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**DELIVERED BY EMAIL**

[nycc@toronto.ca]

North York Community Council  
c/o Matthew Green  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Committee Members:

**Re: NYCC April 29, 2026 Meeting  
Agenda Item NY32.2  
8 Parmbelle Crescent, Toronto  
Letter of Opposition**

We are legal counsel to Stephen and Wendy Cole, the long-time residents and owners of 12 Barnwood Court, Toronto. The Coles' home is located immediately to the south of 8 Parmbelle Crescent, Toronto ("**Property**") and will be adversely affected by the proposed redevelopment of this Property as contemplated by the subject application.

We write to express our clients' opposition to the proposed zoning by-law amendment that would facilitate the redevelopment of 8 Parmbelle Crescent with four, 3-storey freehold townhouses ("**Application**").

We agree with the recommendation contained in the April 13, 2026 staff report from the Director, Community Planning, North York District. This Application does not conform with the City of Toronto Official Plan and should be refused.

In support of our clients' position, we enclose:

1. A planning opinion from Michael Manett, MCIP, RPP dated April 24, 2026, which provides a detailed rationale that demonstrates how the Application does not have regard for matters of provincial interest set out in s. 2 of the *Planning Act*, is not consistent with the Provincial Planning Statement, 2024 and does not conform with the City of Toronto Official Plan.

2. A peer review from Ashish Shukla, P. Eng., of C.F. Crozier & Associates Inc. of the Functional Servicing and Stormwater Management Report submitted with the Application, which identifies technical deficiencies with the report and the need for a hydrogeological report.

Both the planning opinion and engineering peer review contain a brief summary at the outset of the respective reports. These reports identify fundamental concerns with the Application that justify its refusal.

### **The Proposal to Subdivide the Property is Fatal to the Application**

While there are numerous reasons to refuse the Application, the proposal to subdivide the Property into four, individual lots is a fundamental, and fatal, flaw associated with the Application.

Policy 4.1.5 of the Toronto Official Plan requires that development in established Neighbourhoods respect and reinforce the existing physical character of each geographic neighbourhood, including lot sizes and configuration. The Application would drastically alter the existing pattern of lots sizes and configurations in the neighbourhood and, consequently, does not conform with the Toronto Official Plan.

The ironic consequence of the proposed subdivision of the Property is that it could very well discourage intensification over the long term and frustrate the delivery of gentle density in established Neighbourhoods.

Jason Thorne, the City's Chief Planner, expressed similar concerns in a November 21, 2025 submission regarding the Province's proposal to reduce minimum lot sizes in urban areas. Mr. Thorne described the concern succinctly in the following passage:

*...the proposal to reduce or remove minimum lot size requirements in low-density urban residential areas may have the unintentional effect of frustrating future intensification, by enabling the severance of large lots into multiple small lots that are only able to accommodate a small, single-unit house.*

A copy of Mr. Thorne's November 21, 2025 correspondence is enclosed.

### **Conclusion**

It is plain and obvious that the Application does not conform with the Toronto Official Plan. Consequently, the Application should be refused.

Given the extent of non-conformity there is no benefit to deferring the Application to allow the owner to submit a revised proposal or additional supporting materials such as a hydrogeological study (which City staff noted was required and was not submitted). No amount of revision or additional study will bring the Application into conformity with the Official Plan. As such, we respectfully ask the Committee to adopt City staff's recommendations that the Application be refused.

We will attend at the Committee meeting on April 29, 2026 to make a brief deputation and answer any questions the Committee might have.

Yours truly,



Lee English

cc Stephen and Wendy Cole  
Mina Rahimi, Mina.Rahimi@toronto.ca  
Michael Manett, MPLAN Inc.  
Ashish Shukla, C.F. Crozier & Associates Inc.

Encl.

City Planning

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November 21, 2025

Provincial Planning Branch  
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PlanningConsultation@ontario.ca

**RE: Consultation on Minimum Lot Sizes (ERO 025-1100)**

On behalf of the City of Toronto, I am pleased to submit the City Planning Division's comments on the consultation on minimum lot sizes.

City Planning staff understand that government is seeking public feedback on proposed legislative and regulatory changes under the Fighting Delays, *Building Faster Act, 2025* to streamline the construction of new homes and infrastructure (e.g., water, wastewater, roads, transit), reduce gridlock, enhance community safety, and improve landlord-tenant frameworks. In addition, staff understand that in connection with this Bill, the government is consulting to better understand the linkages between setting minimum lot size requirements on urban residential lands and increased housing options, improved affordability, and expanded access to homeownership across Ontario.

The City of Toronto supports the general intent of the Province to encourage gentle density, increase housing supply, broaden housing options and encourage home ownership to contribute to meeting the Province's goal of building 1.5 million homes. However, the proposal to reduce or remove minimum lot size requirements in low-density urban residential areas may have the unintentional effect of frustrating future intensification, by enabling the severance of large lots into multiple small lots that are only able to accommodate a small, single-unit house. While a severance may allow an individual builder, in the short term, to construct a small single-family home, reduced lot sizes in the longer term may create a barrier to more significant intensification, such as multiplexes and small-scale apartment buildings. This intensification is supported through many of the City's recent Official Plan and Zoning By-law updates.

Toronto's recent multiplex permissions, in combination with ARU permissions, permit up to 5 units on most residential lots across the City, and up to 7 units on lots in the downtown area. From the perspective of planning for intensification through missing middle housing

types, it is preferable to retain larger parcels that are capable of more easily accommodating multi-unit residential development in the form of multiplexes and small apartment buildings.

Larger parcels make it easier for property owners to take advantage of Toronto's permissive new zoning to build multiple units in the form of a multiplex. For example, many of the multiplex designs in CMHC's National Housing Catalogue will not fit on a lot less than 10 metres in width. These building types have much greater potential to deliver residential units than single-unit houses. Similarly, as-of-right zoning permissions in Toronto for small apartment buildings on the city's major streets are generally premised on assembling two 12-metre-wide lots that are typical in many of Toronto's suburban neighbourhoods. If the Province does choose to impose minimum lot size requirements, they should be sufficient to accommodate these types of intensification, otherwise a provincial regulatory framework that enables severances may reduce land readily available for multi-unit residential development.

Toronto's experience has particularly highlighted the importance of adequate lot frontage to accommodating upgraded utility infrastructure required for multi-unit buildings, such as hydro transformers, and to providing for emergency access to garden suites and other units through side yards.

