

From: [Jeffrey Cowan](#)
To: [Toronto East York Community Council](#)
Cc: [Robert Walter-Joseph](#); [Chris Pereira](#); [Alan Leung](#); [patty.g](#); [Aris Giannopoulos](#); [Martin Katzman](#); [Kang Kindy](#)
Subject: [External Sender] TE27.26 38-50 Park Road Development Submission
Date: November 25, 2025 11:30:45 AM
Attachments: [Outlook-i3xpptp](#)
[Outlook-1520989875.png](#)
[Outlook-1520989897.png](#)
[Gladki Letter.pdf](#)
[Park Road Planning memo 30-36.pdf](#)

Dear Council Members:

We are a small group of residents at 30, 32, 34 and 36 Park Road, Toronto, ON, M4W 2N4 (the "Park Road Group") who are uniquely affected by the proposed captioned development; as the immediately adjacent properties on Park Road. As such, we are submitting a technical planning analysis and a more situational neighbour analysis, for the consideration of the members.

Attached please find the following:

1. A Planning Letter by Gladki Planning Associates, and
2. A Park Road Group neighbour memo with a couple of attachments.

We remain committed to best-use and appropriate planning for our ever expanding City and the overriding need for an absolute increase in housing.

On behalf of the Park Road Group:

Kind Regards,

Jeffrey D. Cowan

B.A., B.Comm., LL.B., J.D. M.B.A., LL.M. C.S.
Barrister, Solicitor & Notary Public

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November 22, 2025

By Email

Toronto East York Community Council
Toronto City Hall
100 Queen St. W.
Toronto, ON M5H 2N2

Dear Chair Moise and Members of Committee:

Subject: Comments on OPA/ZBA
38-50 Park Road (City File No. 25 209063 STE 11 OZ)
On behalf of 30-36 Park Road

Gladki Planning Associates has been retained by the owners of 30-36 Park Road (hereafter the 'client's lands') to review the application for an Official Plan and Zoning By-law Amendment facilitating the redevelopment of the adjacent lands at 38-50 Park Road. The adjacent proposal is for a 31-storey purpose-built rental building containing 289 dwelling units, including 40 rental replacement units.

We have attended the virtual Community Consultation Meeting held on October 23, 2025, and have reviewed the application materials available on the Application Information Centre, notably including the Architectural Plans, Planning Rationale, Block Context Plan, Civil and Utility Plans, Draft Official Plan Amendment, and Draft Zoning By-law Amendment. We have also reviewed the Refusal Report prepared by Community Planning for consideration by Toronto and East York Community Council.

We are providing the following comments on behalf of the client's lands; whose properties are immediately adjacent to the applicant's site.

In line with the recommendation of City Planning, we are writing to **support refusal of the application** and to set out our client's specific planning concerns. In particular, our clients are directly and immediately affected: in our opinion, the proposal would significantly erode the livability and usability of the existing buildings at 30-36 Park Road and would unduly constrain any future, policy-supported redevelopment of their lands.

We support purpose-built rental housing. Our client's concern is that the adjacent lands at 38-50 Park Road are not able to support a tall building on a small, constrained development block without unacceptable impacts on their properties at 30-36 Park Road and without precluding the logical and orderly development of the block. As set out below, the applicable Official Plan policies, Site and Area Specific Policies, city-wide and Downtown tall building guidelines do not support the development proposal as currently configured.

DESCRIPTION OF OUR CLIENT'S LANDS

Our client's property is located on the west side of Park Road, just north of Bloor Street East, in Toronto's Bloor-Yorkville area. The client's lands comprise four parcels, municipally known as 30, 32, 34, and 36 Park Road. The site is currently occupied by two principal structures including two semi-detached buildings containing office, service-related uses and residential uses.



Figure 1 - Aerial Image of the Client's Lands

The client's lands situated within a highly urban, mixed-use context characterized by a combination of residential, retail, office, and institutional buildings. It is highly transit-accessible, located a short walk from the Bloor-Yonge and Bay subway stations, and is within the delineated Bloor-Yonge Protected Major Transit Station Area (PMTSA).

