



July 30, 2026

To: Mayor Chow, Deputy Mayor Ainslie, and Members of the Scarborough Community Council

Regarding: MM43.119 Considering the cumulative impacts of development activity in Cliffcrest to ensure proper planning and balance growth

The Cliffcrest Scarborough Village SW Residents Association (CSVSWRA) is submitting this official written deputation regarding ongoing development authorizations along the Kingston Road corridor. I want to state clearly that our Association supports responsible growth, additional housing, and sensible revitalization.

We support Motion MM43.119 to monitor development applications along this corridor and we appreciate Council's attention to this matter. However, we wish to submit additional critical information for your consideration.

While tracking development activity is an important first step, it does not provide the legal mechanisms needed to prevent systemic infrastructure failure. Therefore, we urge Council to upgrade this tracking directive to mandate a formal Cumulative Infrastructure Impact Study or a Local Area Study.

Our community has shared extensive documentation regarding these cumulative impact concerns with City staff over the past five years. As development pressures continue to grow, immediate and binding planning tools are urgently required to safeguard our infrastructure.

1. Technical Deficiencies in Cumulative Stormwater and Wastewater Capacity

The current development review framework relies almost exclusively on site-specific Functional Servicing Reports (FSRs) submitted by individual applicants in isolation. This methodology creates a critical planning vulnerability:

- **The Development Pipeline Blindspot:** Five major, highly concentrated applications (3291 Kingston Rd, 27-29 Parkcrest Dr, 3310 Kingston Rd, 3355 Kingston Rd, and 5-11 Bellamy Rd S) will introduce over 3,000 new residents within a tight two-block radius.
- **Siloed Baseline Testing:** Individual FSRs only test a project's servicing capacity against today's existing infrastructure. They completely omit the compounding, concurrent load of the other four adjacent developments currently sitting in the application queue.
- **Obsolete Hydrological Modeling:** The Area 52 and Area 59 Basement Flooding Studies document severe, pre-existing stormwater deficits. Relying on an obsolete 100-year storm standard fails to reflect local climate reality, where Toronto has shattered this threshold four times in recent decades (2005, 2013, 2018, and July 2024).

- **Fragile Bluffs Hydrology:** Most urgently, our neighbourhoods run parallel to the Scarborough Bluffs hazard zone. Deep concrete footprints for multiplexes and towers alters underground hydrology. Failing to study how this inland intensification with significant loss of permeable surface and increased stormwater runoff impacts Bluffs erosion is a catastrophic failure of municipal oversight.

2. Premature Removal of Performance Standards and Holding (H) Symbols

The practice of deferring structural infrastructure reviews to the localized Site Plan Approval stage circumvents proper municipal oversight.

- **The 3291 Kingston Road Precedent:** On recent files within this corridor, site-specific Zoning By-law Amendments and Holding (H) provisions were cleared despite outstanding technical concerns submitted that remain unaddressed.
- **Elimination of Avenue Segment Studies:** Waiving Avenue Segment Studies on site-specific appeals undermines the core intent of the Official Plan. Passing isolated, site-specific zoning amendments—such as the 22-storey proposal at 2746 & 2800 Kingston Road adjacent to the congested Bluffer's Park entrance—completely outpaces the City's internal baseline data and violates mid-rise "Avenue" policies.

3. Compounding Material Planning Pressures on the Scarborough Bluffs

The uncoordinated layering of high-density directly violates the provincial mandate for orderly, infrastructure-led growth:

- **Regional Gridlock:** Kingston Road is a critical artery for thousands of daily Durham Region commuters. Flooding the **Guild, Cliffcrest, and Scarborough Village** with massive condo-to-rental conversions will paralyze this corridor and cause dangerous spillover onto residential side streets.
- **Double-Layer Intensification:** Forcing hyper-density into the Guildwood and Eglinton GO Major Transit Station Areas (MTSAs), while concurrently absorbing widespread intensification via the Express Horizon and Housing Options (EHON) multiplex frameworks, creates an unsustainable "double-layer" of growth that has never been cumulatively modeled.
- **Mid-Century Infrastructure Strain:** Our water, storm runoff, and sewage systems are aging mid-century models. They cannot handle massive corporate rental complexes paired with residential multiplex conversions.

