

2025.TE27.29 Bloor West Village Avenue Study - Urban Design Guidelines - Final Report Lenka Holubec,  
Protect NatureTO

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**RE: 2025.TE27.29 Bloor West Village Avenue Study - Urban Design Guidelines**

Dear Chair, Vice Chair and Committee Members,

Thank you for this opportunity to comment on 2025.TE27.29 Bloor West Village Avenue Study - Urban Design Guidelines - Final Report.

As a participant of LAC (Local Advisory Committee) for BWVA Study, since it was initiated in late 2016, my focus was on the long term protection of significant natural heritage in vicinity of the Study [MAP of the Bloor West Avenue Study Area](#) – High Park and Humber River - [The ESAs](#) [The ANSI and PSWs](#) [Key Hydrologic Features](#)

The crucial importance to protect this area from development impacts is heightened by the fact that Study Area is completely within the watershed of the Grenadier Pond, designated in 2022 as PSW [Grenadier Pond PSW Wetland Complex Catchment basin TRCA March 2022](#).

As this part of city attracts development, BWVA Study is critical to provide continued protection of High Park and the Humber River to prevent and reverse negative impacts on natural heritage features and ecological function: [BWVA NH Impact Approach 200m High Park catchment](#)

In September 2015, the City Council adopted [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.

*“ii) Section 3.4 The Natural Environment*

***Revisions are made to the text of section 3.4 The Natural Environment to emphasize that the City's natural heritage system is significant both within and beyond Toronto and requires long term protection.”***

***“Policies 3.4.13 and 3.4.14 are refined to provide further direction on the protection and management of locally and provincially significant areas”***

***“Policy 3.4.14 is amended to make it consistent with the 2014 PPS”***

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 level compatible with protection to minimize direct/indirect/ cumulative impacts:

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

- ***Permitting maximum building heights of 27 metres (8 storeys);***
- *Requiring minimum building heights of 10 metres (3 storeys);*
- *Requiring a minimum step back of 3 metres at the street wall height of 20 metres (6 storeys)”*

And further committing to studying development impacts Natural Heritage and Hydrogeology:

[EY31.5 - Status Report – BWVA Study Natural Heritage, 2018.](#)

Unfortunately, several years of a gap opened the Study Area to more proposals and *“shifts in planning policy”*.

Today, a long term protection of significant natural heritage in vicinity of BWVA Study is even more critical as pressures of growth increasingly undermine the most valuable city’s ecosystems, wildlife habitats, the watersheds and biodiversity.

[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”***

These findings were further expanded in [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](#)***

It is imperative to achieve much better results for protected sensitive ecosystems of High Park and Humber River, than postulated from the terms in [TE27.29 - Bloor West Village Avenue Study - Urban Design Guidelines - Final Report](#) current version.

This Final Report should not be adopted, unless in consistency and conformity with the city adopted protection policies (*Chapter 3.3.4.14, 15*); PPS 2024, NHRM, 2010 (Official guide to PPS 2024) to uphold protection along BWVA Study and Toronto’s remaining protected nature.

**ASKS:**

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 recommended changes or minimally **Defer** the item to do recommended changes.

**Recommended changes:**

**1. 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.*"**

It seems that the Final Report and the Guidelines from October 2025 make efforts to implement changes regarding [Protected/Major Transit Station Area Bloor West Village Avenue Study Urban Design Guidelines - Final Report Oct 2025](#).

It is not clear why the Study's team planners and the city do not implement recently adopted into the OP Chapter 8 in regards to MTS/PMTS and ***“prioritize protection policies over any other development criteria policies.”***

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

## 2. Re-consider permitted height along the High Park frontage:

- **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](#)

*"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.*

*Individual applications will study the potential cumulative impacts on the ESA of similar built form proposed across the High Park frontage."*

The city settlement, from January 2025 <https://secure.toronto.ca/council/agenda-item.do?item=2025.CC26.5> with a revised proposal from 17 to 19 storey *1930-1938 Bloor Street West and 3, 5 and 21 Quebec Avenue*, should not be used as a base for [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](#).

We already know that more growth - more height and density - along High Park frontage will have direct but more concerning indirect, induced and cumulative impacts on natural features, ecological function and potentially the watershed (changes in hydrogeology).

**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.”**

**4. 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:**

[Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#) and [Urban Design Guidelines, October 2025, Draft October 2025](#) seem to prioritize the policies driving growth, while protection policies included in the OP Chapter 3. 3.4 14 and 15 are not nearly emphasized to conform to PPS 2024.

[Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#) states in reference to “Natural Heritage system” pg.10

*"When development is proposed in or near the natural heritage system, **the proposed development’s impact on the system is to be evaluated, and an impact study may be required, as described in Official Plan Policy 3.4.13, to minimize adverse impacts and, when possible, restore and enhance the natural heritage system.**"*

**3.4.13** is generally applicable to the Natural Heritage System, but not specifically the ESAs/ANSI, PWSs as these enjoy a higher level of protection in conformity now with PPS 2024. These policies were adopted into the OP to conform with Provincial Plans or does not conflict with them and under 3(1) of the Planning Act.

...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."*

Further, it follows from 3.4.15 *development on the lands adjacent to the ESA/ANSI/PSWs will be permitted only if it has been demonstrated, through a study, that there will be no negative impacts on the natural features or the ecological functions for which the area is identified (PSW, the habitat of threatened or endangered species; lands adjacent to provincially significant areas of natural and scientific interest, woodlands, valley lands and wildlife habitat).*

There is a difference between *may be required* and *will be required* and conformity of NHIS with PPS 2024 and its official guideline NHRM, 2010.

**5. 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 [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#) and [Urban Design Guidelines, October 2025, Draft October 2025](#)**

and

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

**6. Incorporate into [Urban Design Guidelines, October 2025, Draft October 2025](#) "1.5 POLICY CONTEXT "**

[PPS 2024](#)

*"How to Read the Provincial Planning Statement*

*The provincial policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic, health and social factors in land use planning. The Provincial Planning Statement supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas."*

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

4.8

*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.”*

**7. 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.”*

In conclusion, my concerns is [Bloor West Village Avenue Study – Urban Design Guidelines – Final Report](#), in its current version, has lost its original vision for the adjacent natural heritage: *"Protect and Preserve."*

This Final Report may not be in conformity with the city adopted protection laws in Chapter 3. 3.4. Natural Environment and consistent with the terms of PPS 2024.

Therefore, I cannot recommend adoption of this document, unless significantly improved.

It would be also a setback in respect to Toronto’s natural heritage and biodiversity goals to protect the ESAs and enhance biodiversity.

Yours sincerely,

Lenka Holubec, member of [ProtectNatureTO](#) and [HighParkNature](#)