PROPOSED DEVELOPMENT OF THE ADJACENT LANDS AT 38-50 PARK ROAD

On August 12, 2025, an application for an Official Plan and Zoning By-law Amendment was submitted on behalf of 1001271409 Ontario Limited, Helberg Properties Limited and Peberg Corporation for the lands municipally known as 38, 40 and 50 Park Road.



Figure 2 - Render of Proposed Adjacent Development Showing Park Road Frontage

The application proposes a 31-storey (107.9 metres) purpose-built rental building and the restoration and adaptive reuse of the heritage building at 50 Park Road, which is proposed to be integrated into the new development.

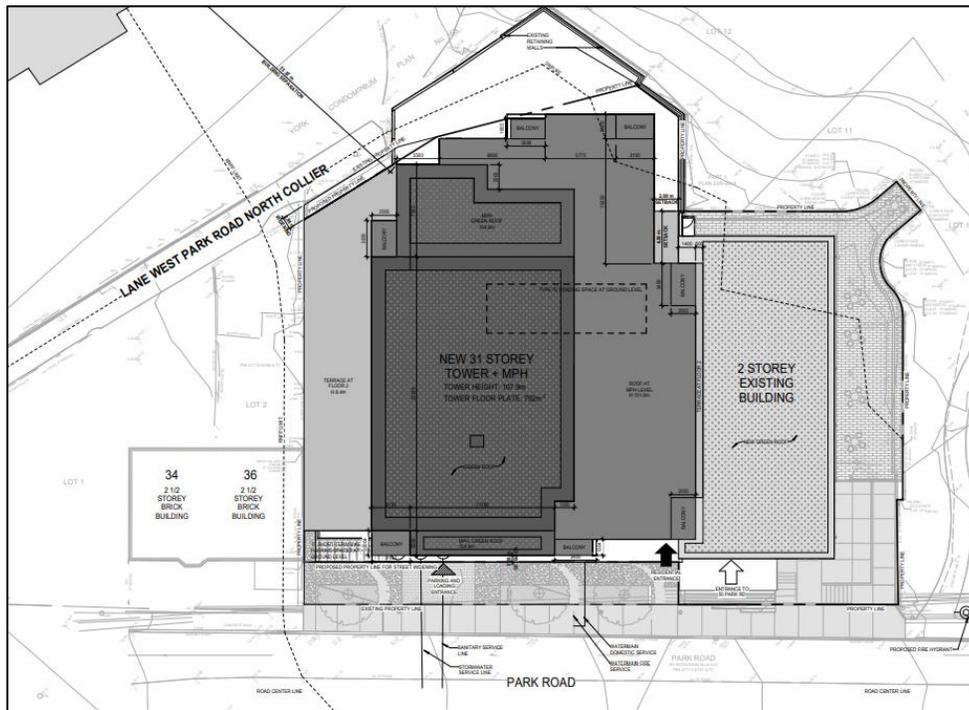


Figure 3 - Excerpt of Proposed Site Plan

The proposed development includes 289 purpose-built dwelling units, inclusive of 40 rental replacement units and 249 new market rental dwelling units. Overall, the proposed development includes a total gross floor area of approximately 25,041 square metres, resulting in a density of 14.2 FSI. The proposal also incorporates a 0.98-metre laneway widening adjacent to the rear of the 38 and 40 Park Road properties, which would contribute to an ultimate laneway width of 5.0 metres.

The application proposes the removal of three trees to accommodate the proposed development. 'Tree I', identified on 36 Park Road is proposed to be removed to facilitate the shoring for the proposed underground structure up to the boundary of the property, 0.6 metres from the base of the tree. This Tree is identified as a protected tree by the City of Toronto Ravine and Natural Feature Protection By-law. Also, as 'Tree I' is not located on the adjacent development site, written consent from the owner of 36 Park Road is required prior to the removal of this tree.