4. Statutory Framework: Preservation of Council's Duty of Care

While provincial legislative shifts via Bill 23 (*More Homes Built Faster Act*) and Bill 185 (*Cutting Red Tape to Build More Homes Act*) fast-track individual housing applications, they do not absolve the City of its fundamental Duty of Care.

- **PPS Section 1.6.1:** Explicitly mandates that infrastructure and land-use planning *must* be coordinated and integrated to ensure efficiency and public safety.
- **Planning Act Section 36:** Preserves Council's absolute statutory authority to implement Holding Provisions (H) to ensure local servicing capacity is verified *before* development rights are fully realized.

The multi-year history of unresolved technical data gaps between our association, Toronto Water, and the Toronto and Region Conservation Authority (TRCA) from 2021 to 2026 confirms that a

regulatory vacuum exists. These concerns cannot be evaluated until the municipality formally initiates a coordinated, area-wide study.

Despite persistent **technical inquiries** submitted by this association to the Development Review Team and the Area 52/59 Flooding Study Team over a five-year period, these critical cumulative data gaps remain entirely unaddressed within the current site-specific review framework. Without an ICBL to pause approvals, development will proceed in a regulatory vacuum.

5. Requested Actions and Structural Safeguards

Housing density must not come at the cost of basic civic infrastructure and community safety. We urge Council to introduce and support a policy motion establishing the following four safeguards:

1. Because we are approaching a black out period due to the upcoming election, enact an Interim Control By-law (ICBL). Immediately invoke Section 38 of the *Planning Act* to establish an ICBL along the Kingston Road corridor (Brimley Road to Markham Road), pausing high-density rezonings while a comprehensive land-use and infrastructure review is completed.
2. Mandate a Cumulative Infrastructure Impact Study: Enforce Section 1.6.1 of the PPS by directing City Planning, Toronto Transportation Services, and Toronto Water to execute a unified, corridor-wide infrastructure capacity study modeling the combined, concurrent impacts of all active and proposed pipeline developments.
3. Enforce Mandatory Holding Provisions (H): Enact a strict municipal directive under Section 36 of the *Planning Act* barring staff from removing or waiving Holding symbols in designated growth zones until cumulative servicing and hydrogeological capacity is fully verified.
4. Publicly Release Corridor Data: Order the immediate public release of all existing internal cumulative study reports referenced by staff, and provide formal technical responses to the outstanding inquiries submitted by our association.

By proactively initiating this comprehensive study, Council has the opportunity to model balanced, climate-resilient growth that protects both new and long-time residents. Taking these necessary steps ensures that our shared infrastructure remains safe, reliable, and capable of supporting a thriving community for generations to come.

We sincerely thank you for your leadership, time, and consideration, and we look forward to working collaboratively with Council on these vital structural safeguards.

Sincerely,

The Board of Directors

Cliffcrest Scarborough Village SW Residents Association (CSVSWRA)

<https://cliffcrestscarboroughvillagesw.ca>

Additional information:

- . **[Read Letter]** <https://cliffcrestscarboroughvillagesw.ca/data/documents/CSVSWRA-Letter-re-Area-52-and-59Flooding-Team-November-21-2025.pdf>
- . **[Read Letter]** [CSVSWRA-Letter-re-3291-Kingston-Road-Site-Plan-Review-March-9-2026.pdf](https://cliffcrestscarboroughvillagesw.ca/data/documents/CSVSWRA-Letter-re-3291-Kingston-Road-Site-Plan-Review-March-9-2026.pdf)
- Link to BIG Picture Map created by RA in 2022 to demonstrate scale of development being proposed <https://www.google.com/maps/d/u/0/viewer?mid=1-V1dBqxR4GSIZBxOeVusDmb34ufJZlcP&ll=43.7350905540572%2C-79.223535&z=13>

[Read Letter] <https://cliffcrestscarboroughvillagesw.ca/data/documents/CSVSWRA-letter-re-follow-up-to-September-9thPlanning-Meeting-request-for-Local-Area-Study-follow-up.pdf>

