

SWANSEA MEWS — 21 Windermere Avenue — Item 2026.PH28.2

In May 2022, a ceiling collapse displaced 108 families from Swansea Mews. They have lived in temporary accommodation for **nearly four years** with a legal right of return. Council votes this week on whether to ratify a process that failed them.

SIX THINGS TO KNOW — AND WHAT THEY VIOLATE

- The mandatory November 20 Open House was held in a school basement hallway — five days' notice, no microphone, no wheelchair access. The City's own Planning Manager said on audio: "The venue was a mistake."

Planning Act ss. 17, 34 Official Plan ss. 3.1.1, 5.5.1 AODA

- The Chair of the Planning and Housing Committee privately declared his settled voting intention six days before he chaired the hearing.

Code of Conduct s. 4 Baker v. Canada [1999] 2 SCR 817

- \$116,417,502 in City concessions committed on a confidential, unverified financial model. The Stage 2 Actions Report Council directed in April 2025 has never been tabled.

Council Policy Executive 225.1 PH20.8 Clause 7 Ont. Reg. 588/17

- Replacement housing has not been confirmed as equivalent in quality to the original stacked townhomes. No bedroom-by-bedroom match to returning household compositions has been disclosed.

Housing Services Act 2011 TCHC Tenant Charter (right of return)

- A publicly available alternative — the Swansea Park Housing Proposal (swanseapark.ca) — was known to TCHC and the Ward Councillor. It was withheld from every consultation the former tenants attended.

Official Plan ss. 3.1.1, 5.5.1 NHSA 2019 s. 4 TCHC Tenant Charter

- No Record of Site Condition has been filed on a site with documented contaminated soil and groundwater. A pre-construction sinkhole appeared on Windermere Avenue in January 2026. A building permit cannot legally issue until the RSC process is complete.

Ont. Reg. 153/04 Environmental Protection Act s. 168.3.1

THE ASK: Defer ratification of the February 2026 Decision Report until the Stage 2 Actions Report — directed by Council in April 2025 and never produced — is tabled.

These families have waited nearly four years. Don't let them down.

Greg Homonylo — ourswanseamatters@gmail.com • SwanseaMatters.com • Ward 4, Parkdale–High Park

COMMUNITY SUBMISSION

Swansea Mews Revitalization — 21 Windermere Avenue

A Failure of Process: The Withholding of a Known Alternative Proposal from Legislatively Required Public Consultation

URGENT — CITY COUNCIL RATIFICATION SCHEDULED MARCH 25–27, 2026

A formal complaint has been filed with the Toronto Integrity Commissioner documenting the procedural failures described in this submission. This submission requests that City Council defer ratification of the February 2026 Decision Report pending: (a) the Integrity Commissioner's review; and (b) completion of the Stage 2 Actions Report and comparative delivery model analysis that Council directed in April 2025 (PH20.8, Clause 7) and that has never been tabled. The Chair of the Planning and Housing Committee that approved this application stated his settled voting intention in a private call six days before the hearing. A verbatim recording of that call has been filed with the Integrity Commissioner. Once Council ratification proceeds, the planning form, density, and use mix are locked in permanently. The community's right to a fair and fully informed process cannot be restored after that point.

Subject site:	21 Windermere Avenue (1–154 Swansea Mews), Ward 4 — Parkdale-High Park, Toronto
TCHC proposal:	649-unit mixed-tenure development (OPA/Zoning approved February 2026; Site Plan pending)
Swansea Park proposal:	Independent alternative prepared by David Peterson, Architect (Fall 2024) — a Toronto architect who has lived in the Swansea neighbourhood for over 20 years and who stated at the February 26, 2026 Committee that the housing authority was the first place he worked after graduation. Prepared on his own initiative. Publicly available at swanseapark.ca .
Known to:	Councillor Gord Perks (Ward 4) and TCHC throughout 2025. Never disclosed to displaced tenants.
Not shown to:	The 108 former tenants of Swansea Mews and the general public. Absent from every Open House, consultation session, and deliberation leading to the February 2026 Decision Report.
Central concern:	The omission of a publicly available, locally prepared alternative from consultations legally required to be inclusive and non-intimidating constitutes a breach of those legislated obligations.
Legal basis:	Ontario Planning Act, 1990, ss. 17, 34; City of Toronto Official Plan ss. 3.1.1, 5.5.1; Municipal Code 415-38; National Housing Strategy Act, 2019, s. 4; Housing Services Act, 2011; TCHC Tenant Charter; AODA; Ontario Human Rights Code
Submitted by:	The Swansea Neighbourhood and SwanseaMatters.com participants. One named individual submits on behalf of this group; others may join as the matter proceeds. 1,001 verified petition signatures within two weeks of the February 26, 2026 Committee meeting.
Date:	March 2026

SYNOPSIS

In May 2022, a structural ceiling collapse displaced 115 households from Swansea Mews, 21 Windermere Avenue. Families have been scattered across the city for nearly four years, dependent on Toronto Community Housing Corporation for temporary accommodation. The urgency to rebuild is real and is shared by this submission.

But urgency does not justify a process that withholds relevant information from the people most affected. This submission documents five compounding failures that have produced a planning application that is materially incomplete and procedurally compromised.

- A credible, publicly available alternative development proposal — the Swansea Park Housing Proposal, prepared by local architect David Peterson (who stated at the February 26 Committee that TCHC was the first place he worked after graduation) and known to Councillor Gord Perks and TCHC throughout 2025 — was withheld from every consultation the former tenants attended. Former tenants spent four years engaging with a single option without knowing another existed.
- The Stage 2 Actions Report that City Council directed in April 2025 (PH20.8, Clause 7) — containing the project budget, financing strategy, delivery model options analysis, and partnership framework — has never been tabled. Council is being asked to ratify planning instruments without the foundational analysis it required.
- The consultation record is not independently verifiable: meeting notes from the September 22, 2025 Zoom were never distributed; the December 2025 Q&A cannot be traced to questions actually asked; the November 20, 2025 Open House was held in a school basement with five business days' notice, no wheelchair access, no public record, and in physical conditions that an independent federal government observer, attending without prompting, described as negligent.
- On February 20, 2026 — six days before chairing the Planning and Housing Committee — Councillor Perks stated in a private recorded call his settled intention to vote in favour of the application, characterised objectors as "manufacturing reasons" why it should not be built, and disclosed pre-decisional planning staff views not yet formally before the Committee. Several community members who received this disclosure concluded deputation was futile and did not proceed. The Chair of the hearing had pre-determined its outcome before a single delegation was heard.
- Four binding legislative obligations — Housing Services Act, 2011; National Housing Strategy Act, 2019, s. 4; AODA; and the Council-directed provincial engagement under PH20.8, Clause 8(a) — remain unaddressed in the February 2026 Decision Report.
- Three material facts were confirmed in writing by City Planning after the hearing: (1) there is no publicly available or producible report underlying the 649-unit density figure — the foundational analysis was completed internally by TCHC and has not been disclosed; (2) the population within 1 km of the site is already projected at 11,693–11,736 from post-2021 approvals, before this application is counted; and (3) 125 The Queensway — the corridor's only full-service grocery — is subject to an active Ontario Land Tribunal appeal that was not disclosed at the February 26 hearing.

The Procedural Failure in One Sentence

A publicly available alternative proposal — prepared by a local architect known to both the Ward Councillor and TCHC, addressing the built-form preferences the community actually expressed — was withheld from every consultation legally required to give participants the information they needed to meaningfully engage. The Chair of the Committee that approved the application had communicated his settled voting intention in a private call six days before the hearing. This is not an oversight. It is a decision. This submission asks for a formal explanation and for the corrective process that should have been offered from the beginning.

SwanseaMatters.com — Community Self-Organization Under Failure of Process

SwanseaMatters.com was assembled by the community in order to ensure that residents had a meaningful opportunity to be heard — a function the formal engagement process had failed to provide. As stated by Greg Homonylo in his deputation to the Planning and Housing Committee on February 26, 2026 (🕒 33:10):

"The community felt they had to get together and build a website and create a petition that was signed by 1,001 people in less than two weeks — that speaks volumes."

With 1,001 verified petition signatures within two weeks of the Committee meeting, SwanseaMatters.com has garnered significant interest from media and elected officials at all levels of government. The site will remain active for as long as required to ensure transparency and equitable representation.