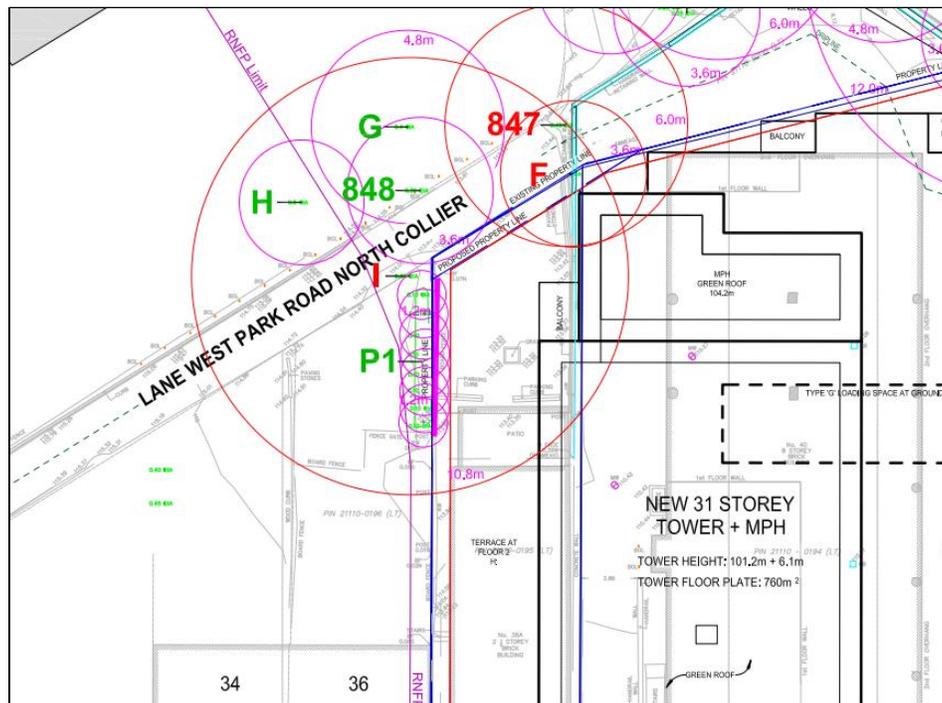


Figure 4 - Excerpt of Applicant's Tree Inventory & Preservation Plan Showing the Proposed Removal of I and Location of P1 Trees

Work within the minimum Tree Protection Zone of a row of eight trees (with diameters at breast height of less than 10cm) located on 36 Park Road on the Client's Lands is also required to accommodate the proposed development.

The vehicular entrance providing access to parking and loading facilities at grade is located within seven metres of the southwest property line adjacent to 38 Park Road. A non-uniform road widening is proposed permitting up to a 3.45 metre widening over a portion of the lands. This represents a reduction of 1.2m from the 4.65m widening required to facilitate a 20 metre right-of-way. No widening is proposed over the portion of the lands addressed as 50 Park Road. An amendment to Map 3 of the City of Toronto Official Plan is proposed which would facilitate a right-of-way up to approximately 17.6 metres.

PLANNING CONSIDERATIONS

While our client is supportive of intensification in a transit-oriented area, we have significant concerns that the proposal, in its current form, represents overdevelopment of a constrained site and fails to provide appropriate setbacks, transition, and tower separation, disrupting the logical and orderly development of the block and resulting in undue adverse impacts on our client's property. These considerations arise from the Planning Policy Framework and are detailed below:

Direct Impacts of the 38-50 Park Road Proposal

The application, as submitted, creates a series of direct, negative impacts on our client's lands and the public realm, and is not aligned with the Planning Policy Framework.

CONTEXT, TRANSITION AND TOWER SETBACK

The proposed development does not provide compliant tower separation distances as it does not incorporate adequate setbacks and the proposal does not transition to our client's lands which are designated as *Neighbourhoods* and within the "Asquith-Collier Neighbourhoods" as included within SASP 211.

