



February 21, 2025

**Memo to:** Kaitlyn Graham, Planning Manager  
**From:** Sasha von Kursell, Parks Planning & Policy Coordinator  
**Copy to:** Michelle Dobbie, Manager Park and Natural Heritage Planning  
**File Number(s):** City File No: OPA-24-0007 & ZBLA-24-0013  
**Location:** 0, 47 and 59 Brookside Road; 0, 11014, 11034, 11044 and 11076 Yonge Street; and, 12 and 24 Naughton Drive  
**Applicant:** Weston Consulting  
**Owner:** Yonge MCD Inc. C/O Armour Heights Development

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**Application:**

A request for approval of Official Plan and Zoning By-law Amendment applications to permit the construction of a medium and high density residential/community use development comprised of five (5) high-rise residential buildings of 29, 31, 33, 38 and 49 storeys, as well as 45 townhouse dwelling units and two (2) community centres on the subject lands. The development is proposed to have a total of 1,850 units and a gross floor area of 174,675 square metres (1,880,186 square feet) at a Floor Space Index of 6.8. A total of 1,348 parking spaces are also proposed.

**Official Plan Amendment 24-0007 & Zoning By-law Amendment 24-0013 Comments**

*Parkland Dedication*

1. The City previously secured a linear park through the development review process for Official Plan Amendment D01-16002, Zoning By-law Amendment D02-16012 and Draft Plan of Subdivision D03-16006, and will continue to seek and secure the maximum allowable parkland dedication through the current development applications.
2. It is the City's intent to develop the Park into a linear park. We understand that the width of the block will vary along its length to allow for the organic nature of the boundary to the natural heritage lands and to support the creation of developable Blocks. However, to achieve usable and programmable parkland, the park block, exclusive of the natural heritage lands, should be no less than 10m at the narrowest points per SRPRS.19.133. Please demonstrate on the plan that the park blocks are a minimum 10m wide along their length.
3. PNHP (Park & Natural Heritage Planning) understands Weston Consulting erroneously included natural heritage and open space lands within the lands shown as "Park" in this submission and this error will be addressed in subsequent submissions.
4. PNHP notes the applicant is proposing a Community Centre in Phase 3 of the development. It is unclear from the submission if these lands and facilities will be conveyed to the City or remain in private ownership. It is our understanding there is no direction in the City's Recreation and Culture Plan, November 2024 to support a facility in this area of the City.

5. It is unclear from the Phasing when the stormwater management facilities, open space and park block will be improved. It is PNHP's understanding that the Park and SWM blocks will be conveyed and completed in the first phase.
6. We note a drawing showing tiebacks, piers and other engineering elements needed to construct the subsurface structures was not included with the submissions. Please note, the City does not allow tiebacks, piers, etc. to encroach into the natural heritage lands. The applicant's consultants should ensure the building can be constructed without using tiebacks along the eastern edge of the development.

*Planning Justification Report, Weston Consulting, October 2024 File #7179*

7. PNHP notes there appears to be some changes to the block sizes, uses, other revisions, etc. to the underlying draft plan of subdivision that was approved through the associated application D03-16006. It is unclear from the planning report what process the applicant will follow to capture the changes to the Draft Plan of Subdivision, whether there will be a new application or, subject to the City's concurrence, a red-line revision.

*Functional Servicing and Stormwater Management Report, SCS Consulting Group, Project 1613, December 2024*

8. The consultant's report notes opportunities for LID's are "limited to what the municipality will accept in the ROW and park blocks". In terms of LIDs and SWM facilities in the park block, the City's Official Plan (Policy 3.1.8(3)(h)) and Parkland Dedication By-law 123-22 (Section 5) provide clear direction on this matter and the City does not accept lands used for stormwater management purposes as parkland. The Official Plan defines SWM works to mean "any works designed for the collection, transmission, treatment, or disposal of stormwater or any part of such works", such as the infiltration galleries and other LIDs. In this regard, the City will not agree to any SWM infrastructure and functions within the Park Block. The applicant should look for opportunities within the developable lands for LID and SWM opportunities.