See deputation where cumulative impact concerns were presented July 9, 2026 regarding SC33.2 Zoning By-law Amendment for 3310–3314 Kingston Road, starting at 1:13

<https://www.youtube.com/watch?app=desktop&v=rhhwAgrE4ul&ra=m>

Some considerations that point to alternate approaches to how Provincial Policies could be interpreted:

- **Claims that an ICBL is illegal under Bill 185:** Bill 185 still legally permits a 1-year Interim Control By-law if an authentic land-use study is required. Our request is triggered by documented **Fragile Bluffs Hydrology** and incomplete basement flood models (Area 52/59) that actively expose the City to future structural liability.
- **Claims that a Local Area Study cannot pause applications:** Council holds the absolute authority to mandate **Holding Provisions (H)** on the parent zoning amendments. This allows applications to be processed (protecting the City from developer fee refund penalties) legally bars the pouring of concrete until cumulative infrastructure capacity is physically verified.
- **Claims that Site Plan matters are strictly delegated to staff:** Council still retains supreme authority over the **Zoning By-laws**. Because staff has a history of quietly dropping H provisions without notifying community parties, we encourage Council to step in and write **un-waivable infrastructure metrics directly into the parent Zoning By-law Amendments**.

EHON considerations:

While the focus of cumulative impact studies is often placed on large-scale condominium developments, City Council must urgently address the **unmonitored, compounding strain caused by multiplexes and 'gentle density' expansions**. Under the current framework, the **Committee of Adjustment evaluates each application as an isolated island, entirely blind to the aggregate toll on a neighbourhood**. In high-demand areas like Ward 20, minor variances are approved at an overwhelming rate without any mechanism to track how dozens of concurrent builds collectively wipe out the natural tree canopy,

eliminate permeable soft landscaping, exacerbate localized basement flooding, and exhaust on-street parking capacity. If the City's [Multiplex Monitoring Program](#) is purely observational and delayed until 2027, infrastructure will fail in real time. We urgently need cumulative impact assessments integrated into the Committee of Adjustment's review process so that 'gentle density' does not inadvertently result in severe infrastructure degradation."

Scarborough SW should be considered for immediate impact review given number of applications.

The City continues to cite policy on why a development should move forward without any checks and balances. There is not one traffic study that assesses the developments the city has approved all together.

- ✓ 52% of applications that go to COA are located in Scarborough SW.

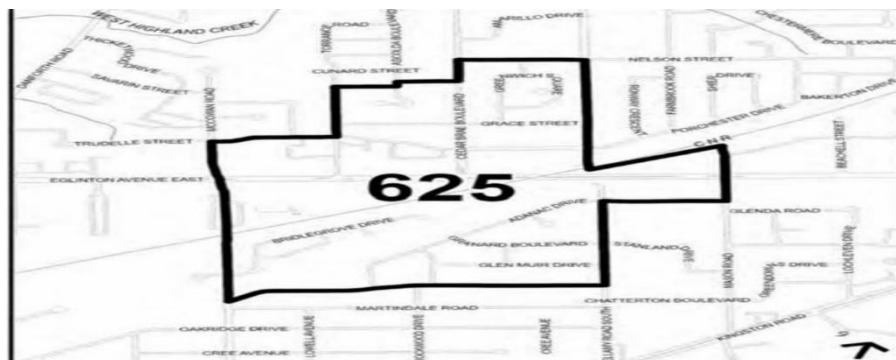
Count of C_OF_A_DECISION	Column Labels								
Row Labels	2017	2018	2019	2020	2021	2022	2023	2024	Grand Total
Scarborough Centre	47	52	55	44	59	35	46	33	371
Approved	43	51	53	42	58	32	45	33	357
Refused	4	1	2	2	1	3	1		14
Scarborough North	28	33	24	24	25	14	24	9	181
Approved	26	22	24	16	25	13	22	9	157
Refused	2	11		8		1	2		24
Scarborough Southwest	279	284	169	146	203	186	119	85	1,471
Approved	253	252	161	131	190	179	114	81	1,361
Refused	26	32	8	15	13	7	5	4	110
Scarborough-Agincourt	30	33	25	11	21	27	24	14	185
Approved	25	28	22	10	20	24	24	14	167
Refused	5	5	3	1	1	3			18
Scarborough-Guildwood	37	33	27	21	26	31	27	18	220
Approved	34	30	24	16	24	29	27	18	202
Refused	3	3	3	5	2	2			18
Scarborough-Rouge Park	67	73	47	44	53	46	50	24	404
Approved	65	73	47	42	47	44	42	24	384
Refused	2			2	6	2	8		20
Grand Total	488	508	347	290	387	339	290	183	2,832