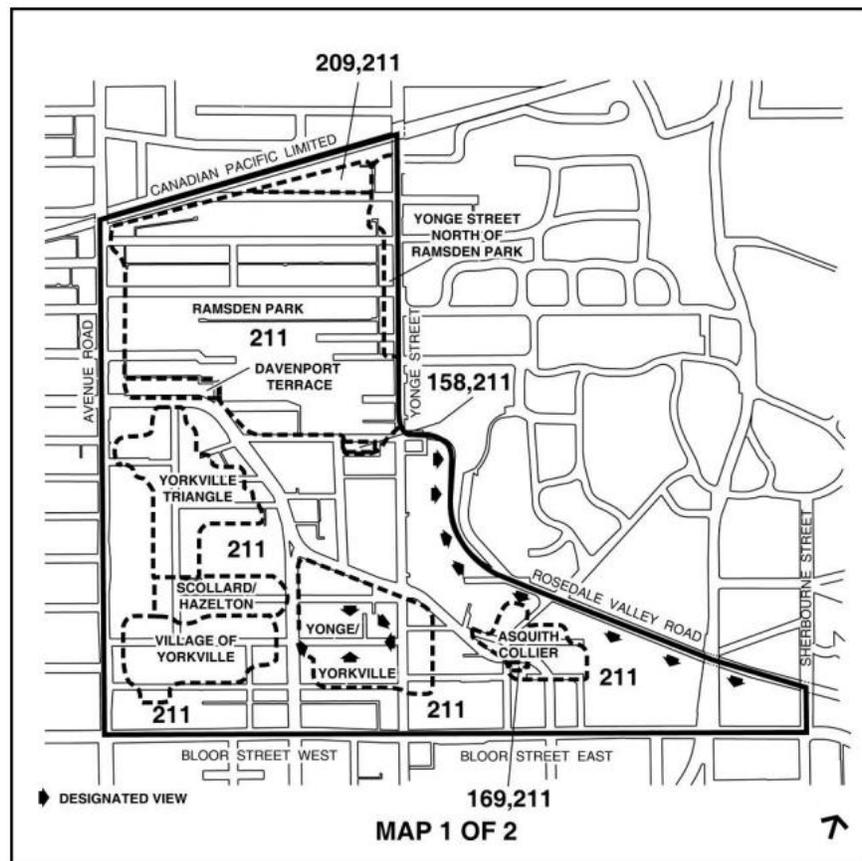


Figure 5 - Excerpt of Map 1 SASP 211, Neighbourhoods, Areas of Special Identity and Designated Views

Unlike recent development proposals within the immediate vicinity, the adjacent lands identified within *low-rise areas* as indicated on Map 2 of SASP 211 requiring new building to achieve a harmonious relationship to their built form context through building height, massing setback as well as integrated vehicle access and loading among other considerations.

