



Central Bayview Block Plan for Midrise Buildings YMRA Position Statement

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The Central Bayview Block Plan is a community-authored discussion document that outlines local context, infrastructure constraints, and neighbourhood priorities.

It is not intended to serve as a Secondary Plan, Official Plan Amendment, or statutory planning instrument. YMRA instead asks the City to identify the appropriate planning instrument, engineering tools, and legal framework without limiting Council's discretion or prejudging any application.

Disclaimer

This Position Statement, and the views expressed in it, are presented by YMRA 'without prejudice' to any legal actions arising in the course of the City's review and possible appeals.

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1. Executive Summary

Large, contiguous lots and **high development interest** in a premium neighbourhood are two conditions which **make the Central Bayview Ave.** (segment of Bayview Ave. that runs from Lawrence Rd. to Hwy 401) **highly susceptible to large-scale redevelopment**. YMRA anticipates midrise buildings will line most of this corridor after redevelopment. The central issue for this document is not any individual redevelopment project, but the **cumulative impact** of dozens of midrise buildings expected to come up along this corridor.

In this document, based on our lived experience, we discuss various concerns regarding streetscape assessment, assembly potential, infrastructure capacity, land use recommendations, built form guidelines and environmental challenges. We also discuss several potential measures for City's consideration so that this neighbourhood may absorb a significant increase in intensity. Here is a sampling of some of the key issues addressed:

1. Neighbourhood Character

- **Lot assembly** deeper into interior neighbourhood (i.e. lots not abutting Bayview Ave. or lots beyond EHON Major Streets map (Map 3)) can cause significant disruption and displacement in the neighbourhood, **especially along small, dead-end or circular streets**.
- The housing stock in this neighbourhood, known to be one of the most expensive neighbourhoods, is increasingly unaffordable for most young and growing families. The new midrise buildings should provide a **higher number of family size units to attract diverse family sizes, including multigenerational families, as well as to retain growing families** and prevent their displacement to lesser expensive neighbourhoods as they grow.

2. Traffic

- Bayview Ave. is the **only north–south arterial road to downtown** on the east of Yonge, aside from the DVP. Rush-hour **queues already exceed a kilometer** and **complex, dangerous turning movements** are required. Midrise developments on both sides of Bayview Ave. will significantly increase these complex turning movements worsening **middle lane stress and gridlock**.
- There is a strong case for expanding NY27.15 Traffic Review as a **Corridor Study**, given the network role of Bayview Ave., rush hour queues, public transit unreliability and chronic delays, constrained right of way, several institutional traffic generators and lane reductions in this corridor.

3. Street Parking and Access

- Side streets are already experiencing **spillover parking on both sides** of these narrow streets limiting access, especially of larger emergency and delivery vehicles. The situation is significantly **worse for small, dead-end or circular streets** as these intersections are the sole access points.

4. Built-Form & Land-Use Recommendations:

- There are several site plan elements for consideration, such as **underground parking footprint, underground parking access/driveway**, placement of **green roofs** and mechanical rooms, orientation of **amenity spaces, garbage collection** and **institutional uses**.
- It is not clear **what City's projections are for density along the Central Bayview Corridor and what is its infrastructure capacity**. However, the YMRA community expects a large number of midrise

buildings which coupled with the large lots can afford step backs lower than 6 storeys or rear angular planes to achieve a very high density for this neighbourhood.

5. Environmental Risks

- **Large-scale excavation for underground parking** threatens tree canopy, soil volumes, and stormwater management. **Multi-level underground parking** (below MAGWL) makes this worse.
- **Large-scale hardscaping** will remove mature trees, reduce permeable surfaces, cause stormwater concerns and accessible **parkland deficits**.
- This corridor sits adjacent to **floodplains within meters to half a kilometer** on either side and has side streets with **culverts that are either poorly maintained or potentially too small to handle the drainage**.
- Consequently, it is not surprising that homes along this corridor are prone to flooding and lie within the **officially designated Basement Flooding Study Areas 43 and 58—where recurring storm-related flooding has been documented**. The City has conducted a comprehensive Environmental Assessment and determined that **long-term infrastructure investments are necessary to reduce surface and basement flood risks**. **Increasing density before upgrading the infrastructure will be premature and only worsen the situation**.

In this regard, we also discuss the experience of the Golden Mile community and the **precedent of the Golden Mile Secondary Plan** which underscores the importance of integrated planning. When intensification occurs without corresponding infrastructure investments, neighbourhoods face persistent and costly challenges that can undermine long-term viability of a neighbourhood and quality of life of the community. **By incorporating an H-provision (Holding provision) into the planning framework** for specific conditions (such as, completion of infrastructure upgrades or community amenities) to be met before new projects proceed, the H-provision ensures that **growth will only occur once the neighbourhood is equipped to handle it**.

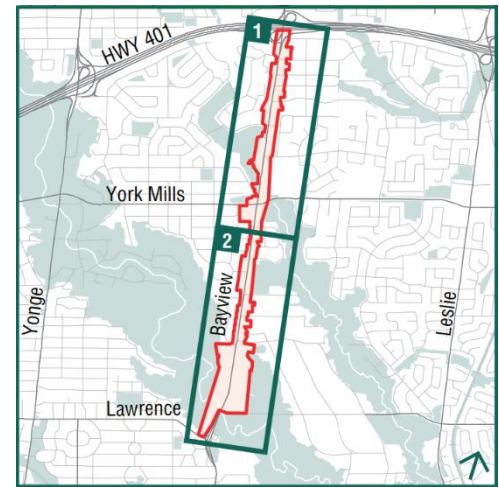
YMRA is not opposing development. We are asking for **coordinated planning** so that the longitudinal growth is sustainable, and infrastructure keeps pace, otherwise mitigation measures may be too late to implement, and this corridor may only become **a cautionary example for other Toronto neighbourhoods**. A Bayview Avenue Block Plan will allow intensification to proceed responsibly and with community support.