PART ONE: WHAT IS WRONG WITH THE CURRENT PROCESS

1.1 THE CORE GOVERNANCE FAILURE: THE MISSING ACTIONS REPORT

City Council's April 2025 decision (PH20.8, Clause 7) required both a Stage 2 Actions Report and a Planning Report to be tabled together in Q4 2025. Only the Planning Report arrived. The Actions Report — which was to contain the project budget, financing strategy, delivery model options analysis, procurement plan, and partnership framework — has never been tabled.

Council is now being asked to ratify planning instruments that lock in development form, density, and use mix without having reviewed any of these foundational documents. The February 2026 report's reference to a future "report back in 2026 with further details on the financial impact" is a deferral of Council's directed analysis, not compliance with it.

It is within this missing Actions Report that the delivery model analysis — the formal comparison of TCHC-only development against alternatives including the Swansea Park model — was supposed to appear. Its absence means that Council is not only approving without a budget; it is approving without ever having seen the range of options it directed staff to assess.

Applicable law: *PH20.8, Clause 7 (Council direction, April 2025); Council Policy Executive 225.1 (verified financing required before rezoning); Ontario Regulation 588/17 on asset management; National Housing Strategy Act, 2019, objective 1.2 (fiscal sustainability).*

The Governance Gap

The Actions Report Council required has not been tabled. Both proposals remain unassessed against financial and delivery criteria. No approval should proceed until that analysis exists. The community is not asking for delay — it is asking for the process Council itself prescribed.

1.2 THE CONSULTATIONS THAT FAILED THE LEGISLATED STANDARD

Ontario's Planning Act, 1990, ss. 17 and 34 require that statutory public meetings and Open Houses provide notice and information sufficient for meaningful participation. The City of Toronto's Official Plan ss. 3.1.1 and 5.5.1 require that residents have the opportunity to shape built form outcomes — not merely respond to decisions already made. The Swansea Mews consultation process failed this standard at every documented stage.

1.2A The September 22, 2025 Zoom: A Consultation Milestone That Cannot Be Verified

The September 22, 2025 Zoom webinar was represented as the Community Consultation Milestone required before a planning application could be submitted. Approximately 83 participants attended. The session generated

substantive questions across eight documented themes: height, density, and built form; planning context and process; the engagement process itself; housing tenure and unit mix; community and environmental infrastructure; traffic and parking; demolition and construction; and open space and amenities.

The meeting notes from this session were never distributed to attendees. They were never shared for verification, review, or correction. Community members had no opportunity to confirm that their questions were recorded accurately, completely, or in appropriate context.

Three months later, in December 2025, TCHC published a Q&A document presented as a response to the September meeting. The Q&A does not reference specific questions, timestamps, or verbatim dialogue. It provides polished, policy-oriented responses that cannot be traced to what was actually asked. Because the meeting notes were never shared, there is no baseline against which to evaluate whether the Q&A reflects the community's concerns or a subsequent institutional narrative. The evidentiary chain between what the community asked and what was later answered is broken.

Applicable law: *Planning Act, 1990, ss. 17, 34; Official Plan ss. 3.1.1, 5.5.1; Municipal Code 415-38; NHSA, 2019, s. 4 (meaningful participation as funding condition).*

1.2B The November 20, 2025 Open House: Five Days' Notice, No Access, No Record

The November 20, 2025 Open House was given five business days' notice. Flyers were hand-delivered to residents within 120 metres because Canada Post timelines could not be met. Former Swansea Mews residents — rehoused by TCHC at locations across the city — were not given meaningful advance notice to attend. The timeline was justified internally by a claimed federal housing funding deadline. The office of the local federal Member of Parliament has confirmed that no such deadline existed or exists. Housing funding requests are open-ended and ongoing. A statutory consultation right was degraded on the basis of a timeline that was not real.

The meeting was held in the school basement — a children's play area with toys and signage still present — and in the adjacent hallway corridor, with 15 display panels on easels. The building was not identifiable from the exterior. There was no wheelchair access. The elevator was not working. Several attendees with mobility needs had to leave in frustration.

Physical arrangement: During the Q&A session, Councillor Perks stood at the front with City staff, TCHC representatives, and Bousfields planning consultants arranged in a semi-circle behind him, facing the audience. The institutional representatives significantly outnumbered the community members who had come to ask questions. Former tenants have consistently described the arrangement as creating a visible and uncomfortable power imbalance — more consistent with an enforcement or disciplinary proceeding than an open public consultation. A staff member from a federal government office who attended in an independent observer capacity described the session, without prompting, as negligent, and noted that the tension in the room and the energy created by the physical arrangement were clear and noticeable. This account is recorded as witnessed.

Former tenants are displaced, dependent on TCHC for their current accommodation, and acutely aware of the power that institution holds over their housing future. Conducting a mandated consultation for that community in an environment described by an independent professional observer as negligent is not an administrative failing. It is a governance failure.

Additionally, multiple witnesses — including Penny Fischer and other former residents who attended — confirmed that residents were told at the Open House that no changes to the proposal were possible. This made the exercise one of information delivery, not genuine consultation.

Applicable law: *AODA (accessibility); Ontario Human Rights Code (non-discriminatory consultation); Planning Act, 1990, ss. 17, 34 (meaningful notice and participation); Official Plan s. 3.1.1; TCHC Tenant Charter (dignity and respect; meaningful participation).*

Audio Evidence — Windermere Avenue, November 20, 2025

A youth who had just exited the Open House struck up a brief conversation with a neighbour on Windermere Avenue. Both voices are altered in the recording to preserve their anonymity and protect their identities. "Did you go to this revitalization thing?" "Ya." "Was it any good?" "What?" "Was it any good?" "Ah, it's a lot of talking and people walking around and boards with images about their plan." "What did you think of it?" "I just thought that it was the same thing as Regent Park." [break / edit] "How do you think your voice could be heard?" "I don't think it can." His spontaneous comparison to Regent Park is not a compliment: it is a former resident's unprompted assessment that a template is being imposed on a neighbourhood where it does not belong. His answer to the final question — "I don't think it can" — is the plainest possible account of what this process delivered to those it was supposed to serve.

1.2C The Councillor's Newsletters: A Pattern of Selective Framing

Councillor Gord Perks issued four public newsletters pertaining to the Swansea Mews process: September 25, November 27, 2025, and February 19 and 26, 2026. These are his own public record of the process. Read against the factual record, they reveal a consistent pattern of selective framing, material omissions, and descriptions inconsistent with the Decision Report. No newsletter mentions the Swansea Park Housing Proposal.

- September 25, 2025: Describes the September 22 Zoom as launching a process to "ensure it reflects the community's needs" — while the design (35- and 20-storey towers, 673 units) had been established in the IDP approved by Council five months earlier. Presents a predetermined form as the beginning of collaborative planning.
- November 27, 2025 (post-Open House): The Open House on November 20 was presented to attendees using 673 units (154 replacement + 519 new). The post-Open House newsletter, dated November 27, reported 649 units (154 replacement + 495 new) — a reduction of 24 units with no explanation, no acknowledgment of any change, and no notice to the community that the figure shown at the Open House had been revised. The newsletter otherwise reproduced the same language as the November 20 text, describing former tenants as having "spoke passionately" — sanitising documented expressions of concern and dissatisfaction.
- February 19, 2026: States the Decision Report "outlines staff's recommendations for addressing concerns." The report lists eleven community concerns. Not one receives a substantive response. The description is not consistent with the report's actual contents. The newsletter also refers to meetings with "members of community associations" (plural); City Planning has confirmed these were meetings with a single organisation — the Swansea Area Ratepayers Association, represented by Veronica Wynn.
- February 26, 2026 (sent same evening as the vote): Thanks residents for participating in "community engagement processes" without acknowledging that the Swansea Mews Tenant Leadership Committee representative, Penny Fischer, stated to the Committee minutes earlier that the majority of tenants are opposed to the current plan. The newsletter was sent after that testimony, on the same evening, with no acknowledgment of that opposition.

These newsletters demonstrate a consistent and documentable pattern: a predetermined outcome presented as collaborative, dissatisfaction characterised as passion, unanswered concerns described as addressed, and an available alternative never mentioned.