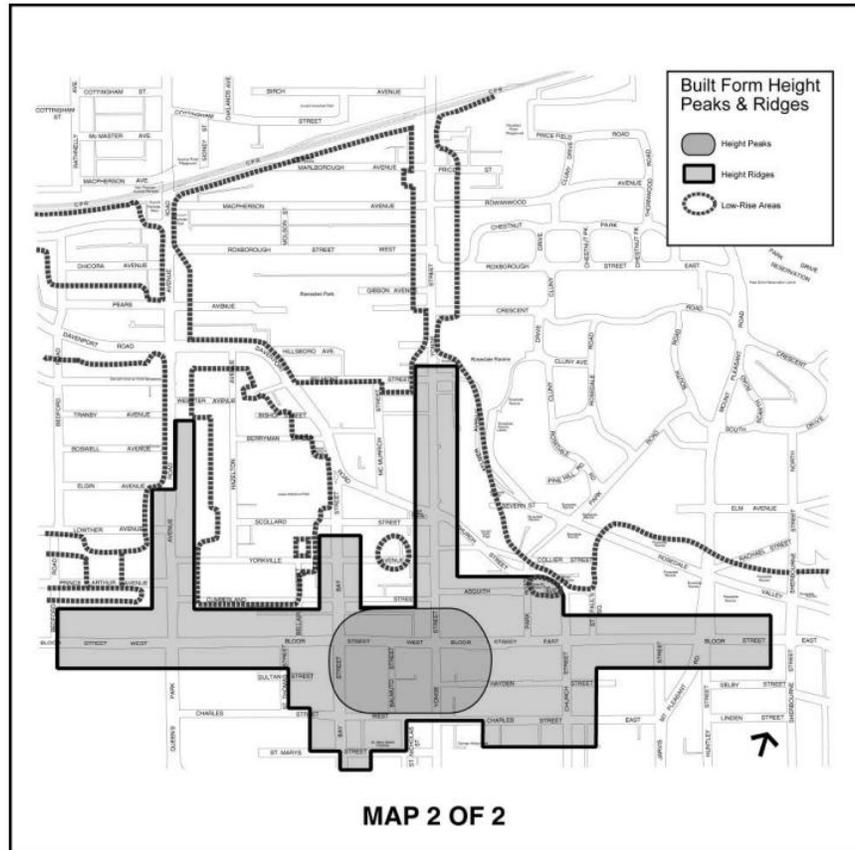


Figure 6 - Excerpt of Map 2 SASP 211, Built Form Height Peaks & Ridges

Further, new development within the Asquith-Collier Neighbourhoods is required to respect and reinforce the established character and be contextually similar and appropriate to the individual setting and pattern of development of the area. Applying over a portion of the lands situated north of Park Road, the proposed development disrupts the prevailing development pattern and provides an abrupt transition to the residual low-rise context. The policy requires development to be designed with sufficient setbacks, angular planes and transitions in scale to adequately limit privacy impacts.

Site and Area Specific Plan 517(a) requires that tall buildings provide setbacks from lot lines to achieve separation allowing the individual tall building and cumulative effect of multiple tall buildings to contribute to building strong, healthy communities that fit with the existing and planned context. The policy also recognizes that not every site can accommodate a tall building and that a coordinated comprehensive block planning process may be used to locate and design tall buildings able to achieve the intent of the policy.

The Downtown Tall Buildings Supplementary Design Guideline #1 states that when a tall building abuts a lower-scale neighbourhood area, the tower portion shall be setback 20 metres from the abutting property line.

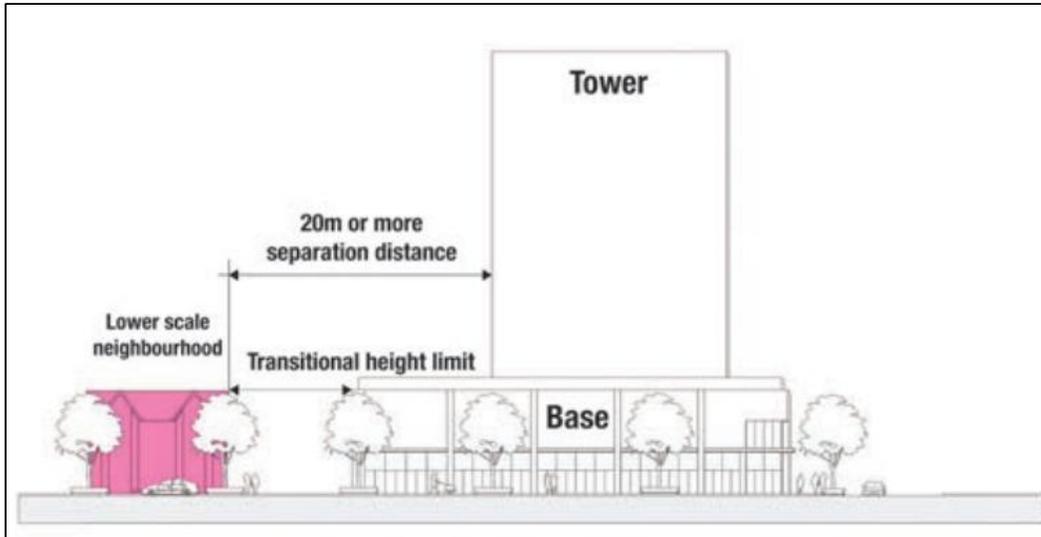


Figure 7 - Excerpt Conceptual Illustration of Minimum Tower Setback and Transitioning Height of the Base in Relationship to Adjacent Lower Scale Building, Downtown Tall Buildings Supplementary Guidelines

The Downtown Plan (Policies 9.25.1 & 9.25.2) reinforces this by requiring separation and stepping down for tall-to-low-rise adjacencies.

TREE INJURY AND REMOVAL

The application materials indicate the proposed removal of 'Tree I', a protected tree under the Ravine and Natural Feature Protection By-law located on our client's land (36 Park Road), to facilitate shoring. The consent and approval of the owner of 36 Park Road will be required to facilitate this removal. Furthermore, work is proposed within the minimum Tree Protection Zone of a row of eight additional trees located on our client's land, further demonstrating an overreach onto the adjacent property.