2. About YMRA

The York Mills Residents Association (YMRA) is a registered, non-profit organization dedicated to advocating for the interests of residents within Ward 15, North York. **YMRA was established in 1954** and its current jurisdiction extends from south of Highway 401 to north of Arjay Crescent and Hyde Park, and from east of Bayview Avenue and Hedgewood Road to west of Leslie Street and Windfields Park. **YMRA proudly represents over 10,000 households** in the ward, fostering community engagement and promoting neighbourhood well-being.

3. About the Central Bayview Ave. corridor within YMRA boundaries

The York Mills Residents Association (YMRA) has consistently demonstrated leadership in supporting thoughtful redevelopment and gentle intensification within its community. Long before the City's recent adoption of the recent gentle intensification policies under EHON, YMRA actively partnered with City officials to shape the neighbourhood's evolution, setting a precedent nearly a decade earlier with the introduction of the **Bayview Townhouse Design Guidelines in 2015**. These forward-thinking guidelines enabled the redevelopment of multiple properties along a 3.7 km corridor of Bayview Ave.—from Lawrence Rd to Hwy 401 (refer to the adjacent diagram)—and fostered a collaborative environment, preventing any disputes or litigations between the developers and the local community. The focus of this document remains on this same stretch of Bayview Ave., as originally set out in the Bayview Townhouse Design Guidelines.



Central Bayview Corridor map excerpted from *Bayview Townhouse Guidelines 2015 – Part 3* *

4. Need for developing Central Bayview Avenue block plan

There are compelling reasons why this particular segment of Bayview Ave. required intensification guidelines ahead of other areas in the city—a reality that remains relevant today.

The impetus for developing a block plan arises from the notable increase in midrise development applications, as well as the expectation of continued proposals for the entire Central Bayview Ave. corridor in the foreseeable future. This outlook is rooted in the neighbourhood's longstanding experience with sustained development pressure. The community is deeply concerned that, in the absence of a **thorough, integrated review and strategic plan addressing the rapid redevelopment of the entire Central Bayview Ave. corridor, rather than a piecemeal approach of focusing on one development application at a time**, the scalability and long-term sustainability of growth in this area would be compromised. YMRA believes a **holistic, long-term vision for midrise development** is essential. Such an approach will help ensure that future growth is both sustainable and scalable, safeguarding the well-being of current and future residents. Without a comprehensive, integrated approach to intensification, there is a genuine risk that important lessons and challenges will only become apparent after it is too late to effectively address them. This could result in lasting harm to the neighbourhood and set a bad precedent for intensification efforts elsewhere in Toronto.

This document highlights some of the key challenges and offers recommendations to promote a high quality of life for all, while protecting the neighbourhood from the kinds of negative outcomes that could

discourage residents and visitors from choosing to live in or travel through this iconic part of the city. We acknowledge that the recommendations are some of the preliminary suggestions and a consultative process within the community is ongoing. The community is open to considering alternatives and suggestions.

4.1 Exceptional and rapid midrise development potential

The unique character of this stretch of Bayview Ave. is defined by its **expansive, contiguous lots**—a feature that uniquely positions the area for midrise construction. Unlike many urban neighbourhoods where developers must painstakingly assemble several smaller parcels to achieve the required building footprint, Bayview Ave.'s large lots simplify and expedite the development process, **enabling swift transformation and reducing barriers to entry for new projects**.

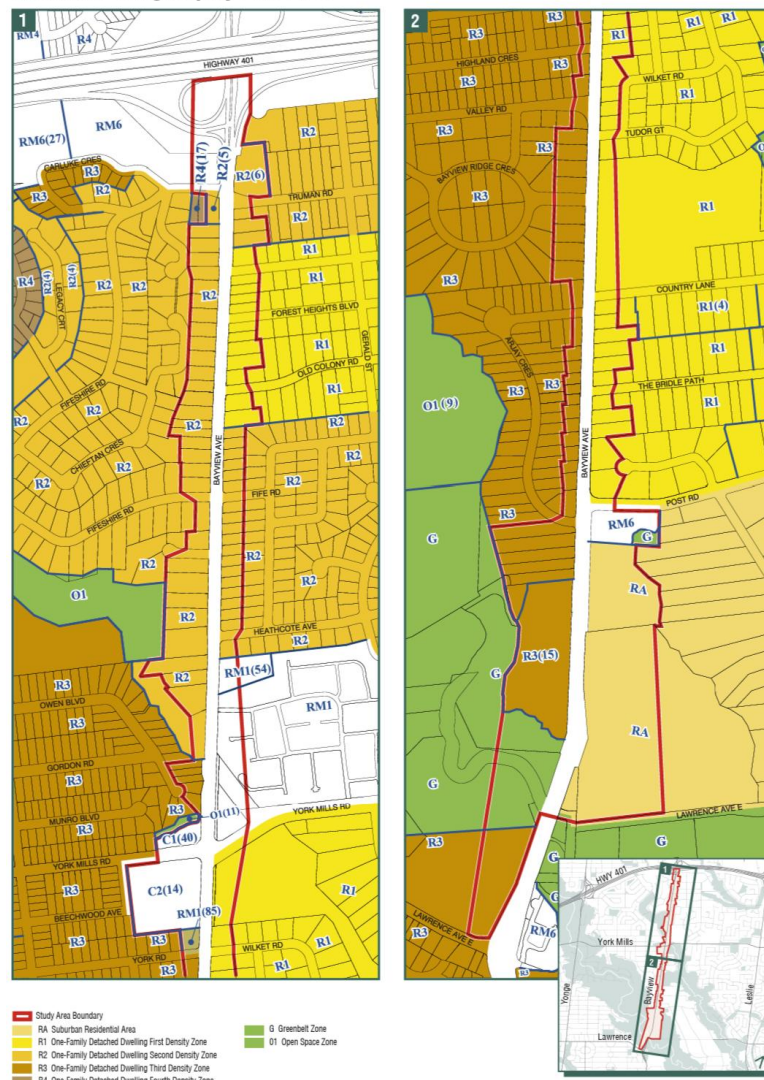
Additionally, this neighbourhood's reputation as a **pre-eminent community** has made it a consistent target for development proposals, further accelerating the pace of change.