Data included in the attached letters points to further risks from the many changes being pushed by the City through EHON Initiatives. <https://cliffcrestscarboroughvillagesw.ca/data/documents/PLN-CA-TL-Letter-of-Objection-Letter-of-Objection-2-187-Oakridge-Drive-4.pdf> Where can we find where the City included impact from these infill applications? Who in the City will be signing off that there will be no impact?

Zooming into Bellamy Application currently under review:

- There are 5 applications within 2 blocks of the development, 3291 Kingston Road Condo, 27 & 29 Parkcrest Drive townhomes, 3310 Kingston Road Condo, 3355 Kingston Road Condo, 5 – 11 Bellamy Road South. These developments alone will bring 3155 new residents within 2 blocks.

DEVELOPMENT ADDRESS	# Storeys	# of units		# Resident				# Parking Spaces			
		Total Units	Town Homes	Est. Residents	High limit	School/Daycare Potential	% Children	Total Parking	Resident Parking	Estimated Street Parking	Bicycles
3291 Kingston Rd., 2 & 4 Windy Ridge Dr.	12	320		608	846	198	23%	202	182	42	266
34 Annis Road, 3355, 3357, 3365 Kingston Rd.	12	309	18	590	800	198	25%	318	271	17	228
27 & 29 Parkcrest	4		144	357	486	198	41%	137	122	0	109
5, 7, 9, 11 Bellamy Rd. S	4		115	400	502	272	54%	73	67	14	94
3310 3312 3314 Kingston Rd.	11	323		427	521	118	23%	292	243	0	262
(Proposed on Toronto AIC) TOTAL		952	277	2382	3155	984	31%	1022	885		959



The MTSA boundaries for Eglinton Go just up the street on Bellamy that will add more to what is already in the pipeline.

DEVELOPMENT ADDRESS	# Storeys	# of units		# Resident				# Parking Spaces			
		Total Units	Town Homes	Est. Residents	High limit	School/Daycare Potential	% Children	Total Parking	Resident Parking	Estimated Street Parking	Bicycles
3291 Kingston Rd., 2 & 4 Windy Ridge Dr.	12	309		520	706	137	19%	284	238	18	233
34 Annis Road, 3355, 3357, 3365 Kingston Rd.	12	309	18	590	800	198	25%	318	271	17	228
2746, 2800 Kingston Rd.	11 & 22	439		815	1003	266	27%	558	492	-26	426
2799, 2815 Kingston Rd.	9	182		360	506	147	29%	169	132	38	
2872, 2880, 2882 Kingston Rd.	10	143		244	317	56	18%	145	121	6	114
3310 3312 3314 Kingston Rd.	11	323		427	521	118	23%	292	243	-35	262
3655 Kingston Rd.	10	104		177	229			87	87		115
3150 Eglinton Ave. E	12	132		244	339	82	24%	136	111	10	104
3060 Eglinton Ave. e	4 5-storey Towns	76		170	238	86	36%	76	76	0	62
320 McCowan Rd.	27 & 31	520		1012	1403	383	27%	537	459	39	422
253 Markham Rd.	18 & 19 + Towns	691	89	1406	1912	438	23%	635	489	76	602
66 & 80 Dale Ave.	7 & 12	285		545	733	209	29%	305	259	16	290
3201 Eglinton Ave.	12	132		244	324	82	25%	136	111	10	104
3730-3718 Kingston Rd.	14	435		680	843	139	16%	383	339	26	339
321 Scarborough Golf Club Rd.											
Metrolinx Project											
(Proposed on Toronto AIC) TOTAL		4080	107	7434	9874	2341	24%	4061	3428		3301

The chart shows developments in the pipeline up to 2023; more applications have been added and currently being reviewed. The Kingston Road corridor will see intensified use as development moves forward, more people will look to access parks in the community.