Applicable law: *TCHC Tenant Charter (right to complete and accurate information); Code of Conduct s. 4 (no misleading by action or omission).*

1.2D The February 26, 2026 Committee — Advocacy from the Chair

The verbatim transcript of the February 26, 2026 Planning and Housing Committee establishes that the Chair's conduct of the post-deputation Q&A and his closing statement before the vote constitute advocacy from the chair's position, not neutral governance.

The hearing was held at minimum quorum: four of six Committee members were present. Councillors Bradford and Myers were absent. Councillor Matlow did not vote in favour. The Committee approved the application on a split vote. The four members present had no way of knowing what was being withheld from them: that a known alternative existed; that the Chair had pre-determined his vote six days earlier; or that the Stage 2 Actions Report Council had directed as a prerequisite had never been tabled.

🕒 2:34:47 — Design consultation closed without disclosing the alternative: Chair Perks asked staff whether community feedback had caused the density to move away from the neighbourhood. Staff confirmed it. What was not disclosed: the alteration was positional only — the taller building moved from one corner to another. Unit count, density, shadow footprint, school pressure, and infrastructure demand are unchanged. The Swansea Park alternative — a fundamentally different design known to both Chair Perks and TCHC since Fall 2024 — was not mentioned. The exchange produced a committee record suggesting community feedback had been meaningfully incorporated. It had not.

🕒 2:38:52 — Closing advocacy before the vote: Before calling the vote, Chair Perks stated it was "not just with clear comfort, but actual excitement" that he would support the proposal and hoped all committee members and all of Council would do the same. He characterised the tenants as having "participated in designing this" — a direct factual mischaracterisation. Penny Fischer had testified minutes earlier, on the public record, that the majority of tenants oppose the plan and that "we were told what the plan would be."

Penny Fischer — Former Swansea Mews Resident / Tenant Leadership Committee (🕒 2:13:29): "We were not asked whether we wanted a 35-storey building or a 16-storey building or stacked townhouses with very limited green space. We were told what the plan would be... The people making the decision here for the plans are not the people who are going to live there. We ask, before you decide, that you ask yourselves: if you would live there."

Fischer's testimony, on the public record, directly contradicts the Chair's characterisation of tenants as having "participated in designing this."

1.2E The February 20, 2026 Private Call — Pre-Determination Before the Hearing

On Friday afternoon, February 20, 2026 — six days before he chaired the Planning and Housing Committee — Councillor Perks participated in a private recorded video call with Greg Homonylo, a nearby resident who had written to the Councillor on February 10 explicitly to explore collaborative engagement pathways and "not to block the need for more affordable housing."

The call has been transcribed in full. The following exchanges are drawn from the verbatim transcript and are material to Council's consideration of the process that produced the February 2026 Committee approval.

Councillor Perks — February 20, 2026 Private Call (🕒 34:34): "So, I'm gonna... cards on the table, I am going to be supporting a project that has this number of units, or, you know, give or take 5 or 10, on that site. I'm gonna be supporting that for all the reasons that I've laid out in our conversation."

This statement was made on a Friday afternoon, six days before the hearing, to a single community member outside the formal public process. It is a settled, first-person commitment — not a tentative view. Several community members who received this disclosure concluded deputation was futile and did not proceed. The Chair had pre-determined his vote before a single delegation was heard.

Councillor Perks — February 20, 2026 Private Call (🕒 13:50): "There were people there who were just manufacturing reasons why this shouldn't be built at all. And it didn't go well. Like, I've done hundreds of these. This was one of the most fraught and hostile."

This characterisation was communicated privately on the Friday before the hearing, with no working day available for the community to respond before Monday — two business days before the Committee sat. A presiding officer who has privately concluded that those opposing an application are manufacturing bad-faith objections cannot be said to bring an open mind to their delegations.

The pre-determination doctrine — affirmed in *Baker v. Canada* [1999] 2 SCR 817 and in Ontario administrative law generally — prohibits a decision-maker from arriving at and communicating a settled voting intention before a quasi-judicial hearing has concluded. The February 26 Committee hearing that followed was procedurally compromised from the outset: the Chair had already committed to an outcome before a single deputation was heard. The community members who were told this on the Friday afternoon before the hearing had no working day in which to regroup, seek advice, or reconsider whether to proceed.

The Consultation Failure — Summary

The September 22, 2025 Zoom meeting notes were never distributed or verified, breaking the evidentiary chain between what the community asked and what was later answered. The November 20, 2025 Open House was held in a school basement with five business days' notice, no wheelchair access, no public record, no exterior signage, and in a physical arrangement described by an independent observer as negligent and by former tenants as more consistent with an enforcement proceeding than a public consultation. The Chair of the Committee that approved the application had pre-determined his vote six days before the hearing and communicated that determination privately. Neither consultation meets the standard required by Ontario Planning Act, 1990, ss. 17 and 34, or Official Plan s. 3.1.1.

1.2F The Density Figure Has No Publicly Available Foundation — Three Post-Hearing Disclosures

On March 3, 2026 — six days after the Planning and Housing Committee approved the application — City Planning Senior Planner Doris Ho confirmed in writing that there is no publicly available or producible report underlying the density figure that became 649 units. The foundational analysis was completed internally by TCHC through its commissioned consultants (Urban Strategies) and has not been disclosed. The range of 550–700 units cited to justify the proposal's scale was not derived from any independently verifiable planning analysis. This confirmation was provided only after persistent written inquiry by community representatives over the ten weeks preceding the hearing; it was not volunteered, and it was not disclosed to Committee members at the February 26 hearing.

Also confirmed in writing by City Planning after the hearing: the population within 1 km of 21 Windermere Avenue was 10,498 in the 2021 Census. City Planning projects that figure will reach 11,693–11,736 from developments approved since 2021 — before the Swansea Mews application adds a single unit. This means the corridor has already absorbed, or has approved in the planning pipeline, growth that will bring its immediate population to a level consistent with the most densely occupied districts in the city. No service capacity analysis — for transit, school enrolment, or grocery access — was tabled at or before the February 26 hearing.

A third undisclosed fact: 125 The Queensway — the only full-service grocery store serving the Queensway/Windermere corridor — is currently subject to an active Ontario Land Tribunal appeal on a proposed conversion from General Employment Area to Mixed Use for seven buildings. This was known to City staff at the time of the February 26 hearing and was not disclosed to Committee members. The conversion, if approved at

OLT, would eliminate the corridor's sole grocery anchor. The cumulative service risk of approving further large-scale density in a corridor already at this population threshold, without a grocery anchor, was not assessed.

The four private market condominium towers already standing in immediate proximity to the intersection — 15 Windermere Avenue (Windermere by the Lake, 27 storeys, 306 units, 2007); 103 The Queensway (NXT I, 29 storeys, 464 units, 2011); 105 The Queensway (NXT II, 34 storeys, 525 units, 2013); and 34 Southport Street (Southport, 27 and 30 storeys, 625+ units, under development, with a further application for an additional tower of approximately 30 storeys now before the City) — represent approximately 1,920+ private market units. Not one was required to rehouse displaced low-income families or provide a grocery anchor as a condition of approval. They are not planning precedent for imposing equivalent density at social housing density ratios on a community of displaced tenants. They are the context that makes service capacity analysis essential before any further approval proceeds.

Applicable law: *City of Toronto Official Plan ss. 3.1.1, 5.5.1; NHTSA 2019, s. 4; Planning Act, 1990, ss. 17, 34; Council Policy Executive 225.1.*

What This Establishes

The unit count that defines this proposal's scale has no publicly producible analytical foundation. The corridor it proposes to densify is already at a population threshold that has not triggered any service capacity review. The only full-service grocery in that corridor is under active threat at the OLT — a material fact not disclosed at the hearing. These three facts were confirmed in writing by City Planning after the hearing, not before it. Council is being asked to ratify a scale and density figure that rests on undisclosed internal analysis, in a corridor that was not assessed for service capacity, in a neighbourhood whose grocery anchor is subject to an active appeal. That is not a sound basis for an irrevocable planning decision.