Due to these two factors—**prime location and spacious lots**—the area is expected to experience **an unprecedented surge in midrise redevelopment applications**. This rapid transformation is already evident from the recent influx of applications and is expected to outpace comparable neighbourhoods of the city, reshaping the community at a scale and speed not previously experienced.

In response to these historic, ongoing pressures, the Bayview Townhouse Design Guidelines have previously provided valuable direction for the redevelopment of detached homes into townhouse complexes without acrimony or disputes between the developers and the community. However, **there is now a clear need to establish comparable approach for midrise projects**. Such approach should ensure that new developments align with existing bylaws, maintain the intent behind community planning, and preserve the neighbourhood's essential qualities. This approach will help manage growth proactively and without acrimony between the developers and the community while a piecemeal development approach could undermine local character and cause contestations between the developers and the community on a case-by-case basis.

4.2 Preserve neighbourhood character and prevent large scale disruption

Extracted Zoning Map By-Law 7625



Lots included in Bayview Townhouse Design Guidelines and EHON

In order to preserve Neighbourhood Character and prevent large scale disruption, lot assembly should be limited exclusively to properties facing or directly abutting Bayview Avenue by **adhering to the lots included in the EHON Major Streets map (Map 3) only**, just as done in the 2015 Bayview Townhouse Design Guidelines*. Preventing expansion of lot assembly deeper into interior neighbourhood maintains the residential scale, rhythm, and character of existing streetscapes.

This stretch of Bayview Ave. should be excluded from the Avenues map especially sections with small, dead-end or circular streets. Applying the Avenues policy to this area, especially to small, dead-end or circular streets, would be particularly harmful, as it could encourage a level of intensification far greater than what is appropriate for streets identified as EHON Major Streets. **These smaller streets lack the**

necessary width, circulation, and infrastructure capacity to support such increased density, which would worsen the concerns outlined throughout this document and contribute towards a large scale disruption and displacement in the neighbourhood.

5. Concern of investor-oriented rather than family-oriented development

5.1 Encourage diverse and family-oriented housing options

There is apprehension that investor-driven development will prioritize investor interests—such as maximizing returns through smaller, studio and single-bedroom units—over the needs of diverse and multi-generational households seeking larger, multi-bedroom homes.

The current Growing Up Guidelines set the minimum number of family-units at 25% (15% two-bedroom + 10% three-bedroom units). **This 25% threshold is insufficient, particularly in a neighbourhood where existing housing stock is increasingly unaffordable for young and growing families**, which will prohibit growing and multigenerational families to move into the neighbourhood and lead to the eventual displacement of growing families who decided to move here.

A minimum threshold of 50% family units would ensure that new developments genuinely support families, offering space for children, extended family, and multi-generational living—key attributes for retaining and attracting residents who wish to establish roots and raise families.

5.2 Discourage speculative and investor-oriented housing options

By prioritizing larger units, the neighbourhood can proactively address the risk of rapid intensification leading to investor-driven, transient occupancy patterns including timeshare, which often erode community cohesion and stability.

In addition to the swift transformation enabled by large, contiguous lots, our neighbourhood has also experienced **several stalled redevelopment projects** for many years—even decades—thereby limiting the availability of much-needed housing. While **we recognize that this challenge extends beyond our community and requires a city-wide approach**, it raises an important question: **if the City can implement a “Vacant Home Tax” to encourage occupancy, why not consider a “Vacant Lot Tax”** for sites where development fails to commence or conclude within a reasonable timeframe (say, for several months or years)? Such a policy could **incentivize timely development and help address the ongoing housing shortage**.

6. Traffic and parking concerns

6.1 Rush-hour traffic and stress on narrow middle lane

Bayview Ave. stands as the **sole North-South arterial route leading into Downtown Toronto** east of Yonge St., apart from the DVP. As a result, it attracts substantial rush hour traffic, often resulting in **vehicular queues stretching over 1 kilometer**. The **situation is further aggravated by the reduction in lanes from 6 to 4 lanes** (not including middle lanes), just north of Post Rd., which intensifies bottlenecks and prolongs congestion along this corridor.

The persistent vehicular queues place considerable strain on the narrow middle lane, particularly during left turns. Drivers are often forced to **make two-stage left turns** (left turn using the middle lane to wait for a clearance to complete left turn), **which leads to overlapping left-turning traffic and gridlock** sometimes —especially at intersections with closely positioned opposing streets or entrances, such as Country Lane and Arjay Crescent, as well as Junior Academy and CFC entrance (notable during events). With the planned addition of several midrise buildings along this stretch, the risk and severity of gridlock are expected to increase, **particularly in areas where midrise developments flank both sides of Bayview Ave.**

These conditions are **making it increasingly difficult and time-consuming for residents to navigate daily commutes**. The situation is **only expected to intensify as further midrise development increases population density and turning vehicle counts**.

6.2 Concerns of small, dead-end and circular streets accessible only from Bayview Ave.

The concerns discussed here may be most pronounced on short, dead-end or circular streets, where the increased density will be most significantly noticeable, with the lack of alternative connections significantly exacerbating traffic congestion and reducing overall neighbourhood accessibility. However, while it would be useful to appreciate these concerns from the perspective of small, dead-end or circular streets, several of these concerns **apply to other streets as well to varying degrees** – as they are associated with having midrise buildings at their entrance or exit from a major street.

Another distinctive feature of the Central Bayview Ave is that **a significant portion of the roadways in the southern half of this segment of Bayview Avenue (up to York Mills Road), as well as several streets to the north, are configured as dead-ends or circular routes that connect exclusively to Bayview Ave.**

6.2.1 Potential displacement of established neighbourhoods

The principle behind gentle intensification is to introduce new housing in low-density neighbourhoods without altering their intrinsic character. However, this objective faces significant obstacles on these streets. For instance, **consider the impact on the quality of life (QoL) for residents of a dead-end street**

with just 20 homes if a 100-unit midrise building is constructed at the entrance—such a dramatic increase in density can fundamentally alter the street's character, increase traffic, and strain local infrastructure.