Details have been shared over and over again with various City Teams: ... most recently in our summary to City Planning Teams. **See pages 37 to 55.**

<https://cliffcrestscarboroughvillagesw.ca/data/documents/2025-Cliffcrest-Scarborough-Tour-FINAL.pdf>

Bits and bites projects that overlap and work in silos

The Safety Blindspot: The *Scarborough Village Streets Plan* and the *Safer Kingston Road Project* both document immediate safety and school-zone hazards in our current state. New developments are out of scope and not considered in the review of both these projects. Yet, developer-funded traffic reports model zero issues.

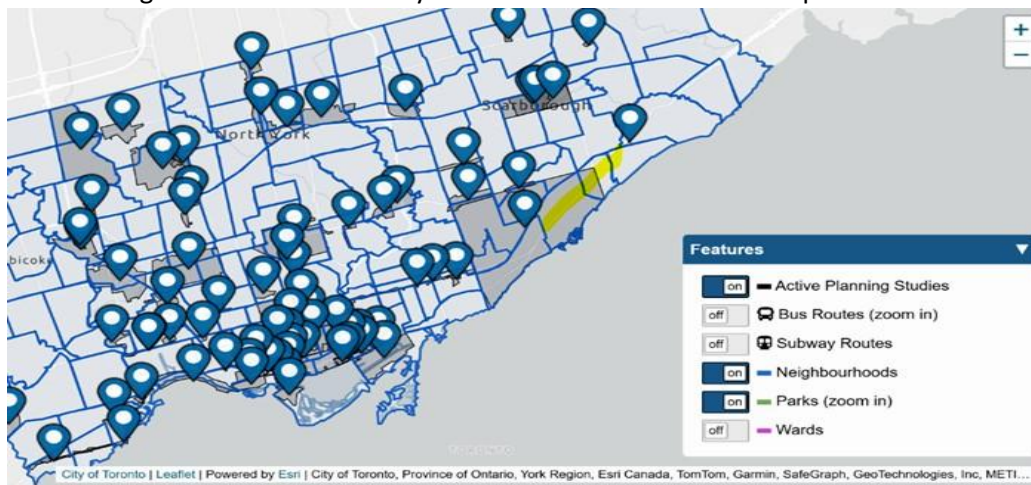
If our neighbourhoods had the Secondary plan we asked for in 2021 or the more recent request form Local Area Study. These studies would guide growth. Instead, we are offered bits and bites projects by the City that overlap and do not adequately address valid concerns to assess cumulative impact raised by the community.

Records indicate that previous to this CSVSWRA have followed up on concerns for studies and cumulative impact on:

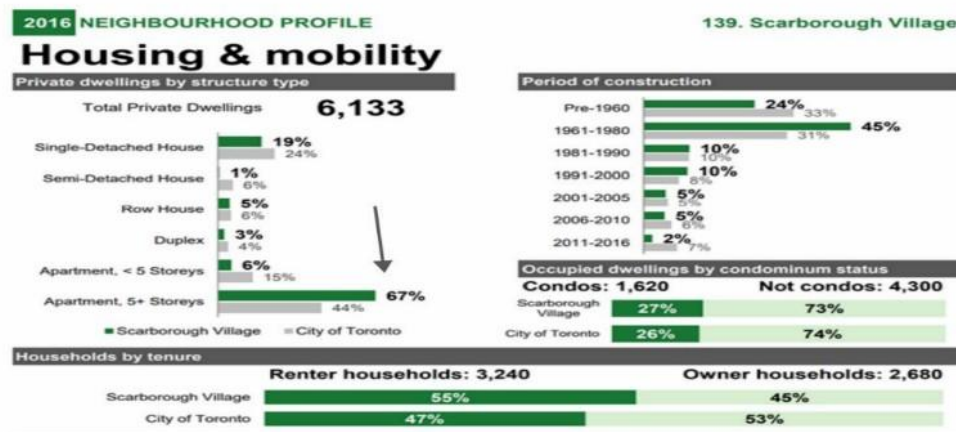
• April 5, 2021 • May 27, 2021 • June 14, 2021 • August 3, 2021 • October 1, 2021 • October 6 2021, follow up included in email chain below • October 20, 2021, follow up included in email chain below • January 19 2022, follow up included in email chain below • February 24 2022, follow up included in email chain below • April 18, 2022 • May 9, 2022 • July 7, 2022 - Toronto Water meeting • July 14, 2022 • July 28, 2022 • (August 24, 2022 to October 24, 2022 black out due to election) • November 30 2022, follow up included in email chain below • March 9th, 2023, follow up included in email chain below • March 16, 2023, follow up included in email chain below