1.2G The Density Rationale Fails on Its Own Terms — A Substantive Assessment

The process failures documented above are compounded by a substantive failure: the density proposed for 21 Windermere cannot be justified by the rationales offered in its support. This section addresses those rationales directly, drawing on wait-list mathematics, the financing structure disclosed in the February 20 private call, the planning precedent argument advanced at the February 26 Committee, and the cumulative service capacity of the corridor. On each ground, the density figure does not hold.

The Wait-List Mathematics Do Not Justify the Density Premium

There are 104,904 households on Toronto's Centralized Waiting List for Rent-Geared-to-Income (RGI) housing as of Q3 2025 — the highest figure ever recorded. The list is growing at an average of approximately 4,400 households per year. By the time 21 Windermere Avenue reaches occupancy — realistically no earlier than 2028–2029 — the projected wait list will stand at approximately 118,000 households.

Both the TCHC proposal and the Swansea Park proposal include the same 154 mandatory RGI replacement units for the families displaced since 2022. The meaningful comparison is therefore the net new units each proposal adds above that replacement baseline — and what that difference actually means against the scale of the housing need being invoked to justify it.

Scenario	Swansea Park net new*	TCHC net new*	Difference	Difference as % of projected 2028 wait list†	TCHC net new as % of projected 2028 wait list
Low end (331 total)	177	495	318 units	0.269%	0.419%
Mid-point (396 total)	242	495	253 units	0.214%	0.419%

Scenario	Swansea Park net new*	TCHC net new*	Difference	Difference as % of projected 2028 wait list†	TCHC net new as % of projected 2028 wait list
High end (461 total)	307	495	188 units	0.159%	0.419%

* Net new = total units minus the 154 mandatory RGI replacement units included in both proposals. † Projected 2028 wait list of 118,110 based on average annual growth of 4,402 households (2019–2025 Q3, City of Toronto data). Earliest realistic occupancy: approximately 2028–2029.

The difference between the two proposals — at its widest, 318 units — represents 0.269 per cent of the projected 2028 wait list. At its narrowest, 188 units, the difference falls to 0.159 per cent. The entire TCHC net new contribution of 495 units represents 0.419 per cent. These are not numbers that resolve a housing crisis. What they do determine is whether 154 families return to a 35-storey tower or to a mid-rise community at human scale with ground-level outdoor space, courtyards, and a naturalized park.

The Density Finances the TCHC Model — The Community Pays the Price

Councillor Perks stated privately on February 20, 2026 that the density is driven by a financing requirement: for every RGI unit, approximately three market units are needed to make the mortgage viable. The 495 net new units are not primarily a housing crisis response. They are the financial mechanism that makes the TCHC cross-subsidy model work — and the 154 returning families, along with their neighbourhood, are the ones absorbing the consequences of that model.

The Swansea Park proposal uses a cooperative tenure structure eligible for the Federal Co-operative Housing Development Fund, which does not carry the same market-unit cross-subsidy requirement. This alternative financing model was never disclosed to the community. It was never evaluated in the Stage 2 Actions Report that City Council directed in April 2025 and which was never tabled. It was never placed before the 154 displaced households who are being told that towers are the only viable answer.

The Precedent Argument Is Logically Inverted

At the February 26, 2026 Committee, Councillor Perks — as Chair — asked City Planning staff whether they had reviewed densities "immediately to the south and to the west of the site" (🕒 2:38:16). Staff confirmed adjacent developments of similar height and density exist. The implied conclusion was that those approvals justify the proposed 35-storey tower at 21 Windermere. They do not.

Four private market towers stand in immediate proximity to the Queensway/Windermere intersection, all built by Cresford Developments:

Development	Height / Units / Completed	Community Conditions Required
15 Windermere Ave (Windermere by the Lake)	27 storeys 306 units 2007	None
103 The Queensway (NXT I)	29 storeys 464 units 2011	Daycare contribution (s.37, arm's-length negotiation with private developer)
105 The Queensway (NXT II)	34 storeys 525 units 2013	None
34 Southport Street (Southport — ongoing; further ~30-storey tower in application)	27 & 30 storeys 625+ units Ongoing	None
TOTAL — private market units at this intersection	~1,920+ units	No development required social housing replacement or community service provision

These four developments account for approximately 1,920+ units within walking distance of 21 Windermere. The planning conditions attached to those approvals were negotiated at arm's length with private developers who

sought density permissions on land they owned. That is how the planning system is designed to work with commercial developers.

The existence of those towers does not constitute a planning rationale for any subsequent application on a different site with different ownership, different obligations, and a different population. Using them as precedent conflates two fundamentally different planning contexts — a private developer seeking profit with a public housing authority discharging a statutory obligation to displaced tenants.

The logical inversion: The presence of 1,920+ private market units already in this corridor is the strongest available argument for a cumulative service analysis before approving further density — not a justification for proceeding without one. A full-service grocery, a single constrained bus route, and a school already at capacity were in place before those towers were built. They remain the same infrastructure today.

The Cumulative Service Deficit — Three Named Infrastructure Failures

The four Cresford towers plus the proposed 649 units at 21 Windermere represent over 2,500 units at this single intersection. More than 1,200 additional units are planned for the Southport lands in the same immediate area. The service infrastructure serving this corridor has not grown commensurately with the density already approved, and no cumulative analysis has been presented to the community or to the Committee.

Three specific deficits are already on the record:

- **Transit:** Route 77 Runnymede is the only TTC route serving the area between High Park and the Humber River north of The Queensway. It is constricted due to the route specifics, and cannot be expected to manage the load being contemplated. The transportation study filed with the application does not account for combined ridership pressure from the Swansea Mews application and the Southport lands together. Multiple former residents raised Route 77 in their deputations as already inadequate for existing demand. This testimony is on the public record. It was not addressed.
- **School capacity:** Swansea Public School sits directly adjacent to the site with approximately 950 students enrolled. Standard planning estimates project 138–198 additional children from this development alone — a 15–21 per cent enrolment increase. The TDSB currently has 84.1 per cent of its school buildings below state of good repair and had class size caps removed under provincial supervision in 2025–26. No school board capacity review was conducted or disclosed at any stage of this process.
- **Grocery access:** The Sobeys at 125 The Queensway — the only nearby full-service grocery anchor — is currently subject to an active Ontario Land Tribunal appeal on a proposed conversion to mixed-use. This was known to City staff at the time of the vote and was not disclosed to Committee members. The conversion, if approved at OLT, would eliminate the corridor's sole grocery anchor at the precise moment the corridor's population is proposed to increase further.

What the Density Analysis Establishes

The density premium over the alternative proposal represents less than 0.3 per cent of the projected 2028 wait list — a margin that will not register as a meaningful response to the housing crisis by the time the building opens. The density is not a housing crisis intervention. It is the financial mechanism the TCHC cross-subsidy model requires — confirmed by the Ward Councillor in a private recorded call. The private market towers cited as precedent were negotiated at arm's length with commercial developers and imposed no social housing obligations; they are not a valid planning rationale for this application. And the corridor's infrastructure — one bus route, one school, one grocery — has not grown since those towers were built, while more than 2,500 units have been

added or are in planning. Full servicing is a prerequisite of this development, not an afterthought. Council is entitled to the honest answer before it votes.