*Preliminary Landscape Plan, James McWilliam Landscape Architect, 1 November 2024*

9. The Landscape Plan is conceptual and lacks detail. It is sufficient to support the Zoning By-Law and Official Plan Amendment applications however, the applicant will be required to submit more detailed landscape plans as these applications progress through the subdivision and site plan application processes.
10. The landscape architect should ensure that a minimum soil volume of 30 cubic metres per tree and a minimum 1.5 metres of topsoil is provided in landscape beds over the proposed underground parking structure.

*Natural Heritage Report, Beacon Environmental Limited, Project 214051, December 2021*

11. PNHP acknowledges receipt of the Natural Heritage Evaluation and do not have any comments at this time.

*Arborist Report, Beacon Environmental Limited, Project 214051, December 13, 2024*

12. Although the arborist's report is adequate, the applicant must submit a letter of consent from the abutting neighbour(s) agreeing to the injury/destruction of co-owned/boundary trees prior to approval of the amendment applications. While the City does not take issue with the Arborist Report recommendation to injure some of these trees, the City's approval of this report does not authorize the Owner to injure or destroy a co-owned/boundary tree or tree on the neighbouring property without obtaining the consent of the neighbour tree owner or boundary tree co-owner. It is the applicant's responsibility to obtain necessary consent prior to undertaking any tree injury or destruction approved by the City.

The Forestry Act states that "every tree whose trunk is growing on the boundary between adjoining lands is the common property of the owners of the adjoining lands and every person who injures or destroys a tree growing on the boundary between adjoining lands without the consent of the landowners is guilty of an offence under the Act."

13. The submitted arborist report is sufficient to support the official plan and zoning applications. We note however, this is not an approval for the removal or injury of the City's or private trees. PNHP staff will complete a comprehensive review of the development and its impact on the City's trees and private trees as this application progresses through the planning and development processes. Additionally, the City may wish to preserve and protect trees within the City's right-of-way or preserve space for street tree planting within the boulevard which may require the applicant to reposition driveways and/or relocate the servicing locations.

14. The arborist's report currently indicates numerous native and non-native trees will be destroyed to accommodate the applicant's development proposal and the proposal leaves no opportunity to preserve any of the existing native and non-native trees. The City will seek to restore the tree canopy within the development by securing tree planting and/or compensation for the loss of these trees through the development process. The City will secure compensation either through planting within the development, cash-in-lieu of replanting, or a combination of both.

15. PNHP defers to the Region to review and approval trees removals and protection measures along Yonge Street.

16. PNHP notes there is an outstanding tree by-law infraction for illegal tree removals that occurred in 2012. Correspondence between the City's tree By-law Officer and the Owner indicates that the Owner paid a fine and agreed to plant 200 trees within the development as compensation for the illegal destruction of trees within the site. The City will secure the tree compensation planting within the site through the associated subdivision and site plan applications.

*Toe Erosion Allowance Study, Geoprocess Research Associates, August 2014*

17. PNHP staff note this report was prepared before the need for the Stormwater Management Pond was established and the SWM Block created. It is unclear if SWM Block, and associated engineered earth works, would alter the outcome, and change the recommendations of the report.

*Draft Official Plan and Zoning By-law Amendment Applications OPA-24-0007 and ZBLA-24-0013*

18. PNHP has no objection to the proposed official plan and zoning by-law amendments to support the increase in density, ect. for development proposal as shown. The City will review and secure the landscape plans, administer tree compensation matters, and address other works through future and concurrent Planning Act applications and the Site Alteration Permit process.
19. PNHP notes the Draft ZBLA includes a provision to allow 0 metre front yards and notes this will not support opportunities for tree planning or other landscaping within the private spaces along the public roads.
20. Once the limits of the park block are finalized, the schedules to the amendments will need to be revised accordingly.

*Conceptual Site Plan, Tregobov Cogan Architecture, Revision 1, December 13, 2024*

21. PNHP provided comments directly on the plan for your convenience, see attachment.

I trust this is of assistance. Should you require any further information regarding our comments, please contact the undersigned.

Sincerely,

SIGNED

**Sasha von Kursell MURP, MCIP, RPP**

*Parks Planning & Policy Coordinator*  
Parks & Natural Heritage Planning  
Planning & Infrastructure Department

Attachment: Conceptual Site Plan