SITE ACCESS, CIRCULATION, AND PUBLIC REALM CONTRIBUTIONS

The proposed vehicular site access of the adjacent development is located within eight metres of the shared property line with 38 Park Road. The proposed location would potentially impact the access configuration of in any future development of the client's lands as a result of multiple, closely-spaced curb-cuts on Park Road.

Potential Optimal Development Configuration of the Client's Lands

PERMITTED AS-OF-RIGHT MID-RISE DEVELOPMENT

The client's lands are designated as *Neighbourhoods* and are located within the Bloor-Yonge Protected Major Transit Station Area. Policy 8.5.8 (OPA 540 as modified) permits multiplex and apartment buildings in *Neighbourhoods* without an Official Plan Amendment up to four storeys, and up to six storeys within 200 metres of a transit station or where fronting a major street shown on Map 3. This establishes a clear baseline for mid-rise intensification on the client's lands.

SUITABILITY FOR A TALL MID-RISE FORM

Given frontage on a planned 20-metre right-of-way (Map 3), and having regard to applicable policies and recent approvals, the client's lands are appropriate for a *tall mid-rise* building that may exceed a 1:1 height-to-right-of-way ratio on Park Road, subject to meeting transition, shadow, privacy and wind criteria. In consideration of area approvals, a 7-10 storey mid-rise could be contemplated through amendments, where it demonstrably meets built-form and public realm objectives.

SITE SPECIFIC CONSTRAINTS

The client's lands are constrained by site geometry, and adjacency to the existing apartment building to the west. These constraints limit achievable floorplates and require generous setbacks, separation, and transition to low-rise dwellings. As a result, while a policy-supported mid-rise is feasible, the development potential is effectively constrained and dependent on careful massing and access solutions that do not rely on adjacent properties.

Preclusion of Orderly and Coordinated Development of the Surrounding lands

Given the small-lot pattern, shallow depths, and sensitivity of surrounding *Neighbourhoods* and open spaces, neither 38-50 Park Road nor 30-36 Park Road can, on their own, satisfy the tall building numeric tests for setbacks, separation, floorplate and transition without unacceptable impacts or reliance on the other site. The applicant's site (38-50 Park Road) and our client's lands (30-36 Park Road) are individually constrained.

Proceeding with a standalone tower at 38-50 Park Road would diminish the potential development opportunity available to the client's lands, precluding logical and orderly redevelopment.

CONCLUSION

We are supportive of the principle of intensification and of adding new purpose-built rental housing on this block. However, the proposed development as it is currently configured raises serious concerns.

In our opinion, if approved in its current form, the proposal would:

- (1) Significantly erode the livability and usability of the existing buildings on the subject lands as they function today; and,
- (2) The proposal would effectively preclude a feasible, policy-supported redevelopment of the subject lands in the future.

The proposed development represents an uncoordinated approach to the development of a constrained block. The proposal relies on minimal setbacks, non-compliant tower separation and construction impacts that extend into the tree protection zone of neighbouring trees located on the client's lands. These elements, combined with the proximity of the proposed driveway and loading operation would materially diminish the amenity, privacy and day-to-day operations of the existing buildings.

With respect to future redevelopment, the siting of the proposed tower and its minimal setback from existing property boundaries leaves little flexibility for appropriately scaled development on the subject lands or for coordinated redevelopment across the block. The proposal does not provide an appropriate transition to the adjacent residual *Neighbourhood* and does not achieve appropriate setbacks and separation from lot lines and existing low-rise buildings. The position of the parking and loading operation also present an inefficient access configuration that further impacts the block. The effect of the proposal would yield an uncoordinated built-form outcome that is not consistent with the intent of SASP 517(d) or good planning principles.

The City's Official Plan, including the Downtown Plan, SASP 211 and SASP 517(d), provides the most specific policy direction for this block. These policies require development to be sensitive to the surrounding context, provide appropriate transition to *Neighbourhoods* and facilitate access to ravine lands, and be coordinated at the block scale. In our view, a development proposal must first address these specific policy directions over more general city-wide objectives of intensification. These specific requirements are not satisfied by the current proposal.