Applicable law: *Official Plan ss. 3.1.1, 3.2.2, 5.5.1 (complete communities; livability; planning decisions must be based on complete information); Growing Up Guidelines 2020; Complete Street Guidelines 2017; Growth Plan policy 3.2.2.4; Provincial Policy Statement 2024; NHSA 2019, s. 4 (fiscal sustainability and service adequacy); Planning Act, 1990, ss. 17, 34.*

1.3 THIRTEEN MATERIAL DEFICIENCIES IN THE FEBRUARY 2026 DECISION REPORT

Beyond the consultation failure, the February 2026 Decision Report contains material deficiencies across governance, design, engagement, legislation, and finance. The 649-unit total is TCHC Board-approved and is not challenged here. All other findings are:

DEFICIENCY	DESCRIPTION	STATUS
Stage 2 Actions Report absent	No project budget, delivery model, or procurement strategy tabled before Council, contrary to PH20.8, Clause 7 (Council direction, April 2025) and Council Policy Executive 225.1.	CRITICAL
Block structure diverges from IDP	3-block plan became 2 buildings; Block C and internal road network abandoned without rationale or community disclosure.	CRITICAL
Community space shortfall	1,204 sq m delivered vs. 1,400–1,860 sq m committed in the IDP. Not acknowledged in the report.	CRITICAL
Government engagement unreported	No evidence of mandated provincial/federal engagement; \$116.4M in City incentives unmatched by confirmed commitments.	CRITICAL
Unit mix: zero bachelor units	No studio or bachelor unit in a 649-unit transit-corridor development — unexplained and unjustified.	CRITICAL
Unit mix: large-family shortfall	Approximately 33 fewer 4- and 5-bedroom units than City's Growing Up Guidelines 2020 require.	CRITICAL
RGI bedroom distribution undisclosed	154 replacement units confirmed; no bedroom breakdown by household size. Cannot confirm every returning household has a unit they can occupy.	CRITICAL
Engagement record unauthenticated	Eleven community concerns listed; not one substantively addressed. September 22 meeting notes never distributed. December 2025 Q&A not traceable to questions raised.	CRITICAL
Building management accountability	Community's most urgent concern — rooted in the catastrophic maintenance failure of 2022 — acknowledged and not addressed.	CRITICAL
December 2 unit lottery	Unit selection by random lottery; former tenants treated as interchangeable rather than as a defined community with documented household compositions.	CRITICAL
Legislative compliance gaps	Housing Services Act, 2011; NHSA, 2019, s. 4; AODA accessible unit disclosure; PH20.8, Clause 8(a) provincial engagement — all unaddressed.	CRITICAL
Funding gap: \$58M–\$108M unassessed	CMHC Affordable Housing Fund, MLI Select, federal cooperative housing fund, MAHA grants, mass timber incentives — none confirmed or formally assessed.	CRITICAL
No alternative delivery model assessed	Co-operative, non-profit, and private partnership models — Council-directed analysis under PH20.8, Clause 7 — never conducted.	CRITICAL

1.4 WHO CAN ACTUALLY RETURN? THE UNIT MIX PROBLEM

The 649-unit program contains zero bachelor or studio units — an absence neither acknowledged nor justified in the February 2026 report. It provides approximately 33 fewer large-family units (4- and 5-bedroom) than the City's Growing Up Guidelines 2020 require. There is no bedroom-type breakdown of the 154 RGI replacement units reserved for returning families.

These are not abstract deficiencies. The families displaced in 2022 lost a ground-oriented, family-scale community of stacked townhomes. They are being offered a tower program whose unit mix has not been demonstrated to reflect their documented household compositions. The December 2, 2025 unit allocation lottery assigned units by random draw. A needs-based matching process — aligning assignments to household size, accessibility requirements, and documented preferences — is the standard in comparable revitalizations including Regent Park (2005), Lawrence Heights (2010), and Don Somerville (2023).

Applicable law: *City of Toronto Growing Up Guidelines 2020; AODA (accessible unit disclosure); TCHC Tenant Charter (right to return; needs-based allocation); HSA, 2011 (quality equivalency).*

The Unanswerable Question

With no bedroom breakdown of the 154 RGI units and no documented survey of the 108 returning households' current compositions, it cannot be confirmed that every family will have a unit they can actually live in. This is not a planning abstraction. It is a rights question.

1.5 SCALE, DENSITY, AND NEIGHBOURHOOD LIVABILITY

The Swansea Mews site is 5.24 acres. At 649 units and the City's average household size of 2.4 persons, the proposed development would place approximately 1,558 people on that site — a site density of roughly 73,500 people per square kilometre. For context:

- The City of Toronto as a whole has a density of 4,428 people per square kilometre (2021 Census). The proposed development would operate at approximately 16.6 times the city's average density.
- The Bay Street Corridor — downtown Toronto's most intensively developed high-rise district — has a density in the range of 20,000 to 25,000 people per square kilometre. The proposed Swansea Mews site density would be approximately three times that, on a 5.24-acre site bordering an Environmentally Significant Area.
- Three additional developments in the immediate area will add approximately 1,200 further units — a cumulative impact omitted entirely from the traffic study.

School capacity: Swansea Junior and Senior Public School sits directly adjacent to the site with approximately 950 students enrolled. Standard Toronto planning estimates project between 138 and 198 additional children — a 15 to 21 percent enrolment increase from this single development. The TDSB currently has 84.1 percent of its school buildings below state of good repair and had class size caps removed under provincial supervision in 2025–26. No school board capacity review was disclosed to the community at any stage.

Applicable law: *Official Plan ss. 3.1.1, 3.2.2, 5.5.1 (complete communities; livability); Growing Up Guidelines 2020; Complete Street Guidelines 2017; Growth Plan policy 3.2.2.4; Provincial Policy Statement 2024.*

1.6 FUNDING LEFT ON THE TABLE: \$58M–\$108M UNASSESSED

PROGRAM	POTENTIAL VALUE	TCHC STATUS	NOTE
CMHC Affordable Housing Fund	\$10M–\$30M	Unconfirmed	Requires NHSA, 2019, s. 4 meaningful participation. Deficient consultation jeopardises eligibility.

PROGRAM	POTENTIAL VALUE	TCHC STATUS	NOTE
Federal Co-operative Housing Development Fund	\$5M–\$15M	Not eligible (TCHC model)	Requires cooperative component. Swansea Park model invites one through RFP procurement.
MLI Select Mortgage Insurance	\$5M–\$15M	Not assessed	Mid-rise with accessibility commitments likely qualifies; not assessed for either proposal.
Ontario MAHA Grants	\$10M–\$20M	Not pursued	Mandated provincial engagement (PH20.8, Cl. 8(a)) still unreported.
Mass Timber / Green Building Incentives	\$2M–\$8M	Not applicable (TCHC)	Swansea Park mass timber primary structure qualifies. TCHC proposal does not.
Embodied Carbon Credits	\$1M–\$5M	Not addressed	Reclaimed materials and mass timber reduce embodied carbon; eligible under emerging federal/provincial programs.

1.7 FOUR BINDING LEGISLATIVE OBLIGATIONS NOT ADDRESSED

Housing Services Act, 2011 (Ontario): Replacement housing must be of at least equivalent quality to the housing demolished. The February 2026 report does not confirm quality equivalency between the proposed high-rise units and the original stacked townhomes.

National Housing Strategy Act, 2019, s. 4 (Federal): Meaningful participation of persons with lived experience of housing need is a direct condition of CMHC Affordable Housing Fund and Build Canada Homes funding eligibility. A consultation that presents a single option while concealing the existence of a publicly available alternative does not satisfy this standard. Federal funding eligibility is directly at risk.

AODA and Ontario Human Rights Code: Both proposals must disclose the number of accessible and adaptable dwelling units disaggregated by tenure type. The February 2026 report confirms 21 accessible parking spaces but does not disclose accessible unit counts.

Council-Directed Provincial Engagement (PH20.8, Clause 8(a)): Council directed that the IDP report be forwarded to the Ontario Minister of Municipal Affairs and Housing to request program and financial support. There is no evidence this was done. This obligation applies regardless of which model is adopted.

1.8 TCHC TENANT CHARTER: A PARALLEL FAILURE

- **Right to Information:** Withholding the Swansea Park alternative from all consultations while TCHC was aware of its existence is inconsistent with the Charter obligation to provide complete, accurate, and timely information about decisions affecting tenants' housing.
- **Right to Meaningful Participation:** A consultation process that presents a single option to displaced tenants, in which the range of choices was narrowed before participants arrived, does not constitute meaningful participation.
- **Right to Dignity and Respect:** The physical organisation of the November 20 Open House — TCHC staff forming part of a semi-circle of institutional representatives facing displaced tenants in a basement play area independently described as negligent — must be accounted for under this obligation.
- **Right to Return with Needs-Based Allocation:** The right-to-return commitment is given operational meaning only when unit allocation accounts for household composition, family size, and individual need. A lottery does not meet this standard.
- **Right to Raise Concerns Without Reprisal:** Eleven community concerns are listed in the February 2026 report. Not one receives a substantive response.

PART TWO: THE SWANSEA PARK PROPOSAL — WHAT WAS WITHHELD

The Swansea Park Housing Proposal was prepared in Fall 2024 by David Peterson, a Toronto architect who has lived in the Swansea neighbourhood for over 20 years and who stated at the February 26, 2026 Committee that the housing authority was the first place he worked after graduation. The proposal was not commissioned. It was prepared on his own initiative by someone who knows this site, this community, and this institution from the inside. A dedicated public website was built to share the proposal and invite input.