6.2.2 Overflow parking at the entrances of dead-end street restricting Access



Parking on The Bridle Path by congregants of a religious place of worship on Bayview Ave.



Parking on Country Lane by congregants of the same religious place of worship on Bayview Ave. The delivery truck was unable to turn into the driveway, thus blocking thoroughfare, resulting in a long vehicular queue (not shown here, although a video is available) resulting in a call to 9-1-1.

Under the City of Toronto's EHON Major Streets guidelines and recent zoning amendments, for **resident parking**, mid-rise buildings have **no minimum parking requirement**, but a **maximum of 1.0 space per dwelling unit**. For **visitor parking**, the standard minimum rate for mid-rise building is **1.0 space if there are 60 or fewer units**; or, **2.0 spaces plus 0.01 per unit** (or 0.1 to 0.2 per unit in other zones).

The side streets in this neighbourhood currently have no parking signage or parking restriction. This means that a midrise building on a major street will have almost all visitor parking, especially during events, parties, or peak periods, spill onto these narrow side streets. Our lived experience shows that **visitors often park on both sides of these streets** to shorten their walk to their building on Bayview Ave., **further constricting already tight access**. In winter, snowbanks exacerbate this problem, **sometimes making it nearly impossible for larger emergency vehicles or fire trucks to get through, which poses serious public safety risks**.

For example, recurring and excessive parking related to a religious institution on Bayview Ave. led to the introduction of a “No Stopping” rule on one side of The Bridle Path. Despite this measure, **approximately 150 parking tickets were issued over the course of a year, highlighting the persistent nature of the problem despite strict parking restrictions in place**.

The community is particularly concerned that, **as one of the first neighbourhoods facing significant and rapid midrise redevelopment, any lessons learned from this approach— of reducing parking space requirements for midrise buildings to encourage less car ownership and use—will come too late to correct or mitigate adverse impacts**. If policies prove ineffective, residents may face ongoing parking shortages and related issues with no immediate recourse.

Additionally, during construction phases, **the entrances to these side streets are at risk of severe congestion as delivery and construction vehicles** will be rerouted from Bayview Ave. into the neighbourhood, further straining local mobility and access.

6.2.3 Traffic management and safety concerns

All non-residential vehicles using dead-end streets must eventually make U-turns on these narrow roads, and it is common for drivers to use private driveways to do so. This creates additional inconvenience and potential safety hazards for residents.

Importantly, all traffic from these single-access streets must ultimately use Bayview Ave. for entry and exit. As a result, **neither in-block nor corner developments**, with access from Bayview Ave. or side street resp., **decrease or divert traffic from Bayview Ave.**, and each contribute to congestion on this already busy arterial route.

These challenges related to traffic and parking are **further exacerbated** if a midrise building includes an **institution that generates substantial, short-duration traffic surges** — such as a **school** during pick-up and drop-off times, a **large office building** during rush hours, or a **place of worship** during holidays. In such cases, the compounded impact on street access, parking availability, and overall neighbourhood safety is even more pronounced.

6.2.4 Resident Parking Space Concerns

TTS Guide	Vehicles/household
2006	1.91
2011	2.1
2016	2.39
2022	2.66*

Disclaimer: This data is for TTS Zones 226 and 227 only. *Data for TTS Guide 2022 is a simple projection.

Ideally, we should have TTS Zone 229 and 230 data as well. However, we do not have access to these guides currently.

At present, vehicle ownership in this neighbourhood remains high, averaging 2.66 vehicles per household*. **If the vehicle ownership pattern persists despite the policy to discourage it by limiting parking spaces, there is a significant risk that parking allocations for residents fall well short of actual needs resulting in overflow parking on the street, much like the visitor parking.**

Such a shortfall could result in chronic spillover parking onto adjacent side streets, impeding emergency vehicle access and worsening congestion, **it is therefore essential to undertake comprehensive, evidence-based modelling that considers not only the most optimistic projections but a range of plausible scenarios**—including those where vehicle ownership remains unchanged or even rises due to delays in viable options of public transit enhancements to keep up with the increase in population density. Only by examining these varied outcomes can we ensure that future parking needs for both residents and the wider community are responsibly planned for, and that unintended negative impacts are mitigated.

6.3 NY27.15 - Bayview Avenue Traffic Review

The City has initiated the “NY27.15 - Bayview Avenue Traffic Review,” focusing on the most congested portion of the Bayview Ave. segment (from Post Rd. to York Mills Rd.) which forms a southern portion of Bayview Ave. segment under consideration in this Position Statement. However, we strongly recommend that **the scope of this traffic review be expanded to encompass the northern segment as well (from York Mills Rd. to Highway 401)**, where significant development pressures and traffic impacts are also anticipated. The **concern** remains that **it may be too late to apply some recommendations of this traffic review if the development applications are approved prior to the recommendations being available.**

It is important to note that, unless the study’s scope and timelines are aligned with current and upcoming development applications, there is a risk that key recommendations may be delivered too late—after major redevelopment approvals have already been granted. To proactively address congestion and avoid compounding existing traffic issues, **it is vital that the traffic review be broadened and expedited before further development proceeds. At best, if the review can not be completed urgently or the**

development applications delayed, the approvals should be conditional with the rider of pending this traffic review.

6.4 Review resident and visitor parking space requirement

At a minimum, parking provisions should fully comply with the maximums defined under the current municipal bylaws; however, ideally, the number of parking spaces should be increased to meet or exceed the prevailing neighbourhood average.

It is essential that **parking requirements be explicitly incorporated into the upcoming traffic review for this neighbourhood**, ensuring that supply is maximized—particularly on small, dead-end and circular streets where on-street parking capacity is especially constrained. This proactive approach will help address both current and anticipated parking needs and support overall community accessibility and livability.