If the Province's objective is to create more ownership opportunities in the form of small, relatively affordable homes, then it could consider ways to leverage Toronto's and Ontario's growing stock of multiplex buildings to achieve more home ownership opportunities. This likely requires an alternative approach to condominium registration as a means to establish ownership tenure. Condominium corporations require cost and effort to register and operate, which may exceed the means of a multiplex building or other small apartment building. Provincial legislation may be needed to establish an ownership tenure model that is simpler to establish and operate.

The City recently monitored take-up of the multiplex zoning permissions adopted by Council in 2023. The study identified the condominium approval process and associated costs, and the challenges of operating a condominium corporation, as a barrier to small-scale condominium projects. Feedback from the public has suggested a need for template legal agreements and other documents to reduce costs and complexity in the condominium process for small scale housing types, including multiplexes, small apartments and garden and laneway suites. A common comment is that Ontario should look at the British Columbia model of strata property.

## **Conclusion**

Reducing or removing minimum lot size may discourage intensification over the long term and frustrate the delivery of gentle density. More impactful solutions to increase housing options, improve affordability, and expand access to homeownership across Ontario may

include changes to legislation to enable strata for small-scale residential development. Several factors outside of minimum lot sizes also influence the implementation and uptake of gentle density, increased housing supply and home ownership including interest rates, ability to obtain financing, cost of materials and labour, and Condominium Act barriers.

Staff recommend providing a longer commenting period on any proposed regulation, and that the Province undertake analysis of the implications of any changes on facilitating more significant intensification in residential areas through building forms such as multiplexes and small-scale apartments.

Should you have any question regarding the City's submission or would like to arrange a meeting with City Staff, please contact me directly or Caroline Samuel, Manager, Zoning Section, City Planning Division ([Caroline.Samuel@toronto.ca](mailto:Caroline.Samuel@toronto.ca); 416-392-8781).

Sincerely,



Jason Thorne, MCIP, RPP  
Chief Planner and Executive Director  
City Planning



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## **PLANNING OPINION LETTER REGARDING ZONING BY-LAW AMENDMENT 25211052NNY16OZ – 8 PARMBELLE CRESCENT**

### **EXECUTIVE SUMMARY**

The property known as 8 Parmbelle Crescent was created in 1959 and has contained a single storey detached dwelling since the establishment of the subdivision. Single storey detached dwellings make up 100% of the built form in this neighbourhood. The current owner has applied for an amendment to Zoning By-Law 569-2013 in order to permit a four-unit freehold townhouse development on the site.

A townhouse form of development does not respect and reinforce the physical character of the neighbourhood since:

- the resulting lot sizes and frontages are undersized and smaller than any other lots in the neighbourhood;
- the townhouse development will result in a significant loss of front yard soft landscaping on the site;
- there will be a significant change to the character of the streetscape with the introduction of the townhouse development;
- a townhouse development, especially one located deep within a neighbourhood, is more disruptive to the physical character of a neighbourhood than a multiplex development; and
- a townhouse use is not permitted under the applicable RD Zone and the city has determined that it is not an appropriate form of development in an RD

Zone. That is why townhouse developments are directed to areas zoned RT and other more intensive zones.

In summary, it is my opinion that the proposed development is not appropriate as it is out of context with and does not respect and reinforce the physical character of the established Neighbourhood. Therefore, the proposed Zoning By-law Amendment does not conform to the Official Plan, does not represent “good planning” and should not be approved.

## **INTRODUCTION**

MPLAN Inc. was retained by Stephen Cole, the owner of 12 Barnwood Court, to provide a professional planning opinion based on an analysis of the documents submitted to the City of Toronto for Application 25211052NNY16OZ, a four-unit freehold townhouse development at 8 Parmbelle Crescent and to determine if the application was appropriate for the property within the context of this low density, single detached Neighbourhood. The property at 8 Parmbelle Crescent immediately abuts 12 Barnwood Court along its southern boundary. This analysis will include a review of relevant provincial and city policies and regulations, and the appropriateness of the proposed development based upon the applicable policies, regulations and represents and determine if the subject development would represent “good planning”.

The 8 Parmbelle Crescent property dates back to 1959 and a single storey detached dwelling has been on the site since that time. The subject application proposes an amendment to Zoning By-Law 569-2013 in order to permit a four-unit freehold townhouse development on the site, which is located at the interior or the neighbourhood.

Appendix 1 contains photos of the subject site and immediately adjacent properties to illustrate the context and streetscape related to the proposed townhouse development.

It should be noted that no Draft Plan of Subdivision or Consent Application has been

filed associated with the Zoning By-law Amendment Application, one of which will be required to facilitate the lot division contemplated by the ZBA application.

## **THE PROPOSED DEVELOPMENT**

The Applicant proposes to demolish the single storey dwelling and replace it with a four-unit freehold townhouse development. As noted, the proposed townhomes are intended to be freehold, requiring that the property be divided into four lots.

The proposed lot frontages range from 4.78m to 6.33m, with lot areas ranging from 288 sq.m. to 377 sq.m.

The Zoning By-Law Amendment and a subsequent Draft Plan of Subdivision or Consent Applications are inherently linked. If approved, the Zoning By-Law Amendment will permit the division of the lot as proposed. Therefore, in analyzing the proposed development, it is appropriate to consider Section 51(24) of the *Planning Act*, which sets out criteria that the proposed division of land must meet in order to be approved. An evaluation of the division of land, as proposed, is included in this Opinion Letter analyzing the Zoning By-Law Amendment Application.

It should also be noted that lot frontage, lot size and lot configuration are characteristics that must be considered when determining whether a proposed development “respects and reinforces” the physical character of a neighbourhood in accordance with policy 4.1.5 of the City of Toronto Official Plan.

## **NEIGHBOURHOOD ANALYSIS**

The subject property is located in the interior of an older suburban subdivision originally developed in the late 1950s to early 1970s. The neighbourhood (as noted in Figure 1) is made up entirely of single detached dwellings on relatively large lots. These existing dwellings in this neighbourhood are generally 1 to 2 storeys in height. In determining the “neighbourhood” for the purpose of analysis of applicable policies and regulations, we have used the existing physical land use features and homogeneity of lot sizes, streets and existing dwelling types to establish the relevant area along with the applicable

zoning (RD – Residential Detached).