The former tenants have not seen it — because it was not placed before them at any consultation, Open House, or deliberation leading to the February 2026 report.

The Nature of This Section

The Swansea Park proposal is presented here as information that was withheld, not as a preferred alternative. The community's position is that both proposals must be formally presented to former tenants and formally assessed in the Stage 2 Actions Report before any decision is made. The community does not prejudge the outcome.

2.1 DESIGN PHILOSOPHY: A DIFFERENT STARTING POINT

Where the TCHC proposal begins with buildings — a 35-storey tower and an 8-storey building — and works inward, the Swansea Park proposal begins with a naturalized public park at the heart of the site and organizes the residential community around it. The design draws on urbanist Jan Gehl's principle: "First life, then spaces, then buildings — the other way around never works."

For the former tenants of Swansea Mews — a community of stacked townhomes with porches, courtyards, and ground-level access to outdoor space — this difference is not abstract. The community's stated preference for a townhouse-oriented built form, listed in the February 2026 report among eleven concerns that received no response, finds a direct answer in the mid-rise, porch-and-courtyard model the Swansea Park proposal describes.

2.2 PROJECT STATISTICS

PARAMETER	SWANSEA PARK PROPOSAL — David Peterson Architect, Fall 2024
Location	21 Windermere Avenue, Toronto — the same site as the TCHC proposal
Site area	22,750 m ²
Building coverage	4,491 m ² (20% of site) — 80% open and landscape space
Landscape area	13,650 m ² (60%) including restored pond, central park, and reclaimed material features
Number of buildings	14 mid-rise residential buildings
Building heights	6, 8, and 10 storeys — no towers
Units (current concept)	331 units
Projected unit capacity	461 units with density optimization
Average unit size	70 m ²
Primary structure	Mass timber
Sustainability	Reclaimed brick paving; reclaimed concrete landscape; solar PV; restored pond and wetland; native species canopy

PARAMETER	SWANSEA PARK PROPOSAL — David Peterson Architect, Fall 2024
Procurement model	Public RFP — community concept as competitive bid brief; enables cooperative tenure options and federal co-op housing fund access
Status	Publicly available at swanseapark.ca. Known to Councillor Gord Perks and TCHC. Never formally presented to former tenants, the broader community, or the Planning and Housing Committee.

PART THREE: THE TWO PROPOSALS COMPARED

The following comparison is not a ranking. It is the comparison that the former tenants and community should have been given the opportunity to consider in consultation, and that the Stage 2 Actions Report — directed by Council and never conducted — must now formally assess.

DIMENSION	TCHC PROPOSAL — February 2026	SWANSEA PARK PROPOSAL — David Peterson Architect, Fall 2024
Total units	649 (TCHC Board approved)	331 proposed; 461 projected with optimization
Building typology	2 buildings: 35-storey tower + 8-storey building	14 mid-rise buildings: 6, 8, and 10 storeys
Tallest structure	35 storeys	10 storeys
Site coverage	Not disclosed in report	20% built; 80% open and landscape space
Open / landscape space	POPS courtyard; no formal parkland	60% landscape (13,650 m ²); restored pond; naturalized central park
Ground-level community form	None	Porches and courtyards at every building; human-scale streetscape throughout
Community space	1,204 sq m — below IDP minimum of 1,400–1,860 sq m	Central park + canopy + porches: multiple programmable public spaces
Civic amenity	None	Public wood canopy at Queensway/Windermere: markets, events, community education
Sustainability approach	TGS Tier 2 referenced; specifics deferred to Site Plan	Mass timber primary structure; solar PV; reclaimed brick and concrete; restored wetland
Tenure and governance	TCHC landlord model only; no alternatives assessed	Mixed tenure; RFP platform inviting cooperative delivery option and federal co-op fund access
Procurement model	TCHC-only; no market sounding or competitive process	RFP-based; invites competitive innovation; community concept as bid brief
Townhouse / ground-oriented form	None — tower model only	Mid-rise modular blocks with porches and courtyards; closer to original stacked townhouse form
Consultation status	Former tenants and community not shown an alternative exists	Publicly available at swanseapark.ca; known to Councillor Perks and TCHC; not shared with former tenants at any stage

What This Comparison Establishes

These are not variations on a theme. They are fundamentally different planning approaches — in built form, open space, tenure, sustainability, procurement, and community character. The community had a right to see both. It did not. That right is established under Ontario Planning Act,

1990, ss. 17 and 34; Official Plan ss. 3.1.1 and 5.5.1; National Housing Strategy Act, 2019, s. 4; and the TCHC Tenant Charter.

PART FOUR: WHAT THE COMMUNITY IS ASKING FOR

This submission does not ask that the TCHC proposal be rejected. It asks for a process that is fair, complete, and lawful — the process that Council directed and that was not delivered.

ACTIONS REQUESTED

Action 1 — Defer Ratification Pending Stage 2 Actions Report and Formal Review

City Council should defer ratification of the February 2026 Decision Report until: (a) the Stage 2 Actions Report — including a formal comparative assessment of both the TCHC and Swansea Park delivery models — is tabled and approved, as Council itself directed in April 2025; and (b) the formal complaint filed with the Toronto Integrity Commissioner has been reviewed. Council is being asked to ratify an approval produced by a process in which the Chair had pre-determined his vote six days before the hearing. That is material information for any Council member voting on ratification.

Legal basis: *PH20.8, Clause 7 (Council direction, April 2025); Council Policy Executive 225.1; Ontario Regulation 588/17; City of Toronto Act, 2006.*

Action 2 — Enter Both Proposals into the Planning Record

The Swansea Park proposal and this Submission must be formally entered into the planning record. A formal written explanation must be required from TCHC and the Ward Councillor's office of why a publicly available alternative proposal was not disclosed to former tenants in any consultation.

Legal basis: *Planning Act, 1990, ss. 17, 34; Official Plan ss. 3.1.1, 5.5.1.*

Action 3 — Re-engage the Community Through a Genuinely Collaborative, Iterative Process

What is required is not a corrected version of the consultation that has already failed. It is a different model of engagement from the outset — one in which both proposals are placed before the community, feedback shapes options rather than ratifies outcomes, and the process runs through documented stages with public reporting at each.

The Waterfront Toronto engagement framework, developed over two decades of tri-government city-building and widely recognized as a benchmark for public participation in Toronto's planning context, establishes the relevant standard. Its principles include:

- **Act with Clarity and Purpose** — communicate goals with accuracy, and be honest with stakeholders about their actual impact on the decision-making process.
- **Commit to an Ongoing Process** — engagement is an ongoing process of dialogue, dissent, consensus building, and learning, not a single event followed by a decision.
- **Support Diversity and Inclusion** — eliminate barriers to participation and ensure representative, diverse, and inclusive engagement.
- **Cultivate Collaboration** — city-building is a shared responsibility that requires coordinated efforts, shared knowledge, and shared decision-making.

For major projects, Waterfront Toronto establishes a Stakeholder Advisory Committee providing ongoing feedback at key decision points, and reports back to participants after every consultation on how their input was

incorporated. That standard — multi-stage, documented, with a traceable evidentiary chain between community input and design outcomes — is precisely what is absent from the Swansea Mews record.

The community does not ask that this process begin again from zero. The displacement has lasted nearly four years. The urgency to return is real. But the process now required must demonstrate to former residents and neighbours that their engagement can change outcomes. A formally facilitated, linguistically and physically accessible engagement process must: present both the TCHC proposal and the Swansea Park proposal with equal clarity; be conducted by an independent facilitator; structure feedback in documented iterations that are reported back at each stage; and incorporate the outcomes formally into the Stage 2 Actions Report before any Site Plan application proceeds.

Legal basis: *NHSA, 2019, s. 4 (meaningful participation as federal funding condition); Official Plan ss. 3.1.1, 5.5.1; AODA; TCHC Tenant Charter (meaningful participation; right to information); PH20.8, Clause 7 (Stage 2 Actions Report requirement).*

Action 4 — Replace the Lottery with a Needs-Based Unit Allocation Process

The December 2, 2025 lottery must be replaced by a process that matches returning households to units based on documented household size, accessibility needs, and stated preferences — the standard in comparable revitalizations including Regent Park (2005), Lawrence Heights (2010), and Don Somerville (2023).