6.5 Prohibit parking on at least one side at the entrance of side streets

Establish no-parking and, ideally, or no-standing zones as per our experience on The Bridle Path, on one side of the side-streets—at minimum, near the midrise i.e. at the entrance points of the streets, say, for the initial 100 meters—to facilitate emergency vehicle access, maintain traffic flow, and ensure pedestrian safety.

7. Environmental concerns

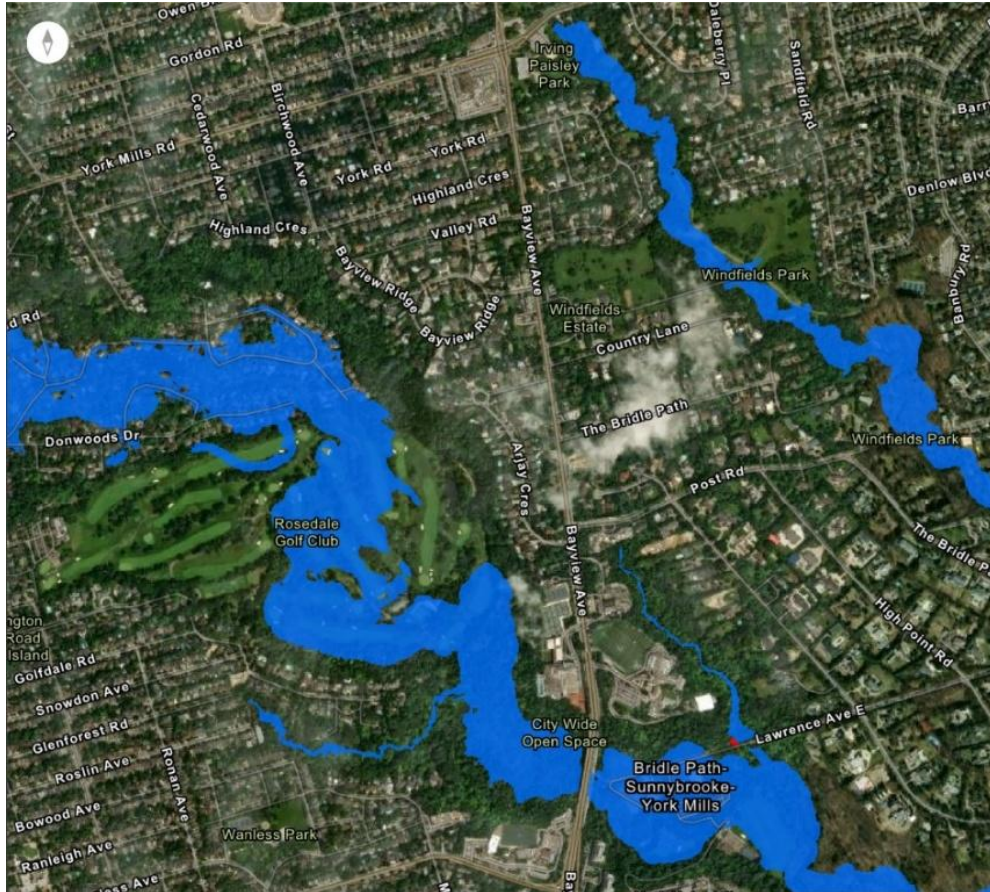
7.1 Loss of Tree Canopy and Water damage concerns

The ongoing and anticipated wave of midrise building development along the Central Bayview Ave., adhering to minimalist setbacks, is leading to substantial increases in hardscaped surfaces, such as paved parking lots, sidewalks, driveways, and the buildings footprints. This **expansion of impermeable surfaces** often requires the removal of existing green areas, including mature trees and vegetated spaces, to accommodate larger building footprints and underground parking structures. As a result, a **marked reduction of the tree canopy** along Central Bayview Ave. lots is expected.

The elimination of trees not only **diminishes the aesthetic and ecological value** of the community but also exacerbates environmental challenges. The loss of root systems **reduces natural stormwater absorption, increasing the risk of water run-off and potential flooding.**

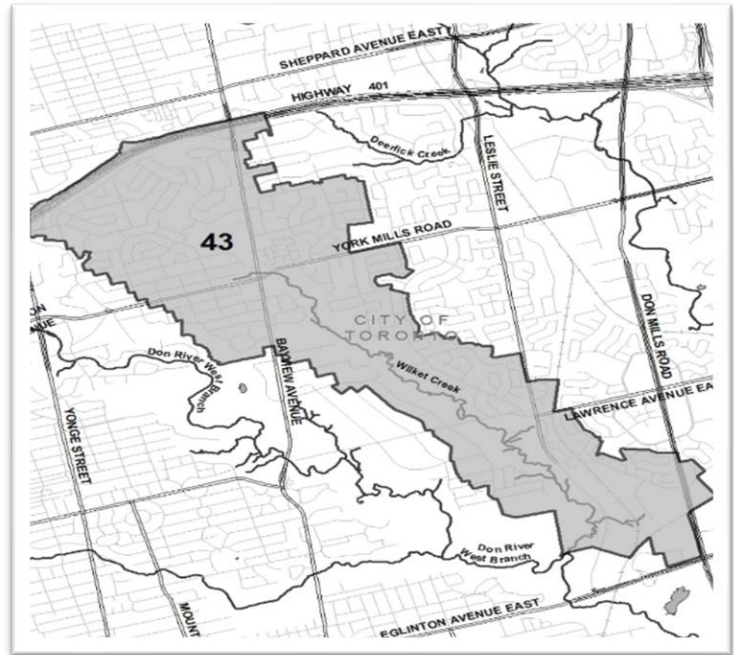
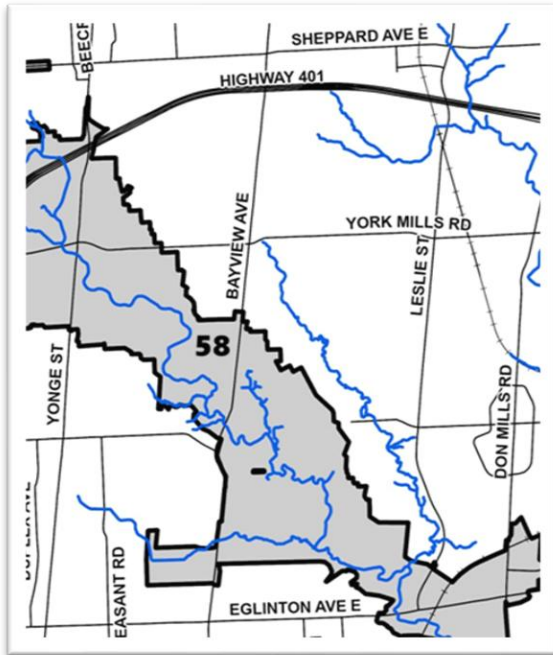
Many of the side streets along Central Bayview Ave. feature **culverts that are either poorly maintained or potentially too small to handle the drainage** needs associated with an increased number of midrise buildings. This concern is especially relevant in areas bordering floodplains, where robust rainwater and snowmelt drainage systems may be absent or inadequate. The construction of extensive underground parking structures, **especially multistorey underground parking** as submitted in a recent redevelopment

