers' Association/Group generally supports the Board's intention to endorse the recommendations of the Bloor West Village Heritage Conservation District Study - Final Report dated April 21, 2021 and to endorse the list of properties identified as having cultural heritage potential attached to the Report

However, it has been 12 years since the Bloor West Village Community submitted its Heritage Conservation District (HCD) application and over 20 years in pursuit of an OPA/SASP to properly manage development in the Bloor West Village area, and to date there is still no plan for the completion of this objective.

Given this time frame and the results so far it is good to see that there is still some hope for good planning to find a place in the rush to build faster. And we recognise that more work needs to be done before the heritage that we recognise in Swansea and Bloor West is properly protected and preserved.

While we generally support the recommendations before the Board we wish to make the following comments for the record.

The comments in the fourth and final paragraph of the Summary of agenda Item - PB 38.2 the Bloor West Village Heritage Conservation District Study - Final Report, for the December 10, 2025 meeting of the Toronto Preservation Board optimistically states that "The findings and recommendations from the HCD study have informed and guided the development of the Urban Design Guidelines (the "Guidelines") ensuring that heritage considerations are meaningfully integrated into the planning framework."

The correction is that the Guidelines have been hijacked by the Province's and the City's directives to increase heights and densities across the city. These heights and densities (or lack of limits on heights and densities) do not come from either the HCD Study or the Avenue Study and yet they appear in the Guidelines as if they did. These heights and densities have been used to overwrite the heights recommended by the BWV Avenue Study, recognised as existing context by the HCD Study and were demonstrated to be necessary to protect the heritage features of the area.

For example, where the Avenue Study, Final Report 2018 calls for specified maximum heights of 20 meters to 30 meters based on the existing context of each of the four Character Areas in the Avenue Study (See recommendation R73) the

Guidelines turn to the Province's PMTSA legislation which proposes 20 and 30 storeys and then asks for consideration of the context, the parks and the Guidelines (See Guidelines 5.2.2).

The heights and densities of the PMTSA's give no consideration to "...ensuring that heritage considerations are meaningfully integrated into the planning framework."

What is worse is that findings that are based on good planning practices and on detailed inspection of the Study Area and are meant to ensure that heritage considerations are meaningfully integrated into the planning framework have been set aside.

Turning to the December 1, 2025 Report for Action, Bloor West Village Heritage Conservation District Study -Final Report from Senior Manager, Heritage Planning, Urban Design, City Planning, to the Toronto Preservation Board, (and identified as a November 18, 2025 document on the agenda), at paragraph four under the heading "Bloor West Village Avenue Study" the report makes it seem that the 2025 Urban Design Guidelines arose organically from the previous studies.

The paragraph fails to mention that on October 15, 2024 the City presented what it called a "draft policy framework" supposedly based on the BWV Avenue Study, but updated according to new Provincial and City policies. These new policies were never studied for compatibility with the areas in the BWV Avenue Study. They were just used to overwrite any conflicting recommendations of the 2018 Final Report of the BWV Avenue Study.

It is interesting that paragraph five claims that "proximity to transit" reinforces the area's sense of place and identity. Section 4.5 of the 2018 BWV Avenue Study Final Report, dealing with transportation, makes no such claim. It is possible that this reference to transit was inserted to associate the Avenue Study with the new heights and densities of the PMTSA's and which were superimposed upon the Guidelines.

In conclusion it should be noted that the new heights and densities were never investigated for their compatibility with any of the existing contexts of the Study Area and to date the only official studies to document what would be appropriate development for those areas are the HCD Study, 2021 and the BWV Avenue Study Final Report of 2018 and the Bloor West Village Urban Design Study of 2005.

Nicholas Singh
Secretary-Treasurer
SARA/SARG

Attached for the reader's convenience:

2018 Final Report, Bloor West Village Avenue Study, CHAPTER 7:
RECOMMENDED GUIDELINES AND STANDARDS :

7.10. HEIGHTS

R67

Ensure building street walls to provide a consistent and contiguous street edge.

R68

The minimum height for all buildings within the Village Main Street character area will be 10.0 metres (approximately 3-storeys).

R69

The minimum height for all buildings within the West Village, East Village, and High Park Frontage character areas will be 10.5m (approximately 3-storeys).

R70

The maximum first floor height in the Study Area is 4.5m.