Legal basis: *TCHC Tenant Charter; HSA, 2011; AODA; Ontario Human Rights Code.*

Action 5 — Complete the Mandated Provincial Engagement

The Council-directed engagement with the Ontario Minister of Municipal Affairs and Housing (PH20.8, Clause 8(a)) must be completed and its outcomes reported to Council before Site Plan submission proceeds. This obligation applies regardless of which delivery model is adopted.

Legal basis: *PH20.8, Clause 8(a); Ontario Planning Act, 1990, s. 17; MAHA funding eligibility conditions.*

FIVE ACTIONS THIS COMMUNITY IS REQUESTING

1. Defer ratification of the February 2026 Decision Report pending the Stage 2 Actions Report and review of the formal Integrity Commissioner complaint — a complaint based in part on a recorded private call in which the Chair stated his settled voting intention six days before the hearing.
2. Enter both the Swansea Park proposal and this Submission into the formal planning record and require a written explanation of why the alternative was withheld from prior consultations.
3. Re-engage former residents and neighbours through a genuinely collaborative, iterative process modelled on the Waterfront Toronto engagement framework: both proposals presented with equal clarity, an independent facilitator, documented feedback stages with reporting at each, and outcomes formally incorporated into the Stage 2 Actions Report before any Site Plan application proceeds.
4. Replace the lottery unit allocation process with a needs-based matching process aligned to the documented household compositions, accessibility requirements, and preferences of returning tenants.
5. Complete and report the Council-directed provincial engagement (PH20.8, Clause 8(a)) before Site Plan submission proceeds.

CONCLUSION: A PROCESS OWED

In May 2022, this community lost more than a building. It lost a place — a human-scale, ground-oriented community of stacked townhomes that had been home to 115 households, many for decades. The emergency was real. The urgency to rebuild is genuine. And those waiting to come home, and those who live beside this site, are entitled to something the planning process has not yet delivered: the full picture.

A local architect who has lived in this neighbourhood for over 20 years — who once worked for the institution now proposing to rebuild here, and who said so on the public record at the February 26 Committee — spent his own time and resources developing a different vision. He built a public website. He invited feedback. He made the work available. The former tenants, displaced and waiting, were not shown it. Not because it was unavailable. Not because it was unknown. Simply because it was not shared.

The Chair of the Committee that approved this application stated on the Friday afternoon before the hearing — in a private recorded call — his settled intention to vote in favour, characterised those who opposed the application as manufacturing bad-faith reasons, and disclosed pre-decisional staff views unavailable to any other community member. Several people who were told of this determination concluded there was no point in making a deputation. The hearing that followed was chaired by someone who had already decided.

Open Houses and statutory consultations conducted under Ontario's Planning Act are required by law to be inclusive and non-intimidating, providing participants with the information they need to engage meaningfully. A consultation that presents a single option while concealing the existence of another — and that is chaired at Committee stage by someone who has pre-determined the outcome — does not meet that standard. This submission documents those failures, asks for a formal explanation, and asks for what should have been offered from the beginning: both proposals, on the table, for the community to see and to consider.

The community's strong preference is for this matter to be resolved through the governance mechanisms that exist precisely for this purpose. Council's vote on March 25–27, 2026 is that mechanism. These five actions are what a fair process requires.

SUBMITTED BY

The Swansea Neighbourhood and SwanseaMatters.com participants. Ward 4 — Parkdale–High Park, Toronto. One named individual submits on behalf of this group; others may join as the investigation and Council process proceed.

Community representative contact to be provided directly to the Planning and Housing Committee and relevant offices. To the extent that any participant is a displaced former resident, their identity will be protected throughout the process.

Reference: Swansea Park Housing Proposal — David Peterson Architect, Fall 2024 — swanseapark.ca

Companion document: Formal Complaint to the Integrity Commissioner, City of Toronto — The Swansea Neighbourhood and SwanseaMatters.com participants — March 2026

COPIES TO: Mayor's Office | City Clerk | Planning & Housing Committee | TCHC CEO | Ombudsman Toronto | Integrity Commissioner | Federal Minister of Housing | Ontario MMAH | Federal MP, Parkdale-High Park | CMHC | Accessibility Standards Ontario

ADDENDUM TO COMMUNITY SUBMISSION

Swansea Mews Revitalization — 21 Windermere Avenue — Item 2026.PH28.2 and PH28.3

Submitted by: The Swansea Neighbourhood and SwanseaMatters.com participants

Date: March 24, 2026

Contact: Greg Homonylo — ourswanseamatters@gmail.com

Reference: Addendum to the March 2026 Community Submission already in the Council record for Item 2026.PH28.2

This addendum supplements the community submission filed with the City Clerk in March 2026 and already in the Council record for Item 2026.PH28.2 and PH28.3. It adds six categories of new evidence confirmed or discovered after the original submission was filed. The community's request for deferral of the March 25–27 ratification is renewed in full.

Since the original submission was distributed, the offices of Councillor Paul Ainslie, Councillor Stephen Holyday, and Councillor Michael Thompson have acknowledged receipt of community correspondence. The petition at SwanseaMatters.com has now reached —1,325 verified signatures — up from 1,001 at the time of the original submission.

1. TWO ON-AUDIO ADMISSIONS — NOVEMBER 20, 2025 OPEN HOUSE — NOT IN THE DECISION REPORT

The original submission described the November 20, 2025 Open House as held in a school basement hallway, without amplification, wheelchair access, or public record, and described by an independent observer as negligent. Since the submission was filed, audio from that session has been reviewed and two additional on-record statements have been confirmed.

City Planning Manager Dan Nicholson — the City official assigned to the Swansea Mews file and one of eight City staff present that evening — stated on audio at the close of the session, in direct response to a community member who said “this is a basement hallway — I was insulted”:

| *“The venue was a mistake.”*

Councillor Gord Perks, asked directly by a community member why the meeting was not held somewhere people could actually hear each other, stated on audio:

| *“You’re quite right.”*

Neither statement appears anywhere in the February 10, 2026 Decision Report that Mr. Nicholson subsequently contributed to — a report that treated the November 20 Open House as an adequate consultation milestone. The City Planning Manager assigned to this file said the

venue was a mistake. The Councillor who chaired the approving committee agreed the community was right to object to it. The Decision Report records neither assessment.

2. CANADA POST ROTATING STRIKE — NOTICE PERIOD, NOVEMBER 14–21, 2025

The original submission noted that flyers for the November 20 Open House were hand-delivered to residents within 120 metres because Canada Post timelines could not be met. Former Swansea Mews residents were notified by email on five business days' notice — which is itself inadequate for a mandatory statutory consultation affecting a displaced community rehoused across the city. What the original submission did not state: Canada Post was on an active rotating strike from November 14 to 21, 2025 — the precise week during which notice was required. For the surrounding neighbourhood residents who would normally have received mailed notice, postal delivery was not merely impractical. It was operationally unavailable. The statutory notice obligation under the Planning Act extends beyond a direct email list. The five business days notice was given in a week when that broader notice mechanism did not exist.

3. MINIMUM QUORUM — AND \$116,417,502 IN CITY CONCESSIONS ON AN UNVERIFIED FOUNDATION

The February 26, 2026 Planning and Housing Committee hearing that approved this application was held at minimum quorum: four of six Committee members were present. Councillors Bradford and Myers were absent. Councillor Matlow did not vote in favour.

A planning decision that permanently locks the built form, density, and use mix of a displaced community's homes — and that commits the following City concessions drawn from the February 10, 2026 Decision Report, reviewed and agreed to by the Deputy City Manager and Chief Financial Officer — was approved by the minimum number of members legally required to constitute a valid vote:

- **Foregone development charges:** \$20,380,823
- **Foregone parkland dedication fees and community benefits charges:** \$9,207,000
- **Net present value of 30-year property tax exemptions:** \$86,829,679
- **Total estimated City concessions:** \$116,417,502

This figure rests on a confidential financial model produced internally by TCHC through its commissioned consultants. There is no publicly available or producible report underlying the 649-unit density figure on which these concessions are based — confirmed in writing by City Planning Senior Planner Doris Ho on March 3, 2026. Council is being asked to ratify permanently, on a minimum-quorum Committee vote, \$116 million in public concessions whose analytical foundation has never been placed on the public record.