(*Note: For simplicity I have only included details related to Secondary Plan & “Environmental Neighbourhood Character Guidelines” in this follow up. **There were more!**

The City Area Studies Map reveals many active studies throughout the city but none for our catchment highlighted in yellow in screen capture below. Despite the fact that there are more than 14 active development proposals that could bring a potential population increase of 10,000+ residents in our catchment, our many requests for studies have gone un answered. Why? Without these studies developments are reviewed in silos.



- (2) Scarborough Village has been identified as a Neighbourhood Improvement Area and does not have the community services, school or infrastructure capacity to accommodate this proposed. Furthermore, we are adding to a neighbourhood that according to 2016 Census Canada Neighbourhood profile, Scarborough Village has a far greater proportional share (67 vs 44) of the Toronto measure of central tendency for high-rises in this community.



- (3) The following captures concerns raised with regards to impact to our infrastructure.
<https://cliffcrestscarboroughvillagesw.ca/data/documents/CSVSWRA-Response-Letter-reToronto-Water-Follow-Up-February-5-2024.pdf>
- (4) Find a link to “Scarborough’s Yellow Brick Road” a memory book created by the RA to bring attention to what is special in our neighbourhoods, printed copies of the book can also be found in public libraries. QR codes will work if you scan the tour signs and I encourage you to read the student stories submitted towards the end of the book.
<https://cliffcrestscarboroughvillagesw.ca/data/documents/Letter-to-Councillors-Feb-2023Scarborough-Yellow-Brick-Road-CALL-TO-ACTION.pdf>
- (5) See story “Is this what we want for Kingston Road?” In the RA’s newsletter dated March 2022 which raised concerns about retail space in condos sitting empty & still empty today.
https://cliffcrestscarboroughvillagesw.ca/data/documents/17_Newsletter_March_2022.pdf To see other newsletters, <https://cliffcrestscarboroughvillagesw.ca/news/> Community support tab is filled with letters of concern, <https://cliffcrestscarboroughvillagesw.ca/communitysupport/> The heavy snow storms this week hopefully teach city planners to make allowance for snow piles space in our community.
- (6) PHC [Agenda Item History - 2024.PH13.4 \(toronto.ca\)](#), the consultation summary ([Attachment 4: Summary of Consultation \(toronto.ca\)](#))

“Many questions and comments were raised on how the Mid-rise study would affect or interact with existing and under-review policy frameworks (Site-and-Area Specific Policy areas, Secondary Plan areas, Avenue Study areas, natural heritage areas, and Heritage Conservation Districts).” From the outside looking in, it appears no one is looking at the big picture or reality on the ground.

We have learned of a Master Plan that is under development aimed at assessing impact of new developments on Vale of Avoca (Yellow Creek Ravine). What makes a significant landmark like the Bellamy Ravine/Gates Gully different so that similar consideration is left off?
<https://secure.toronto.ca/council/agenda-item.do?item=2023.IE2.9>

Developers continue to move forward with applications at an unprecedented fast pace and the Community is being left

Some other related links:

- More traffic info previously shared with the City, <https://cliffcrestscarboroughvillagesw.ca/data/documents/CSVSWRA-Traffic-Safety-Concerns-re-WindyRidge.pdf>
- More info why this site just 50 meters from the Bluffs needs more scrutiny, <https://cliffcrestscarboroughvillagesw.ca/data/documents/CSVSWRA-Archelological-Follow-up-letter-re-3291Kingston-Rd-March-18-2024.pdf>

MORE INFORMATION IS AVAILABLE IF NEEDED.