R71

In the Village Main Street character area, the first floor height should relate to adjacent existing buildings, approximately 4.0m. The on-going HCD Study and potential HCD Plan may result in policies and guidelines that refine this recommendation.

R72

Building streetwalls will vary in height between three to six storeys throughout the Study Area to create an interesting and variable composition for the public realm edge.

R73

Midrise buildings are appropriate for the entire Study Area. The maximum height of mid-rise buildings should differ depending on character area. Not all buildings will achieve the maximum height due to other conditions of their sites. The maximum heights should be:

- West Village: 30m (9 storeys) for buildings that front on Bloor Street West. This 1:1 ratio of building height to right-of-way is consistent with the City of Toronto Avenues and Mid Rise Buildings Study.

- Village Main Street: 20m (6 storeys) for buildings that front on the Bloor Street West. This 0.75:1 ratio of building height to right-of-way is similar to the 2016 Mid Rise Addendum of 0.8:1 ratio for Avenue character areas, but further refined through this Avenue Study's option development and testing.
- East Village: 27m (8 storeys) for buildings that front on Bloor Street West. This 1:1 ratio of building height to right-of-way is consistent with the City of Toronto Avenues and Mid Rise Buildings Study.
- High Park Frontage: 27m (8 storeys) for buildings that front on Bloor Street West. This 1:1 ratio of building height to right-of-way is consistent with the City of Toronto Avenues and Mid Rise Buildings Study.

R74

New additions or modifications to existing buildings are encouraged. The typical addition is no more than 50% in height of the original building (Midrise Performance Standard #19F) and up to the maximum streetwall height. In some instances, a larger addition may be appropriate which will be determined through the design approval process. The ongoing HCD Study may also provide further recommendations regarding additions or modifications.

R75

Above the stated maximum height within each character area, no occupiable floor space is permitted.

R76

Mechanical penthouses and other rooftop elements are permitted and should integrate with the overall building design. Only non occupiable space above the stated height limits is permitted and must fit within the established front and rear angular planes. The current Zoning By-law requirements for mechanical penthouses will continue to apply, including a maximum permitted height of 5.0m, all or part of which may be above the stated maximum building height.

The Guidelines have the following height requirements:

5.2.2 Building Height

a. Notwithstanding the approved densities at PMTSAs, development should consider the context, existing parks and the Guidelines, as well as other policies and city-wide guidelines.

b. The following criteria should be met in assessing proposed building height:

Height peaks are anticipated at intersections where transit stations are located.

A total of 5 hours of sunlight is provided on the north sidewalk of Bloor Street West at the equinoxes.

Where additional height is proposed that exceeds the ROW width, larger setbacks and stepbacks should provide contextual fit and integrate with the heritage character.

A defined base building is provided that responds to the context.

Appropriate fit and transition in scale and massing to the existing context and adjacent heritage properties (including the heritage potential properties) is provided.

A shadow study and Natural Heritage Impact Study assess potential impacts, recommend appropriate mitigation and enhancement measures, and demonstrate that new shadows will not negatively impact Environmentally Significant Areas (see 5.6.3 and 5.6.5).

c. At sites adjacent to parks, design buildings to achieve 5 hours of continuous sunlight at the equinoxes. Further analysis is required in the context of a development application to ensure shadows do not impact playgrounds, areas programmed for seating or significant public spaces.

d. Include the mechanical penthouse when determining total building height and assessing shadow impacts, as defined in each Character Area.

e. Indoor amenity space may be located at the mechanical penthouse level to support outdoor amenity space on the rooftop.

Bloor West Village Avenue Study

The City Planning Division has undertaken an Avenue Study for the properties fronting on Bloor Street West between Keele Street and the Humber River. The Avenue Study involves the analysis of existing buildings, zoning by-laws, land uses, parks, open spaces, transportation and servicing infrastructure, community services and other aspects related to the redevelopment of this corridor which is identified in the City's Official Plan to accommodate population growth.

The Avenue Study developed recommendations to implement the policy framework, which includes suggested area-specific planning tools and policies and area-specific urban design guidelines.

The City is holding an Open House to share a draft policy framework to implement the Avenue Study for community members and gather feedback. The draft policy framework is informed by the Avenue Study and updated Provincial and City-wide policy direction.