In addition, Park Road currently carries a significant volume of traffic and has a constrained width with limited area allocated to vehicular travel lanes or pedestrian sidewalks. The proposed location of vehicular access and loading exacerbate existing operational and safety concerns and would further constrain any future access strategy for the client's lands. A comprehensive approach to redevelopment of the block could examine alternative access arrangements, including potential access from the existing lane located off of Collier Street.

These site-specific constraints cannot be resolved in isolation. Proceeding with the current proposal would create negative built-form, functional and traffic impacts and would preclude a more logical and orderly outcome for the entire block, as envisioned in SASP 517(d) and SASP 211.

Therefore, we respectfully **request that the City refuse this application** and initiate a coordinated block planning exercise together with the owners of 30-36 Park Road and other affected landowners. This

process is necessary to address the shared concerns identified in this letter and to determine the appropriate, coordinated development configuration for these lands, consistent with the City's planning framework.

Sincerely,

Gladki Planning Associates Inc.

Per:

A handwritten signature in black ink, consisting of a large, stylized 'R' followed by a series of loops and a long horizontal stroke extending to the right.

Robert Walter-Joseph, RPP, MCIP

Principal

Gladki Planning Associates

(416) 362-7755 x. 100

rwalterj@gladkiplanning.com

Memo

We are submitting this memo in support of our planning analysis to provide the Toronto and East York Community Council with additional practical and situational context. These comments come directly from the residents who live and work on Park Road and who experience its challenges and opportunities every day. Our observations are grouped into three categories:

1. Historical background
2. Logistical considerations
3. Streetscape considerations

1. Historical Background

1. **Collective approach to land assembly**

Over the past decade, the neighbors at 30 to 38 Park Road have received numerous inquiries from potential developers—from small land assemblers to reputable, established builders who executed full Agreements of Purchase and Sale. Throughout this period, we have consistently acted in unity, requesting the same purchase price for all five properties, and except for our neighbours at 38 Park Road, we continue to do so today. We sent an email to Ms. Schadeburg-Herrmann (Peberg) on July 30, 2024 requesting she consider developing all 5 properties, to which we received absolutely no response. Although not surprising, we think it may have planted the seed for the developer's current plan, their lack of considering 30-36 Park Road and it also illustrates our long-term commitment to collaborative development of Park Road.

2. **Support for appropriate development**

The Park Road Group recognizes that the location—immediately proximate to Toronto's busiest transit hub with a walk score of 100—is prime for redevelopment. We are not opposed to intensification; in fact, we welcome

the opportunity for an appropriate, efficient, and well-planned use of these lands.

3. **Existing built form limitations**

We acknowledge that our current buildings do not significantly contribute to the aesthetics of the street (as reflected in the attached photos). They consist of four mismatched semi-detached, mixed-use buildings more than 100 years old, lacking cohesion and not providing a fitting entryway into the city for the thousands who use Park Road and Rosedale Valley Road daily.

4. **Role of Park Road as a primary access route**

Park Road serves several key user groups:

- **(a) Local residents and schoolchildren with their parents**, including those attending Branksome Hall and Rosedale Public School.
- **(b) A large number of cyclists**, many using Park Road to access Rosedale Valley Road and surrounding cycling networks. Historic collisions—including fatalities—have occurred on this narrow roadway, and further lane reductions during construction would only heighten the danger.
- **(c) Thousands of daily vehicular commuters**, whose presence already produces congestion that is likely to worsen.
- **(d) Long-time residents and business owners**, who can attest firsthand that Park Road is an essential, heavily used north–south route.

2. Logistical Considerations

With traffic on Park Road steadily increasing and redevelopment inevitable, it is critical to consider how construction can proceed without creating long-term dysfunction. Our primary concerns are as follows:

1. **Inevitable lane closures**

Building the proposed 31-storey tower would almost certainly force Park Road down to a single operational lane for several years, severely disrupting vehicular, pedestrian, and cycling traffic.

2. **Limited sidewalk improvements**

The proposed sidewalk widening applies only to the narrow frontage of the new development. Meanwhile, the sidewalk in front of 30–36 Park Road would remain at its outdated width of 1.5 meters rather than the City-mandated 2.1 meters—hardly suitable for a steep, high-traffic pedestrian corridor.