Policy 4.1.5 of the City of Toronto Official Plan states that any development application on lands that are designated “Neighbourhoods” must respect and reinforce the existing neighbourhood’s physical character, especially in the immediate context surrounding the development. This physical character is determined by lot frontages, lots sizes, building setbacks and built form, including height and massing.

The Applicant’s planner, Martin Rendl Associates, in its Planning Rationale Report dated August 2025, provided an Area Context Photo (Figure 3) and a Geographic Neighbourhood map (Figure 619) for use in determining whether “the proposed residential development respects and reinforces the existing physical character of the Geographic Neighbourhood.” However, these figures do not clearly establish which properties are included in their analysis of neighbourhood character.

MPLAN has prepared a Neighbourhood Context Map showing the properties that we have included for use in our analysis of the physical character of the neighbourhood (Figure 1). It should be noted that our delineation of the immediate context of the development differs slightly from the delineation of the Applicant’s planner and is more specific to the properties included in order to carry out an analysis based on the City’s property data information.



Figure 1. Neighbourhood Context Map. The Immediate Neighbourhood Context has been Outlined in Red

Based on the property data obtained from the City, associated with Property Data Map 53M-23, there are 124 residential lots within the delineated Neighbourhood. Within this immediate context, the median lot area is 990.92 m<sup>2</sup>, with a maximum lot area of 2926.44 m<sup>2</sup> (6 & 8 Silverdale Crescent) and a minimum of 621.06 m<sup>2</sup> (11 Sandpiper Court). The median lot frontage in this area is 25.91 m, with a maximum of 70.13 m (11 Barnwood Court) and a minimum of 16.3 m (11 Sandpiper Court).

The proposed lot frontages and lot areas, since they are for townhouse units, are well below those found in the neighbourhood, which is entirely made up of single detached dwellings on relatively large lots, which represents the most important component of the physical character of this neighbourhood.

## **POLICY ANALYSIS**

### **PLANNING ACT**

As noted earlier, the current development application is only for the Zoning By-Law Amendment which does not provide for the division of the subject lot. If the Zoning By-

Law Amendment is approved, it will permit the creation of the four smaller lots that are totally out of character with the Neighbourhood and the provisions of the RD zone. The application is not to change the zoning to RT (Residential Townhouse Zone) but to amend the RD zone with regulations more appropriate for the RT zone.

Based on the proposed development, and notwithstanding that there is no associated Application for Draft Plan of Subdivision or Consent, it is still appropriate to consider the criteria that all divisions of land must satisfy under the *Planning Act*. These are contained in Section 51(24), included below:

*51(24) In considering a draft plan of subdivision, regard shall be had, among other matters, to the health, safety, convenience, accessibility for persons with disabilities and welfare of the present and future inhabitants of the municipality and to,*

*(a) the effect of the development of the proposed subdivision on matters of provincial interest as referred to in section 2;*

*(b) whether the proposed subdivision is premature or in the public interest;*

*(c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;*

*(d) the suitability of the land for the purposes for which it is to be subdivided;*

*(d.1) if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;*

*(e) the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;*

*(f) the dimensions and shapes of the proposed lots;*

*(g) the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;*

*(h) conservation of natural resources and flood control;*

*(i) the adequacy of utilities and municipal services;*

*(j) the adequacy of school sites;*

*(k) the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;*

*(l) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and*

*(m) the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act or subsection 114 (2) of the City of Toronto Act, 2006. 1994, c. 23, s. 30; 2001, c. 32, s. 31 (2); 2006, c. 23, s. 22 (3, 4); 2016, c. 25, Sched. 4, s. 8 (2).*

Of these 8 criteria, the most applicable are (a), (b), (c) and (f). These will be addressed sequentially below:

a) ***the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2***

Of the matters of provincial interest included in section 2, (h), (j), (p) and (r) are the relevant.

- (h) orderly development of safe and healthy communities: the proposed townhouse form of development does not provide for orderly development since it is a built form that would not be orderly, but disruptive and out of keeping with the existing neighbourhood;
- (j) the adequate provision of a full range of housing: this is a direction for the municipality as a whole and not related to the individual neighbourhood. A full range of housing does not mean that an inappropriate form of housing, as it relates to the specific character of this neighbourhood, would be appropriate to introduce to the area;

- (p) the appropriate location of growth and development: for this neighbourhood, based on its context and history of stability, suggests that appropriate growth and development should include upgrades and renovation of existing building stock and minor intensification based upon adding additional units to existing structures through multiplex uses and garden suites. This type of modest intensification would still require appropriate analysis and review on a site-specific basis. The Applicant's planner implies that a four-unit townhouse block and a four-unit multiplex are equivalent land use intensities, but this is not the case. A townhouse block is a more intense form of development than a multiplex, as noted in City staff reports, where staff agree with this interpretation. The subject site may be an appropriate location for a multiplex (subject to an appropriate analysis of an actual proposal), it is not an appropriate location for a four-unit townhouse block.
- (r) the promotion of built form that is well designed, encourages a sense of place and provides for public spaces that are of high quality, safe, accessible, attractive and vibrant. The proposed townhouse blocks do not encourage a sense of place, and in fact disrupt the established sense of place. The built form may be well designed for a townhouse project but is not appropriate for this location and clearly does not provide for public spaces that are of high quality, safe, accessible, attractive and vibrant.

b) ***whether the proposed subdivision is premature or in the public interest***

The proposed subdivision is not in the public interest since a townhouse built form is not appropriate for the area. Townhouses are a more intense form of development than multiplexes, and even if this form of housing was to be considered it would be more appropriate to locate at the periphery of an established neighbourhood, rather than deep into the heart of a homogeneous, stable, single detached residential area. This neighbourhood has no examples of any built form other than single detached dwellings.

***(c) Whether the plan conforms to the official plan and adjacent plans of subdivision, if any***

The proposed development does not conform to the City of Toronto Official Plan (to be detailed further in this letter) and based upon the proposed lotting does not conform to the plan of subdivision in which it is located or any adjacent subdivision plans.

***(d) The suitability of the land for the purposes for which it is to be subdivided***

While the physical characteristics of the land may technically be able to accommodate the proposed building structures, the location of the land is not suitable for its proposed purpose.

***(f) the dimensions and shapes of the proposed lots***

The dimensions and shapes of the proposed lots are inappropriate. The proposed lots are significantly undersized, in terms of both frontage and area, and totally out of character for this specific neighbourhood.