applications, spanning a substantial length of Central Bayview Ave.—particularly in a **corridor flanked by floodplains**—raises serious questions about the capacity of existing infrastructure to manage stormwater and prevent flooding. **A comprehensive assessment of drainage requirements and flood risk is crucial before proceeding with large-scale midrise development in this area.**



Flood planes run around Central Bayview Ave., within meters to half a kilometer

It is no wonder then that the two flood plains lead to two flooding areas along the Central Bayview Ave. corridor



Basement Flooding Study Area 58 (southwest of Area 43) and 43 (northeast of Area 58) respectively run through Bayview Corridor

Area 43 and 58 are officially designated Basement Flooding Study Areas—where repeated storm-related flooding has been documented.

The City has completed a thorough Environmental Assessment for Area 43 and is now advancing significant sewer upgrades, enhancing overland drainage, and investing in long-term infrastructure to help mitigate basement flooding risks.

According to the City’s assessment, the primary factors contributing to flooding include:

- Storm sewers overwhelmed during heavy rainfall
- Overland flow channels directing water toward low-lying properties
- Aging infrastructure that was not built for current storm intensities
- Close proximity to Wilket Creek, which can surge during storms

Next steps include **detailed design and phased construction**, with implementation typically spanning several years based on funding and alignment with other infrastructure projects.

- Increasing the capacity of storm and sanitary sewers
- Installing new stormwater storage and relief sewers
- Enhancing overland drainage systems
- Reconfiguring catch basins and adjusting road grading

7.1.1 Basement Flooding Study Area 43

The Area 43 study determined that the **existing sewer system is inadequate to manage wet weather events**, such as 50- or 100-year storms. The findings clearly show that, without upgrades, **sewer surcharging is inevitable**. Notably, the study did not factor in the impacts of intensification from midrise apartment developments. As a result, **the current infrastructure which is already inadequate would be unable to accommodate the increased sanitation and stormwater flows generated by rapid growth and densification from midrise apartments**.

During its modelling process, the Area 43 study's authors consulted with the Toronto Region Conservation Authority (TRCA), given that many homes in Area 43 are located within TRCA's Regulated Area. Any future development on or adjacent to Regulated Areas must undergo TRCA review. However, **a jurisdictional gap exists for developments situated near—but not directly within—Regulated Areas, which can still trigger downstream impacts within these sensitive zones**.

7.1.2 Basement Flooding Study Area 58



Area 58 **surface ponding, submerging sidewalk**,
photographed on March 19th, 2026

This stretch of Area 58 fronts very low-density neighborhoods and a Don River valley edge, making the risk profile atypically sensitive for mid-rise transitions. This block is engineered as a **flood-relief corridor, not a growth corridor**. **Adding density at the very point the model treats as a residual weak spot undermines the City's own stormwater strategy**.

The **Arjay–Post trunk is a primary regional route** for upstream catchments, not a routine local drain. Area 58 modelling identifies the outlet near Post Road and south of Arjay Crescent as a sanitary surcharge hotspot, where **historical storm data (2000, 2005, 2013) shows water levels rising into or near basement ranges**. This segment is a known **surface ponding** location where **reverse-slope driveways already exceed City depth criteria** during major storms.

The Environmental Assessment (EA) **recommends a very large 4.2m x 2.1m concrete box culvert (254m long and up to 7m deep) plus high-capacity sewers** to correct existing deficiencies.

The area is a hydraulically constrained outlet; **adding mid-rise density** increases hardscape and storm inflows, **potentially pushing the system further below City standards**. **Intensive mid-rise development would complicate construction staging**, limit future capacity for upsizing, and heighten safety risks for new residents in a known flood-prone area. It is **premature and unsafe to grant mid-rise permissions** until the upgraded drainage system is fully constructed and its performance verified under real-world storm conditions.

7.1.3 Criteria 2 Moratorium Pending Infrastructure Upgrades

Under Table 7 of the City's Wet Weather Flow Management Guidelines (WWFMG), a Criteria 2 exemption allows a developer to connect to a sewer/stormwater system when it cannot meet the standards of the WWFMG. Multiple applicants are using a Criteria 2 exemption as a routine design approach rather than a constrained last resort.

If Development Review's site-by-site review of Criteria 2 requests does not account for the aggregate number of exemptions potentially being granted, the cumulative effect is to allow each developer to individually point to the system's remaining residual capacity, while the collective of approved projects exhaust all sewer capacity. Criteria 2 exemptions should be paused until Area 43 and Area 58 upgrades are implemented and tested.

7.1.4 Climate Change considerations

In 2024, the Toronto and Region Conservation Authority (TRCA) prepared Toronto's *Current and Future Climate Report* (TCFCR) that delivered a comprehensive scientific assessment of how Toronto's climate has changed and predictions for the remainder of the century. At the core of its findings is that "Toronto's climate is getting warmer, wetter, and wilder".