3. **Constraints of the rear laneway**

The existing 2-meter-wide laneway behind 30–38 Park Road must remain accessible to residents for daily parking ingress and egress. Its width makes it permanently unsuitable for construction vehicles, delivery trucks, or garbage collection.

4. **Need for a sidewalk on the east side during construction**

To maintain safe pedestrian access during construction, a temporary sidewalk must be created on the east side of Park Road (within the adjacent parkland). This requirement should reasonably be addressed by the developer to offset the disruption caused.

5. **Permanent access issues**

The development proposes vehicular ingress and egress for a 31 storey building directly onto Park Road—an already strained road.¹ This will further exacerbate long-standing traffic issues and worsen congestion indefinitely.

3. Streetscape Considerations

We believe the current proposal has not fully accounted for its long-term physical, visual, and urban impacts on Park Road.

1. **Lack of cohesion with surrounding properties**

A key principle of good city planning is the creation of enhanced, coherent, and attractive streetscapes. The proposal, as currently designed, would create an abrupt and discordant mix of tower forms, a short section of widened sidewalk, and four older low-rise properties left without integration into the larger built form.

2. **Importance of a unified gateway streetscape**

As a major access point to Yonge and Bloor—with high volumes of pedestrians, cyclists, and vehicles—it is essential that this street be developed with continuity and foresight. The current proposal does not achieve the unified, welcoming, and well-designed entrance that this area demands.

3. **Creation of “orphaned properties”**

The proposal leaves 30–36 Park Road—older and visually inconsistent buildings—sandwiched between two 30-storey towers and an existing 16-storey tower. This result is not only visually incompatible but also, in our view, indicative of poor planning.

² This would include not only resident parking but also deliveries, Ubers, garbage disposal trucks and guests of the residents.

In fact, when we revisited the possibility of a full assembly with our most recent developer, Brian Brown (CEO) of Lifetime Developments, he responded on October 18, 2025:

“Thanks for reaching out and for thinking of us. Unfortunately, the site was small when it included 38 Park in the assembly. Now that it is just 30–36 Park I think it is too small a development for us.”

This underscores the site’s inadequacy when fragmented and the sterilization of the Park Road Group’s land to future development.

Summary and Conclusions

We strongly encourage the City and the applicant to explore the possibility of incorporating 30–36 Park Road into a more comprehensive and functional development plan—potentially through an enlarged podium extending southward.

A more integrated plan would offer significant benefits:

- 1. A better use of land under the PMTSA framework**
Additional land could support a 7–10 storey podium with ground-floor commercial or community-serving uses such as medical or dental services. This would enhance density while providing meaningful amenities.
- 2. Opportunity to use the rear laneway for setbacks**
If the City were willing to contribute or reconfigure the laneway, the development could achieve superior massing and functionality.
- 3. Safer, less disruptive construction logistics**
Working from 30–38 Park Road would allow construction staging—including cranes and cement trucks—to occur off-street, reducing or potentially avoiding the need to close Park Road and enabling two-lane traffic during construction.
- 4. Improved long-term traffic flow**
Shifting access to the corner of Collier and Park Road would significantly reduce pressure on Park Road itself.
- 5. A cohesive and attractive streetscape**
A unified development would allow for wider sidewalks, trees, greenery, and a more pleasant pedestrian experience—especially for families walking to school and residents accessing Rosedale Valley Road and Rosedale beyond.
- 6. Prejudicial Development Plan**

Our development rights as neighbours are severely compromised and prejudiced by the present plans for 38-50 Park Road in numerous ways; as set out in the Gladki Planning Letter and the facts contained herein. There

appears to be very little thought given by the developers to the smaller parcel of leftover land with four mismatched buildings and the obvious *permanent diminution in the market value* of these properties.

We would welcome the opportunity to discuss our position further. We hope this memo provides the Council with helpful context and meaningful considerations as it evaluates the proposed development at 38–50 Park Road.

Sincerely,

The Residents of 30, 32, 34 and 36 Park Road



34/36/38 and 40 Park Road



30/32 Park Road (66 Collier to left with 34/36/38/40 to the right).



66 Collier – 16 stories.