Given the above analysis, it is inappropriate to approve the proposed Zoning By-Law Amendment, because the subdivision of land required to facilitate the proposed development would not comply with section 51(24) of the *Planning Act*.

**PROVINCIAL PLANNING STATEMENT (PPS 2024)**

The *Planning Act* requires that the City's decision on planning matters, including the subject Zoning By-law Amendment Application must be consistent with PPS 2024. The PPS 2024 has many policies related to intensification (especially in proximity to transit) and providing for a variety of housing types within Settlement Areas (including the City of Toronto). The most important and relevant PPS 2024 policy indicates that municipal official plans are the most important vehicle for implementation of the PPS. Official Plans shall identify provincial interests and set out appropriate land use designations

and policies.

The proposed Zoning By-law Amendment Application is not consistent with the PPS as it does provide transit-supportive development and deviates significantly from the urban hierarchy set out in the City of Toronto Official Plan and does not conform with the Neighbourhood policies in the Official Plan.

## **CITY OF TORONTO OFFICIAL PLAN**

Applications for a Zoning By-Law Amendment must conform with the Official Plan. The subject property is designated Neighbourhoods on Land Use Map No. 19 of the City of Toronto Official Plan. The following Official Plan Policies are the most relevant in determining whether the proposal conforms with the Official Plan. Townhouses are a permitted form of residential development in Neighbourhoods according to the Official Plan. However, this site is not an appropriate location for a townhouse form of development and not every part of a designated Neighbourhood is required to accommodate every permitted residential use type. The policies and criteria of the Official Plan, as well as the applicable Zoning, are used to determine if a particular type of use, and associated application, are appropriate at a specific location within the Neighbourhood.

Policy 2.3.1 Healthy Neighbourhoods describes the expected role and function of neighbourhoods. Policy 2.3.1.1 states:

*Neighbourhoods are low rise and low-density residential areas that are considered to be physically stable. Development in Neighbourhoods will be consistent with this objective and will respect and reinforce the existing physical character of buildings, streetscapes and open space patterns in these areas.*

It is acknowledged that neighbourhoods are not frozen in time, and that gentle intensification is expected to proceed. However, new developments must respect and

reinforce the character of the neighbourhood at the time it is proposed. Conversely, physical character changes over time as development occurs.

This neighbourhood is dominated by single detached dwellings on large lots and has not undergone any redevelopment with the exception of upgrading and renovation to the original housing stock and replacement with more modern single detached dwellings. The proposed townhouse development, with the associated creation of undersized lots, would undermine the process of gentle intensification that is appropriate for very stable traditional neighbourhoods. The development proposed does not respect and reinforce the physical character of the Neighbourhood as it has existed for 60 plus years and would represent an undesirable built form and lotting pattern within this area.

Official Plan Policy 4.1.5, *Development Criteria in Neighbourhoods*, is applicable to the subject application and is the most important policy to consider in determining if the proposed Zoning By-Law Amendment is appropriate and conforms to the Official Plan. The applicable criteria are included in excerpt 4.1.5 below:

*Development in established Neighbourhoods will respect and reinforce the existing physical character of each geographic neighbourhood, including in particular:*

*a) patterns of streets, blocks and lanes, parks and public building sites;*

*b) prevailing size and configuration of lots;*

*c) prevailing heights, massing, scale, density and dwelling type of nearby residential properties;*

*d) prevailing building type(s);*

*e) prevailing location, design and elevations relative to the grade of driveways and garages;*

*f) prevailing setbacks of buildings from the street or streets;*

*g) prevailing patterns of rear and side yard setbacks and landscaped open space;*

*h) continuation of special landscape or built-form features that contribute to the unique physical character of the geographic neighbourhood; and*

*i) conservation of heritage buildings, structures and landscapes.*

Of these 9 criteria, (b) and (d) are the most applicable. As mentioned previously, within this immediate context, the smallest lot area and frontage are found at 11 Sandpiper Court, a lot which has an area of 621.06 m<sup>2</sup>, and a lot frontage of 16.3 m. The Applicant is proposing lot frontages as small as 4.77 m, and lot areas as small as 228.7m<sup>2</sup>. If the townhouse block were to be approved, it would result in lots that are significantly undersized in comparison to those in the remainder of the neighbourhood. Therefore, the proposed lots do not respect and reinforce the prevailing size of lots, both frontage and area. In addition, the neighbourhood is comprised entirely of single detached dwellings. This townhouse block would be the first non-single detached housing form to be built in this neighbourhood on a site deep within the neighbourhood rather than being constructed on its periphery (for example, along York Mills Road or the intersection of Laurentide Drive and Three Valleys Drive, which is discussed below). Unlike those locations, the subject property is not an appropriate location for a townhouse development that would see the existing lot fabric altered in an unacceptable manner. For these reasons, the proposed townhouse development does not respect and reinforce the physical character of the neighbourhood and does not conform to Official Plan policy 4.1.5.

In addition, Official Plan Policy 4.1.8 states:

*Zoning by-laws will contain numerical site standards for matters such as building type and height, density, lot sizes, lot depths, lot frontages, parking, building setbacks from lot lines, landscaped open space and any other performance standards to ensure that new development will be compatible with the physical character of established residential Neighbourhoods.*

The Zoning Bylaw Amendment proposes standards for townhouse use, which are permitted in the Residential Townhouse (RT) Zone. The application is not to change the zoning to RT, but rather to introduce a townhouse form of development into the RD zone, which is not a permitted use, by an exception. The planning justification provided by the applicant compares the proposed townhouse development standards to those in the RT Zone, which is not relevant if the use itself is not permitted. A townhouse is clearly not the prevailing building type in this neighbourhood and there are **no examples** of this type of building anywhere in this neighbourhood.

The significance of the departure from the existing zoning is shown in the following figure, which is an excerpt of the City's online zoning map for By-law 569-2013. It shows the subject property is located deep within the interior of the RD zone, while the nearest RA zone is on the other side of the Don Valley Parkway.