In the past 20 years, the TCFCR has noted that Toronto has had four 100-year storms. The inference from this occurrence is that the 100-year storm standard used by City guidelines is statistically outdated. The report explicitly states: "it is no longer sufficient to rely solely on historical climate data and trends". The current standard that allows new development to connect to storm/sanitary systems may not be adequate to reflect the risk of flooding or surcharging.

More importantly, the TCFCR notes that precipitation and extreme storms are increasing. Annual total precipitation is projected to increase by 18% to 27% by the end of the century. More rain is anticipated to fall over very short periods (within minutes to 24 hours) directly increasing the risk of flash flooding and sewer surcharge.

The Sewer Capacity Assessment Guidelines (SCAG) predate the TCFCR. Assessment using SCAG may be underestimating the future impact on the City's Basement Flooding Protection Program objectives. It is the YMRA's position that any Criteria 2 exemption based on perhaps outdated guidelines would fail to reflect the best available science, a requirement under the Provincial Planning Statement 2024.

7.1.5 Minimizing environmental impact of underground parking

The large lots should not be exploited to maximize profitability of the developers and increasing FSI alone. As we have already seen with some recent development applications, there will be temptation to build property-line to property-line underground parking and even multistorey underground parking. This has direct environmental impact by decreasing soil volumes required to plant mature trees and water runoffs. **Mature trees should be planted in the setbacks** and new developments must **stay above ground water level (MAGWL)**.

7.1.6 Minimizing impact to trees

One of the defining characteristics of this neighbourhood, which is one of the oldest neighbourhoods in the city, is the presence of mature trees. Each development will require removing or damaging a vast number of these mature trees. It is critical that developers move beyond simply meeting the minimum tree planting requirements set out in the Toronto Green Standards. Instead, all development proposals should be required to **maximize the plantation of large-growing native tree species**, with the explicit goal of restoring and strengthening the existing canopy coverage. This includes **prioritizing the retention of healthy mature trees** during construction, integrating **generous green setbacks**, and **ensuring adequate soil volumes** to support mature tree growth.

Parkland dedications offer an important opportunity to further increase local tree cover and improve carbon sequestration while safeguarding the long-term neighbourhood character for future generations. Active collaboration with the local community can help identify priority locations for new tree plantings and parkland expansion, ensuring that efforts to enhance the urban forest directly reflect local values and needs.

7.1.7 Keeping midrise driveways short

To reduce the environmental impact of new development, **the driveway leading to underground parking should be positioned as close as possible to the access road. This approach limits the extent of hardscaped surfaces**, lowers carbon emissions associated with construction as well as driving, and preserves more space at ground level for landscaping and plantation. By maximizing the area available

for green setbacks and vegetation, developers can help restore the tree canopy and support stormwater management, enhancing both ecological and aesthetic value within the neighbourhood.

7.2 Lack of Park Space

The significant and rapid midrise development along Central Bayview Ave., as noted and as expected, must have provision for accessible parkland within the neighbourhood. Parkland serves as vital green space for residents, providing opportunities for recreation, relaxation, and social connection, while also supporting the physical and mental well-being of both adults and children. **The influx of new residents—particularly families—further strains the already limited park spaces, many of which are frequently at or over capacity and are often too scattered or distant to be easily accessible** for, especially, children and seniors. To ensure equitable access for all, **a public park should be available within a 500–750 meter walking distance** from every residence, reflecting best urban planning practices and the needs of families, children, and seniors alike. This proximity is critical for fostering community health, encouraging regular outdoor activity, and supporting the social integration of new residents within the neighbourhood.

Accepting cash in-lieu of parkland dedication may seem like an expedient solution but it does not address the core issue of the lack of usable parkland within walking distance for the community. Financial contributions cannot replace the **tangible benefits of local parks, such as improved air quality, natural stormwater management, outdoor activity, social interactions —particularly children and seniors— which are essential for physical health and combating chronic illnesses**. The absence of parklands exacerbates loss of tree canopy and increases the risk of flooding due to reduced natural water absorption. In fact, **relying on cash-in-lieu payments for developments early on and only realizing the need for park space as it arises with increased population density will result in delayed or inadequate expansion of parkland**, further compounding the deficit as development outpaces the City's ability to acquire and establish new parklands.

7.2.1 Planning for local park spaces within the neighbourhood

Parkland dedication should be implemented locally to best support neighbourhood character and address parkland needs of this neighbourhood, **where such extensive development and significant population increase is expected**.

All effort should be made to **find innovative solutions** towards this end. One suggestion of the community is that the cash-in-lieu of amount must reflect the real estate value within the community and should be pooled with other such contributions to the purchase of land for new park spaces within the community. By pooling these contributions, the City can proactively secure and preserve local green space. Furthermore, the local community should be actively engaged as partners—serving as the “eyes and ears” to identify potential acquisition opportunities and advise on the suitability of available parcels

for parkland dedication. This collaborative approach ensures investments directly benefit the community and help maintain its parks.

7.3 Incorporating additional environmental considerations at marginal cost

Considering the upscale nature of this neighbourhood and the cost of real estate and redevelopment involved, it would be useful to build some additional environmental goals in the application approval as the **incremental cost of these measures will be relatively small** compared to the overall. Such measures may include reduction of carbon footprint by utilizing **geothermal energy, and rainwater harvesting** which gains particular relevance given the level hardscaping expected from these developments.

8. Privacy & Noise concerns

It is regrettable that the recent amendments including Updated Rear Transition Performance Standards do not require rear step backs below 6 storeys. This would have provided some scale transition and reduce the visual impact of taller buildings on neighbouring backyards and amenity spaces, given the removal of 45-degree of angular planes on the rear. Given the anticipated volume of midrise development and the presence of large lots along the Central Bayview Ave. corridor, it is feasible to implement rear stepbacks below six storeys or to introduce rear angular planes while still supporting a high level of density within the neighbourhood. Nevertheless, there is a lack of clarity regarding the City's specific density objectives for the Central Bayview Corridor and the extent to which local infrastructure can accommodate such intensification. This uncertainty makes it difficult to determine the most appropriate built form and planning approach for the area.