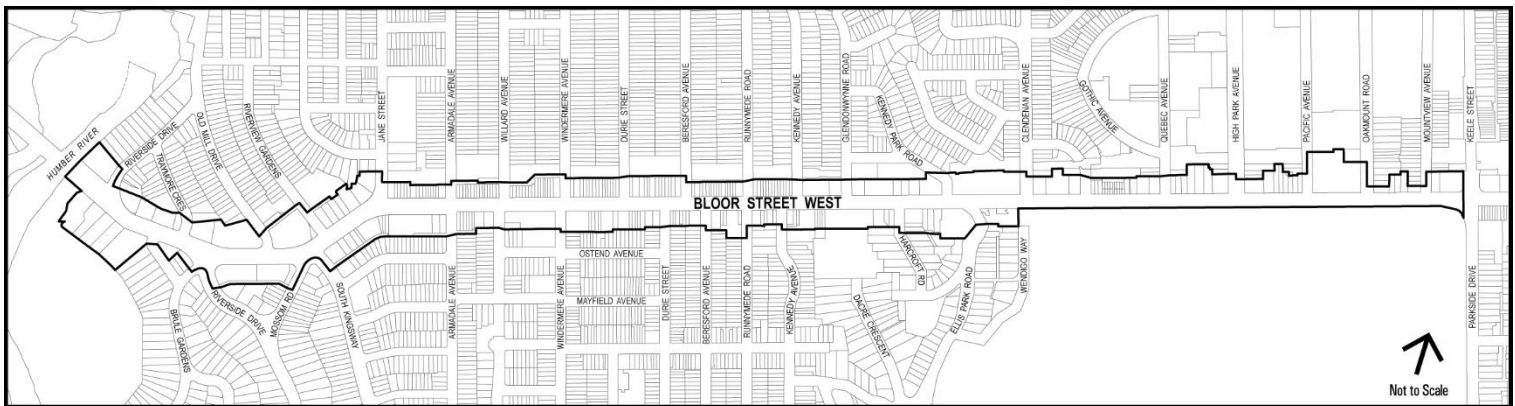
At this meeting, you can learn more about the policy framework, ask questions and share feedback about existing conditions, opportunities, and ideas you'd like to see considered in the policy framework to be presented to City Council for adoption no earlier than December 2024.

Details are as follows:

Date: October 15, 2024

Time: 7:00-8:30pm

Place: Runnymede United Church – Memorial Hall
432 Runnymede Road





Community Open House

Background Information:

At the July 8, 2014 meeting, City Council adopted a motion, which directed a planning study to be undertaken for the properties on Bloor Street West between Keele Street and the Humber River. In June 2016, City Planning issued a Request For Proposal (RFP No. 9121-16-7129) to potential proponents of the Avenue Study. Subsequently, in December of 2016, the contract for the Bloor West Village Avenue Study was awarded to a consulting team led by DTAH. The Avenue Study including recommended policy and design framework prepared by DTAH was received by City Council on June 26, 2018.

A separate Heritage Conservation District (HCD) study, led by City Planning's Heritage Planning, Policy and Research Unit and a consultant team for this portion of Bloor Street West. Further details regarding the scope and timing of the HCD Study can be obtained from Pourya Nazemi, Senior Heritage Planner at 416-338-5702 or Pourya.Nazemi@toronto.ca.

Contact:

Should you be interested in receiving additional information regarding the Bloor West Village Avenue Study, kindly contact our study co-lead team of Melanie Schneider, Senior Planner at (416) 397-7569 or Melanie.Schneider@toronto.ca, Nathan Bortolin, Urban Designer at (416) 392-5072 or Nathan.Bortolin@toronto.ca, or the local Councillor Gord Perks at (416) 392-7919 or Councillor_Perks@toronto.ca.

For more information, please also visit the Bloor West Village Avenue Study website:
www.toronto.ca/bwv-avenuestudy

For more information regarding the HCD Study, please visit the Bloor West Village HCD Study website:
<https://www.toronto.ca/city-government/planning-development/planning-studies-initiatives/bloor-street-west-heritage-conservation-district-study/>

Notice to correspondents:

Information will be collected in accordance with the Municipal Freedom of Information and Protection of Privacy Act. With the exception of personal information, all comments will become part of the public record.

Our public meeting locations are wheelchair/mobility device accessible. Other reasonable accommodation or 397-7569, Melanie.Schneider@toronto.ca with your request. The City of Toronto is committed to taking the necessary steps to insure compliance with the Accessibility for Ontarians with Disabilities Act, 2005.