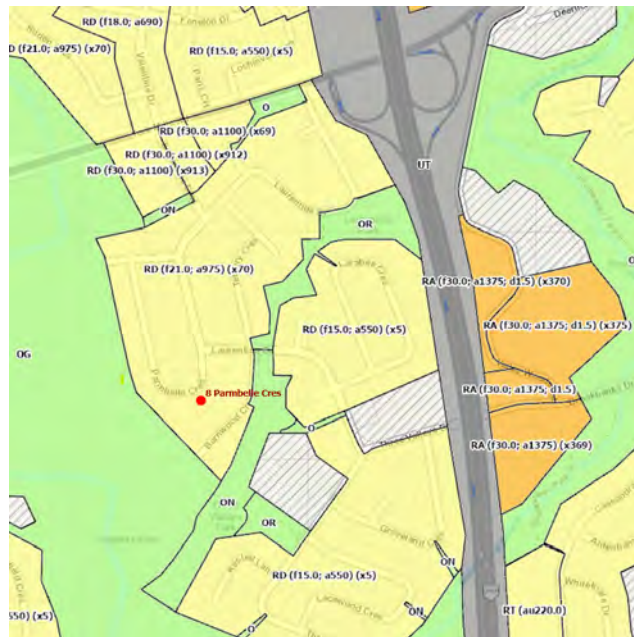


Figure 2: Extract from City Online Zoning Map

Appendix 2 is an excerpt from the City of North York Zoning By-law 7625 Schedule that is still applicable to the 58 Three Valleys Drive property, illustrating the C1 zoning.

**COMPARISON REFERENCE TO 58 THREE VALLEYS DRIVE TOWNHOUSE**

## **DEVELOPMENT**

It is my understanding that at the recent Public Meeting on the subject application, the applicant made reference to a townhouse development approval at 58 Three Valleys Drive to support the proposed development as being comparable to a similar use in the Neighbourhood. The site at 58 Three Valley Drive is not within the geographic Neighbourhood referenced in the applicant's Planning Rationale Report. The site is at the edge of the larger neighbourhood in a very different land use context. The land is zoned C1 Commercial under the applicable zoning by-law, within which residential uses are permitted, including townhouses. The site is also immediately adjacent to existing townhouses and across from institutional uses, including a Place of Worship and a school.

The site at 58 Three Valleys Drive is well served by a bus route, with stops immediately abutting the property. I also understand there is no proposal to subdivide the land at 58 Three Valleys Drive.

The context of this site is entirely different than the subject property and does not provide a meaningful comparison for the development proposed by the subject Zoning By-law Amendment Application.

## **INTERPRETATION OF THE CITY OF TORONTO OFFICIAL PLAN WITH REGARD TO THE DIFFERENCE IN LAND USE INTENSITY BETWEEN A TOWNHOUSE AND A MULTIPLEX USE**

The Applicant's planner implies that there is no difference between a four-unit townhouse block and a four-unit multiplex as part of their justification for the appropriateness of the development. The Official Plan permits both uses on lands designated Neighbourhoods, however, the current RD zoning of the property does not permit townhomes but does permit multiplexes. The distinction drawn between townhomes and multiplexes in the Zoning By-Law necessitates the Zoning By-Law Amendment that is being considered.

It should also be noted that while the Official Plan does generally permit both forms of development, it still differentiates between townhouse and fourplex developments. A four-unit townhome development is considered a more intense form of residential development in comparison to a fourplex. This is supported by OPA 649, which added Site and Area Specific Policy No. 826 to the Official Plan.

In order to be exempted from Policy 4.1.5, a multiplex is encouraged to reuse the foundation and building materials from the site in the development, and its construction is not permitted to result in the damage or destruction of trees. The policy is structured in such a way as to permit new developments that replace a single detached dwelling, while strongly encouraging the use of internal renovations and modest additions in order to increase the number of units on a given lot without significant changes to the existing building envelope and character.

A townhome development, such as the one being proposed, requires that the existing building be demolished and replaced with a different built form. Of more significance, the proposed townhouse development requires the creation of additional lots through additional *Planning Act* applications, including the subject Zoning By-law Amendment and a subsequent Consent or Draft Plan of Subdivision Application.

That a townhome block is a more intense use than a fourplex is reinforced in material that City Staff have prepared as part of the Expanding Housing Options in Neighbourhoods (EHON) Project. For example, Staff have previously illustrated a spectrum of “missing middle housing options” that they are seeking to permit in appropriate locations within Neighbourhoods. In their communications to Council, a fourplex is considered a less intense form of development in comparison to a four-unit townhouse development (with the possible inclusion of secondary suites in the townhouses) (Figure 3).

# Missing Middle Housing Options

The Missing Middle refers to housing forms that range from duplexes to low-rise walk-up apartments many of which can be found in a number of Toronto's neighbourhoods today.

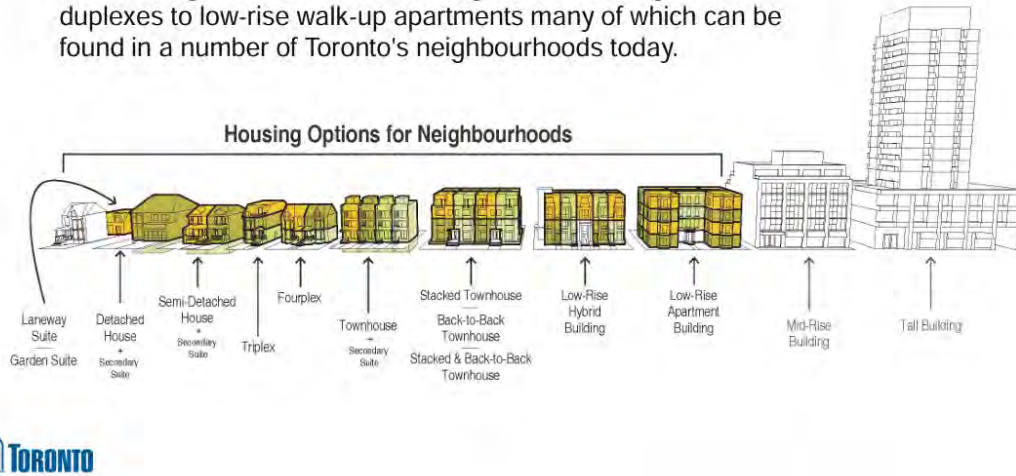


Figure 3. Slide Four of Slideshow MM9.36 prepared for the July 13, 2020 City Council meeting. This image is commonly reproduced in many materials prepared by City Staff

Furthermore, the Expanding Housing Options in Neighbourhoods: Multiplex Study - Proposals Report, dated June 17, 2022, includes a discussion of various methods of permitting multiplexes city wide that staff explored. The excerpt below is found on page 20 of the report:

*The R and RM zones in Zoning By-law 569-2013 permit duplexes, triplexes and fourplexes. Staff considered an approach to rezone areas that do not currently permit multiplexes to the R or RM zones; however, these zones also permit more intense residential building types which are beyond the scope of this study, including townhouses and apartment buildings. **Rezoning suburban areas zoned RD to the R zone would result in substantial and unintended physical change, as the performance standards in each residential zone are reflective of the existing built form context and lot patterns found in the Neighbourhoods to which the zone applies.** [Emphasis added]*

Staff directly state that townhouses are a more intense form of development than a fourplex, and that changing RD zoning to R would result in undesirable physical changes to certain neighbourhoods. Though this excerpt references zoning, the Zoning By-Law Amendment and Official Plan Amendment prepared by staff were prepared simultaneously, and it is clear that they viewed townhomes as more intense than multiplexes. This contradicts the Applicant's rationale for the townhouse development on the subject site. Therefore, the proposed Zoning By-Law Amendment does not conform with the Official Plan.

## **ZONING BY-LAW**

The subject property is zoned Residential Detached (RD) (f21.0; a975) (x70) under City of Toronto Zoning By-law No. 569-2013. The applicant proposes maintaining the RD Zone category but amending the RD zone with site-specific Exceptions. This site-specific exception includes amendments to Zoning By-Law 569-2013 that would affect:

- Front yard and soft landscaping;
- Driveway widths;
- Permitting a townhouse built form where it is not permitted in the zone category;
- Lot size;
- Lot frontage; and
- Setbacks

The most significant proposed amendments are to permit a use not permitted in the RD zone category and the decreases to the minimum lot area and frontage regulations. As discussed previously, these regulations would result in a built form that does not respect and reinforce the physical character of the established neighbourhood.

It should be noted that the Applicant's Planning Justification Report does not justify the proposed amendments to the RD zone regulations. Instead, reference is made to some of the relevant RD zone regulations and it then summarizes the regulations of a different zone in Table 2, those of the Residential Townhouse (RT) zone, and states that:

*Table 2 shows the proposed townhouse buildings comply with the Zoning By-Law's generic development standards for townhouses as set out in the Residential Townhouse RT zone except for the minimum lot frontage on the two internal townhouse lots”*

The fact that townhouse development generally complies with the RT zone regulations for townhomes is not relevant in this context. The site is not currently in an RT zone, wherein townhouses are a permitted residential use form. It is in a Residential Detached (RD) zone, wherein single detached dwellings predominate. The proposed townhouse development and associated Zoning By-Law Amendment, will not be compatible with the physical character of the established residential Neighbourhood, which at this time is entirely composed of single detached residential dwellings.

#### **DRIVEWAY ACCESS, STREETScape AND GENTLE INTENSIFICATION**

There is a distinction between townhome and multiplex developments with regard to land use intensity that affects streetscape, which is a significant part of neighbourhood character. Multiplexes can often be constructed without any changes to the building envelope while the construction of freehold townhouses requires that the existing buildings be demolished and replaced and additional lots to be created. Multiplexes also do not require multiple access, such as multiple driveways.

The freehold townhouses, such as those proposed on the subject site, will introduce additional smaller lots to the neighbourhood, each with a driveway, resulting in a decrease in the minimum amount of soft landscaping required in the front yard of the subject site from a minimum of 75% to the 59% proposed which significantly changes the established streetscape. This significant change clearly does not respect and reinforce the character of the neighbourhood.

This is a reason why a four-unit townhouse development and a fourplex have different

impact on the character of the neighbourhood. A multiplex development can be built without any changes to the building envelope or driveway access of a site, whereas a freehold townhome development requires significant change, including lot creation and lot size reduction, both physical changes to the neighbourhood. Though both are examples of gentle intensification and missing middle housing options, multiplex developments are less intense (gentler) and in a neighbourhood that has yet to see any intensification. This is also why townhouses are not permitted in the RD Zone.

## CONCLUSION

It is my opinion that the proposed development is not appropriate as it does not respect and reinforce the physical character of the established Neighbourhood. Therefore, the proposed Zoning By-law Amendment does not conform to the Official Plan and should not be approved.

MPLAN Inc.

A handwritten signature in blue ink that reads "Michael S. Manett". A horizontal line extends from the end of the signature to the right.

Respectfully submitted by:

April 24, 2026

## APPENDIX A: SITE PHOTOS TAKEN APRIL 14, 2026



*6-10 Parmbelle Crescent as seen from the street*



*8 and 10 Parmbelle Crescent as seen from the street*



*8 Parmbelle Crescent as seen from the street*



*10-16 Parmbelle Crescent as seen from the street*

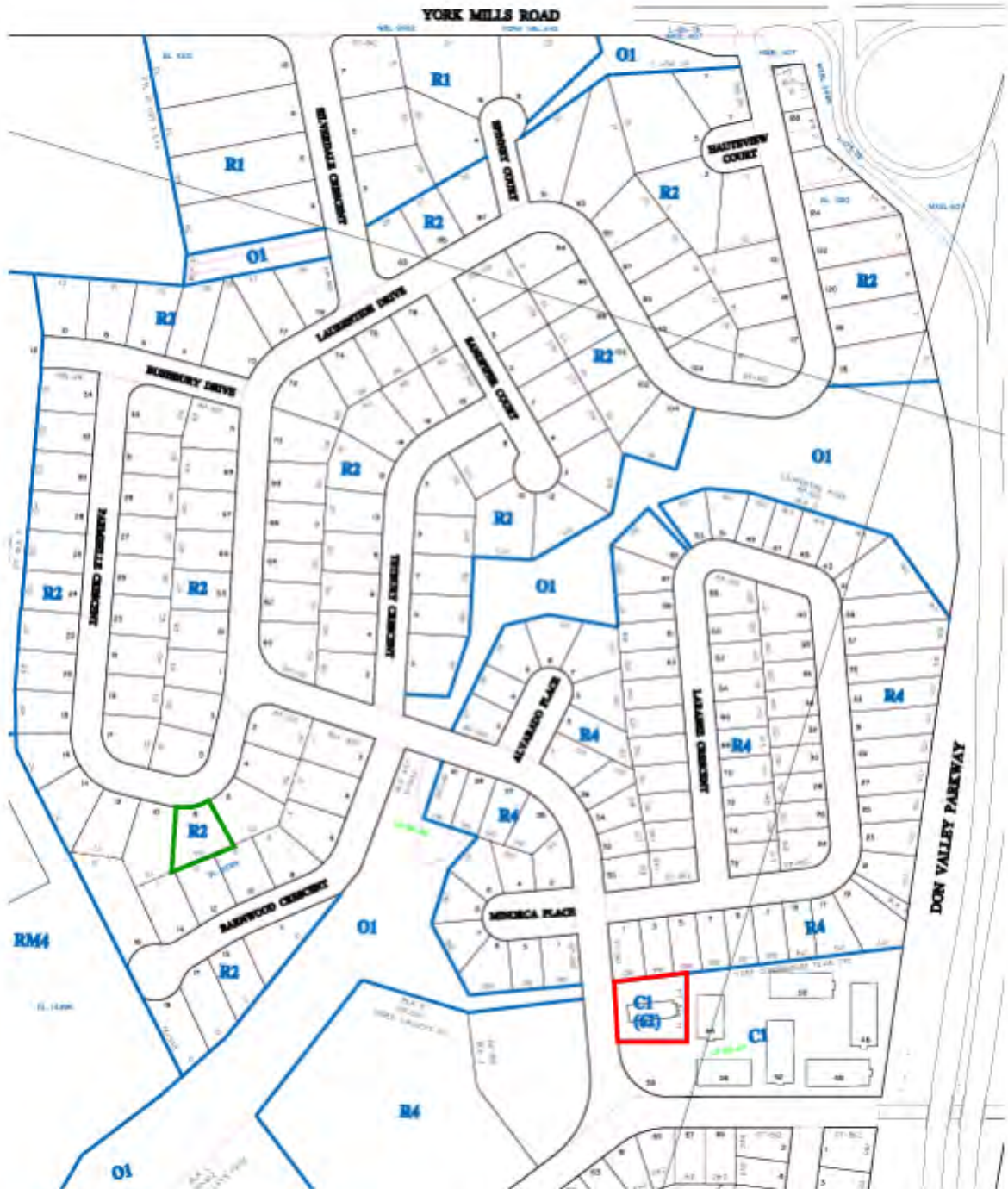


*12-16 Parmbelle Crescent as seen from the street*



*Rear Yard of 8 Parmbelle Crescent taken from 10 Parmbelle Crescent*

# APPENDIX B: EXCERPT FROM FORMER CITY OF NORTH YORK ZONING BY-LAW 7625 ZONING MAP



Excerpt from Map 13 of City of North York Zoning By-Law 7625. 58 Three Valleys Drive is outlined in red, 8 Parmbelle is outlined in green. Note the different zoning in the two neighbourhoods and that Zoning By-Law 7625 is only applicable to 58 Three Valleys Drive, the other C1 area and the R4 school site

APRIL 24, 2026

PROJECT NO: 3099-7833

SENT VIA: EMAIL

Stephen Cole  
12 Barnwood Court, Don Mills  
Toronto ON, M3A 3G1

**Attention: Stephen Cole**

**RE: SERVICING LETTER – PEER REVIEW  
8 PARMBELLE CRESCENT  
NORTH YORK, CITY OF TORONTO**

Dear Stephen,

C.F. Crozier and Associates Ltd. (Crozier) was retained by Stephen Cole. (the Client) to undertake a peer review of the Functional Servicing and Stormwater Management Report (FSR) prepared in support of the proposed development at 8 Parmbelle Crescent in North York, City of Toronto.

This letter has been prepared to:

- Assess whether the proposed servicing and stormwater management approach is generally consistent with applicable municipal criteria and accepted engineering practices.
- Identify any apparent technical deficiencies, gaps, or inconsistencies within the submitted materials.
- Provide an independent professional opinion regarding potential drainage and stormwater-related implications for adjacent properties, based solely on available information.

### Summary of Concerns and Deficiencies

- With respect to Quantity Control and Water Balance criteria, the City's Wet Weather Flow Management Guidelines (WWFMG) are applied inconsistently for the proposed development.
- Insufficient information provided to confirm whether the 100-year storm drainage north to the municipal right of way is controlled to the 2-year allowable release rate.
- The 100-year storm drainage to the south is not proposed to be controlled to the 2-year allowable release rate as per the city's WWFMG.
- Confirmation of the groundwater discharge strategy has not been provided for the proposed development.
- Confirmation of municipal sanitary sewer capacity has not been provided for the proposed development.
- Confirmation of adequate municipal water pressure and flows has not been provided for the proposed development.

## Study Parameters

This letter is based on the review of the following documents:

- Functional Servicing and Stormwater Management Report for Proposed Development at 8 Parmbelle Crescent, North York, City of Toronto, ON, prepared by Geomape Geotechnics Inc., dated November 6, 2026.
- City of Toronto Design Criteria for Sewers and Watermains, prepared by City of Toronto, revised January 2021.
- City of Toronto Wet Weather Flow Management Guidelines, prepared by City of Toronto, revised November 2006.
- Development Engineering, Development Review – North York District comments, dated March 11, 2026.
- 8 Parmbelle Crescent – Zoning Amendment Application Final Report – Refusal, Community Planning, North York District, dated April 13, 2026.

## Proposed Stormwater Management

### Water Quantity Control:

The City's Wet Weather Flow Management Guidelines (WWFMG) requires that the 100-year post-development flow be controlled to the 2-year pre-development flow rate. The FSR, prepared by Geomape Geotechnics Inc., compares post-development storm events with their corresponding pre-development events (e.g., 2-year post to 2-year pre, 5-year post to 5-year pre), but the report does not propose to control the 100-year post to the 2-year pre-development rate, which is required. The overall site was subdivided into parts as shown below. With drainage split to the north and south.