To protect the privacy of adjacent properties, **green roofs should be located exclusively along the major street-facing portion of the building, i.e. Bayview Ave., and remain unoccupiable, with no amenity space permitted.** This restriction prevents direct sightlines and noise intrusion into neighbouring yards and bedrooms, safeguarding the quiet enjoyment of existing homes while supporting urban greening, stormwater management, and improved streetscape aesthetics.

To minimize disruption to existing residents, **all amenity spaces** —including outdoor gathering areas, patios, playgrounds and green roofs— **should also be oriented towards the street frontage** (i.e. Bayview Ave) rather than the rear or side yards. This design approach ensures communal and recreational uses are directed away from private backyards and neighbouring properties, significantly reducing noise transfer and protecting privacy. Additionally, **street-oriented amenity spaces enhance urban vibrancy, improve public realm interactions, and support safer, more welcoming streetscapes**, while ensuring that new developments remain compatible with the established residential environment.

9. Commercial use considerations

Given the existing parking and rush hour traffic concerns within the neighbourhood, it is essential to carefully regulate the types of commercial uses permitted in new developments. In particular, **establishments that significantly increase traffic during short durations—such as schools and large daycare centres during drop-off and pick-ups; places of worship during holidays; and, large office buildings and other rush hour traffic generators—should not be allowed.** Instead, any commercial activities should be limited to those with minimal impact on traffic flow and local safety, such as small-scale retail, or neighbourhood-serving services that do not attract large

volumes of vehicles. By restricting high-impact commercial uses, the community can maintain a safe, accessible, and tranquil environment, while ensuring that new development remains compatible with established residential patterns and supports the overall well-being of residents.

10. Heritage site considerations

Midrise development along Central Bayview Avenue should recognize and conserve buildings and landscapes that have cultural heritage value. A block plan should conserve the broader physical and contextual attributes that contribute to the identity of the neighbourhood.

10.1 Conserving heritage resources

Development applications should identify any heritage properties (i.e. the Windfields Estate) that are designated under Part IV or Part V of the Ontario Heritage Act on or adjacent to the site. A Heritage Impact Assessment (HIA) must be provided to evaluate potential effects and recommend conservation measures.

10.2 Heritage-sensitive design

Developments adjacent to heritage sites should conserve and reinforce the heritage character of the area using appropriate setbacks, stepbacks, and height transitions. Careful attention should be made to minimize impacts on mature trees, views, and established frontage patterns.

11. Golden Mile precedent

The Golden Mile Secondary Plan is one of Toronto's clearest examples of what may happen when applications to increase density outpace the infrastructure capacity needed to support it. Historically a car-oriented commercial strip, the Golden Mile saw rapid residential intensification applications with block plans without the parks, schools, community facilities, or mobility infrastructure required for complete communities. The Secondary Plan was introduced to address these gaps. Here are some of the key lessons learned the Golden Mile experience:

11.1 Infrastructure must be secured before density—not after.

The Golden Mile Secondary Plan links development approvals to the delivery of parks, schools, childcare, and community facilities. This corrects earlier failures where thousands of residents arrived before basic services were planned or funded. **Livability cannot be retrofitted once towers are built.**

11.2 Built form must be coordinated at a district scale.

Before the Secondary Plan, isolated applications created abrupt height changes, shadow impacts, and inconsistent transitions to neighbourhoods. The plan introduced corridor-wide height limits, angular

planes, and stepbacks to prevent cumulative negative impacts. **Without a shared framework, intensification becomes fragmented and unpredictable.**

11.3 Mobility infrastructure must match the scale of growth.

The plan recognizes that reduced parking ratios alone do not create transit-oriented communities. It requires complete streets, safer intersections, cycling networks, and a walkable public realm. **Density without mobility infrastructure leads to congestion, unsafe streets, and poor access to transit.**

11.4 The Holding (“H”) provision is essential for sequencing growth.

A key implementation tool in the Golden Mile is the use of the holding (“H”) provision under the Ontario Planning Act. This mechanism allows the City to pause development until essential infrastructure—servicing, transportation improvements, parks, community facilities, or other requirements—is secured.

This ensures growth happens in step with infrastructure—not ahead of it. The holding provision ensures that:

- development does not outpace infrastructure
- phasing is tied to real, measurable conditions
- growth occurs in a coordinated, infrastructure-led manner

12. Conclusion

The lessons from the Golden Mile Secondary Plan underline the critical importance of aligning growth with infrastructure delivery, coordinated built form, and robust mobility improvements. Past experiences have shown that fragmented intensification—where development outpaces the provision of schools, parks, transit, and community facilities—leads to service gaps, unsafe streets, congestion, and diminished quality of life. **Once density is approved and built, the opportunity to secure land and resources for essential amenities is often lost, resulting in costly, long-term challenges for communities.**

The holding (“H”) provision, as implemented in the Golden Mile, serves as a vital mechanism to ensure that growth happens in step with infrastructure along the Central Bayview Corridor as well.

The H provision should be explicitly tied to:

- Completion of the NY27.15 – Bayview Avenue Traffic Review and the implementation of its recommendations
- Completion and verification of the City’s Basement Flooding Protection Program in Areas 43 and 58, with a clear requirement of “no net increases” in peak sanitary and storm flows during wet weather events,

- Corridor-wide infrastructure capacity confirmation for all utilities (including but limited to water, hydro, telecom) for full build-out, not individual sites.

By tying development to measurable conditions—such as the completion of servicing, transportation improvements, parks, and community facilities—the City can prevent piecemeal growth and ensure a coordinated, infrastructure-led approach. This strategy not only mitigates negative impacts but also fosters vibrant, transit-oriented, and livable neighbourhoods.

Growth must be planned, not piecemeal. Only through a sequenced, coordinated, and infrastructure-supported approach can the City ensure that intensification enhances, rather than undermines, the livability and sustainability of our communities.