4. THE COMMUNITY’S REPLACEMENT CONSULTATION — AND WHAT IT RECEIVED

On November 21, 2025 — the morning after the Open House — the community independently booked Runnymede Church at its own initiative and expense and invited TCHC, City Planning, and the Ward Councillor’s planning consultants to participate in a proper replacement consultation, open to both returning residents and the surrounding neighbourhood.

Dennis Braun, Director of the Priority Development Review Stream at City Planning, responded on November 25. Before the City would consider attending a meeting the community had organized at its own expense to remedy the City’s own inadequate process, he asked the community to provide a brief introduction to the group, the names and contact information of hosts and facilitators, and the full agenda. The community that had been given five business days notice for a mandatory statutory consultation — during a postal strike — was asked to credential itself before City staff would attend the replacement meeting it had organized.

Shane Bourne, TCHC’s Senior Manager of Revitalization Engagement, responded on November 26. He declined to attend. He redirected the community’s initiative into a written Q&A to be distributed through the Ward Councillor’s newsletter — the same newsletter issued by the Councillor who had stated his settled voting intention six days before chairing the February 26 hearing.

The community did not merely fail to engage. It actively organized its own remedy at its own expense. The institutional response was to ask it to credential itself and then route its initiative through the newsletter of the Councillor who had stated his settled voting intention six days before chairing the February 26 hearing.

5. THE FEBRUARY 26 HEARING RECORD — CONTAMINATION QUESTIONS WITHOUT CONCLUSIVE ANSWERS

At the February 26, 2026 Planning and Housing Committee hearing, Councillor Crisanti asked directly about the consultation process and school capacity. Councillor Matlow raised the contamination concerns documented by multiple deputants. The exchanges are on the public record of the hearing.

Councillor Matlow — 🕒 2:31:23

“There were concerns raised regarding ecological issues. One if not more deputants claimed that the property itself might be contaminated and that there could be health concerns for residents. Could somebody speak to that concern?”

Toronto Building staff responded that a Record of Site Condition is typically required when use changes from a more hazardous to a less hazardous use, and stated: “However, on this site you already have an existing use of residential. So I don’t believe the record of site condition would necessarily be required in this case.”

Councillor Matlow — 🕒 2:32:15

“Required or not — can someone conclusively and authoritatively say that there are no health concerns regarding the past uses of the site and that it will be healthful and safe for new residents?”

The response given was: “that will be through the environmental studies that would be going through the site process” and “would be to the standard that would protect against anything that may be found through that process.”

That is not a conclusive and authoritative answer. It is a deferral to a future process. Councillor Matlow asked for certainty about existing conditions. He received a promise of future compliance. The Chair allowed that answer to stand and called the vote.

Councillor Matlow — 🕒 2:33:26 — Water Table

“Is the building going to be into the water table or above it?”

The acting director for engineering review confirmed the water level varies from 2.84 metres to almost 5 metres below surface and that the building design does not reach the water level. What was not addressed: whether the contaminated groundwater documented in the City’s own hydrogeological study is the same groundwater that sits at 2.84 to 5 metres below surface. The answer addressed the structural question. It did not address the contamination question. The two are not the same question.

6. NO RECORD OF SITE CONDITION — A MANDATORY LEGAL PREREQUISITE TO CONSTRUCTION NOT BEFORE THE COMMITTEE

Under Section 168.3.1 of the Ontario Environmental Protection Act and Ontario Regulation 153/04, a Record of Site Condition must be filed with the Ministry of the Environment, Conservation and Parks and acknowledged before a building permit can be issued for any development involving a change of use to a more sensitive use, including residential development on a site with a history of contamination. This is a mandatory legal prerequisite to construction.

The southern portion of the Swansea Mews site — where the proposed 35-storey tower is planned — was historically a pond subsequently filled with industrial waste and tailings and later occupied as a gas station site. The City’s own hydrogeological study documents contaminated soil and groundwater on the site. On January 7, 2026 — before any construction has occurred — a nearly metre-deep sinkhole opened on Windermere Avenue in the Swansea neighbourhood, closing the street and reported by CP24 and CTV News. Active foundation cracking has been reported on adjacent Coe Hill Drive. These are not community allegations. They are documented, reported facts.

No Record of Site Condition has been filed for this site. This was not disclosed at the February 26 hearing. The response given to Councillor Matlow's direct question — that an RSC is not required because residential use already exists on the site — does not address the contamination history documented in the City's own hydrogeological study. The RSC requirement under Ontario Regulation 153/04 is triggered by the history of contaminating activity at a site, not solely by the current surface use. A former industrial waste fill site and gas station does not become a clean site because residential buildings were subsequently built on it.

The October 2025 provincial amendments to O. Reg. 153/04 — analyzed by McMillan LLP, WeirFoulds LLP, BLG, and Cassels — explicitly reduced RSC requirements for low-risk sites only. Every legal commentary on those amendments confirms the same point: where contamination has been identified or where the site history includes industrial or commercial uses that may have left contamination, the RSC requirement remains fully in force. The Swansea Mews site is not a low-risk site by any reasonable reading of the amendments or the documented site conditions.

This matters in three ways that were not before the Committee:

First — building permit prerequisite. A building permit for the proposed 35-storey tower cannot be issued until an RSC is filed and acknowledged by the MECP. The planning instruments Council is being asked to ratify lock in the built form and density — but the physical development cannot legally proceed until Phase I and Phase II Environmental Site Assessments are completed by a qualified person, contamination is assessed, and any required remediation is confirmed as complete or managed under an approved risk assessment. The financial cost of that remediation is unknown and has not been disclosed to Council.

Second — financing prerequisite. CMHC, Build Canada Homes, and institutional lenders require environmental certainty before advancing funds on contaminated sites. The \$116,417,502 in City concessions and the federal funding this project depends on are premised on a development that cannot receive a building permit until the RSC process is complete. No funding confirmation has been tabled. No remediation cost estimate has been disclosed. Council is being asked to ratify permanently a project whose environmental compliance pathway and its financial cost have not been placed on the record.

Third — the TRCA has not been engaged. The site is within 120 metres of the Grenadier Pond and Catfish Creek Environmentally Significant Area. City of Toronto Official Plan section 3.2.1.4 requires a natural heritage impact study before development within or adjacent to an identified natural heritage feature can proceed. No such study was conducted. The Toronto and Region Conservation Authority — the regulatory body with jurisdiction over the adjacent watershed — has not been provided an opportunity to review and confirm the groundwater strategy. Architect David Peterson confirmed this in his February 26 deputation. It was not addressed by the Chair or by staff.

These are not planning objections. They are unresolved legal prerequisites to construction that were before City staff at the time of the February 26 hearing and were not placed before the Committee. They remain unresolved as Council votes on Wednesday.

RENEWED REQUEST FOR DEFERRAL

The original submission requested that City Council defer ratification of the February 2026 Decision Report pending completion of the Stage 2 Actions Report directed by Council in April 2025 and never tabled — the foundational document containing the project budget, financing strategy, delivery model options analysis, and partnership framework that Council itself required before this stage could proceed. That document has not been produced. That request is renewed.

That request is renewed. The six categories of evidence in this addendum — two on-audio admissions suppressed from the Decision Report; a postal strike that made statutory notice operationally unavailable; a minimum-quorum vote committing \$116 million on an unverified foundation; an institutional redirection of the community's own replacement consultation; unanswered contamination questions at the hearing; and unresolved mandatory environmental prerequisites to construction — together establish that the process that produced the February 26 approval was more materially compromised than the original submission documented.

The community's strong preference remains for this matter to be resolved through the governance mechanisms that exist for precisely this purpose. Council's vote on March 25–27, 2026 is that mechanism. One hundred and eight families have waited nearly four years. They are owed a process that was fair. This one was not.

This addendum is submitted for entry into the public planning record for Item 2026.PH28.2 and PH28.3 and is addressed to all members of City Council.

Companion document on file: March 2026 Community Submission — already in the Council record for Item 2026.PH28.2 and PH28.3.

Greg Homonylo

On behalf of the Swansea Neighbourhood and SwanseaMatters.com participants

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