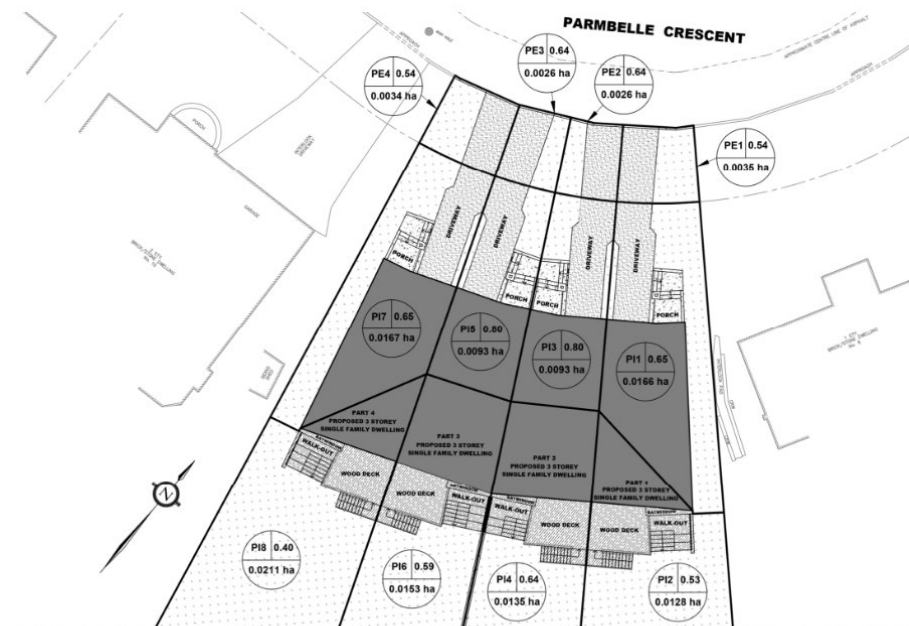


Figure 7. Proposed Sub-Catchments at 8 Parmbelle Cres., City of Toronto

Flows to the South

The FSR notes that the existing flows to the south are as shown below. With the 2-year allowable being **9.99 L/s**.

**Table 39. Existing Uncontrolled Peak Flow of Runoff Flowing Southward**

Storm Event (Year)	Existing Total Peak Flow (l/s)
2	9.999
5	14.943
10	18.399
25	21.489
50	25.435
100	28.383

It is noted that no stormwater controls are proposed for the drainage to the south and the post development flows are summarized in the below table.

**Table 40. Proposed Uncontrolled Peak Flow of Runoff Flowing Southward from Parts 1 to 4**

Storm Event (Year)	Proposed Peak Flow Rate (l/s)				
	Part 1	Part 2	Part 3	Part 4	Total
2	1.649	2.112	2.194	2.050	8.005
5	2.464	3.157	3.279	3.064	11.964
10	3.034	3.887	4.037	3.772	14.730
25	3.543	4.540	4.715	4.406	17.204
50	4.194	5.373	5.581	5.215	20.363
100	4.680	5.996	6.228	5.819	22.723

While there is a reduction in flows to the south in all storm events, the 100-year post development flow rate (22.732) exceeds the 2-year allowable release rate of 9.99 Ls. This discrepancy should be addressed by applying quantity controls.

Flows to the North

As noted in the FSR the total 2-year allowable releasable rate to the municipal storm sewer on Parmbelle Crescent is **7.045 L/s**. As shown in the below table.

**Table 38. Allowable Release Rates of Runoff Flowing Northward from Part 1 to Part 4**

Part	Allowable Release Rate (l/s)
Part 1	2.044
Part 2	1.482
Part 3	1.480
Part 4	2.039
<b>Total</b>	<b>7.045</b>

It is noted that due to an increase in pervious areas that post development quantity controls are required.

The report lacks detailed calculations or conclusive language in the body to confirm whether the detention sizing meets the 100-year to 2-year stormwater control criteria. A summary post development of the 100-year flows to the municipal sewer should be provided in the FSR. It is not clear if the 100-year flows are controlled to the 2-year allowable release rates noted above.

It is also noted that to retain and store stormwater on site within catchbasin maintenance holes (CBMHs) 25 mm diameter plates are proposed for Parts 1 and 4 and 23 mm orifice plates are proposed for Parts 2 and 3. The City typically does not permit plates smaller than 75 mm diameter. For low release rates the City recommends Vortex Valves be proposed.

### **Water Balance**

The report cites Section 2.3.4 of the WWFMG, which does not exist. Based on the reference to a 0.3 ha site size, it seems the report is following the non-residential criteria from Section 4 (Table 7) intended for sites smaller than 0.3 ha, which is not applicable to this residential development. For residential sites under 0.1 ha which we believe is the closest applicable section - Section 3 (Table 7), the correct water balance criteria should be: "In case the subsoil conditions on-site are not suitable for infiltration, the proponent shall provide a minimum depth of 300 mm absorbent soil for on-site pervious/landscaping areas." We recommend confirming that the correct residential criteria are applied to ensure consistency with the WWFMG.

### **Water Quality**

The report concludes that additional quality controls may not be needed for small residential sites with a low potential for spills. While this conclusion aligns with our interpretation of the guidelines, the report appears to reference the wrong section of the WWFMG. We recommend confirming and consistently applying the correct section throughout the report.

### **Erosion Control**

The report correctly acknowledges the need for erosion and sediment controls during construction, which is in line with the WWFMG requirements.

## **Proposed Groundwater Discharge**

The FSR prepared by Geomape Geotechnics Inc. does not speak to the existing groundwater conditions. It does not appear that a Hydrogeological Report has been prepared or submitted for the development. It is noted that the Development Engineering comments have requested a groundwater strategy be provided as part of the resubmission to the City and that a Hydrogeological Investigation is required.

## **Proposed Sanitary Servicing**

As noted in the FSR prepared by Geomape Geotechnics Inc. the proposed development will be serviced by the existing 300 mm $\varnothing$  sanitary sewer on Parmbelle Crescent. The FSR notes there will be an increase in flow of 0.229 L/s and that a down stream capacity analysis should be performed to confirm there is adequate capacity in the municipal sanitary sewer system for the proposed increase in flow. It is noted that the Development Engineering comments also note that a downstream capacity analysis is required.

## Proposed Water Servicing

As noted in the FSR prepared by Geomape Geotechnics Inc., the proposed development will be serviced by the existing 150 mmØ watermain on Parmbelle Crescent. As the report was submitted during the City's moratorium on flow testing during the winter months, a hydrant and flow test will be required to confirm adequate flows and pressures within the municipal system to support the proposed development. It is noted that the Development Engineering comments also note that a hydrant and flow test is required.

Should you have any questions or require any further information, please do not hesitate to contact the undersigned.

Sincerely,

**C.F CROZIER & ASSOCIATES INC.**



Ashish Shukla, P.Eng.  
Director, Toronto

/ECM/am

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