

Letter of Objection & Deferral Request

Application Number: 25 221109 STE 04

February 12, 2026

Attention:

Planning and Housing Committee

phc@toronto.ca

Holly Carrie-Mattimoe

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Subject Property:

Swansea Mews Housing Development

21 Windermere Avenue, Toronto, Ward 4 – Parkdale-High Park

Toronto and East York District

Application Number: 25 221109 STE 04

Applicant:

Toronto Community Housing Corporation (TCHC)

931 Yonge Street, 2nd Floor, Toronto, ON M4W 2H2

The following are responses to the current materials submitted by the applicant for the public lands at Swansea Mews site.

Item 1

The IDP

The Initial Development Plan (IDP) was approved by Toronto Community Housing and Toronto City Council. The IDP was presented without other options, see Appendix A. At the time of the approval, towers can be understood as the contemplated built-form given the large footprint of the proposed building blocks, see Appendix A and accompanying the IDP.

Towers can be an appropriate building type as we have seen elsewhere in the city. But, *are towers appropriate everywhere? How should we measure the appropriateness of towers for a given site?*

The Swansea Mews is a unique site; it is adjacency to [Ecologically Significant Lands](#) as described by the Toronto Official Plan. The impact on these sensitive ecosystems can provide an evidence-based critique of the proposed built-form. We can also examine market forces for feedback on the feasibility of the development. Together, the ecology and market viability offer clear guidance for the appropriateness of the applicant's proposal and yardsticks for measuring alternative development solutions.

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Item 2
Ecology

Many stakeholders may reasonably contend that a 35-storey tower, as proposed by the applicant, should not abut lots with two storey houses. While this adjacency should be deemed “aggressive”, it does not provide an objective suggestion for what the building height should be. However, when we examine the shadows cast by the towers onto ecologically protected parklands, we can determine specific height limits for the built-form. For example, we know that swans nest in spring along the western edge of Grenadier Pond in High Park. The applicant’s March shadow study confirms that this nesting area will be impacted. Additionally, Catfish Pond in Rennie Park will also be affected by the tower’s shadows. *The extent of the ecological impacts is not considered by the applicant as they have neglected to submit an ecological study.* The suggestion that this study will be submitted at the Site Plan Approval phase misunderstands the report’s value in providing a meaningful and necessary critic of the proposed built-form. All stakeholders, the Ward 4 community, the TCHC, and City Council, should have specific knowledge of the development’s impacts on these sensitive public lands prior to making an Official Plan and Zoning Bylaw Amendment decision.

Item 3
Ecology,
Ground Water
Contamination

The applicant’s hydrological report confirms that the water table is relatively high, 3m to 4m below the surface. Importantly, the report notes the ground water is contaminated (Sitari, Table 5-5) There are specific suggestions for managing the polluted water during construction (Sitari, 5.6 Ground Water Quality). However, there is no review or recommendation for treating the ground water to mitigate contamination in the subwater shed. This is outside the scope of the report. Fortunately, the Toronto and Region Conservation Authority (TRCA) is mandated to review the impacts of development within the Lower Humber River Subwatershed for which the site belongs (Sitari, 8.0 Conclusions). At present, the TRCA has not provided comment. Again, stakeholders should have this critical feedback in their assessment of the applicant’s proposal.

Item 4
Market Viability

Do the displaced and returning TCHC residents want to live in a tower? Does the marketplace want more towers?

Within 2km of the subject land, there are multiple large tower development sites, the Sobey’s Plaza and the former Mister Christie factory. The market is “well supplied” with this housing type (TRREB, Condo Market Report). Urbanation, a source of information and analysis on the condominium market since 1981, reports falling condo housing starts (Urbanization, New Condos

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Sales). These agencies point to a trend away from towers. *All stakeholders of this public land should be deeply concerned the applicant has not explored alternatives to towers in a marketplace saturated with them.*

Item 5 Development Alternative

[Swansea Park](#) was created to provide an alternative to the applicant's IDP which relied on tall buildings, see Appendix B. This counter-proposal began with an ecological idea, a park. At the heart of the development proposal is a central landscape that would resemble the naturalized backyard ravines seen throughout the Swansea and High Park neighbourhoods. The shared landscape would belong to Toronto Parks, a public agency that would provide maintenance when needed. The ongoing landscape care, however minimal, would increase the desirability of the market and Rent Geared to Income (RGI) units alike. With the inclusion of specific planting, the ground water contamination could be mitigated by the central landscape. An ecological report could provide recommendations for the implementation of this approach to decontamination. This ecology first approach to public development accomplishes two desires: it *adds housing units and simultaneously increases the public parkland*. More than just counting units today, this counter-proposal seeks to *expand the idea that Toronto is a green livable city*. A place where nature is not forgotten but protected.



Image 1.

The Swansea Park Counter Proposal (An Alternate IDP)

Created by David Peterson Architect for the all Stakeholders of this land (2024).

Refer to Appendix B for the complete proposal.

Item 6 The buildings that surround the naturalized park landscape are conceived as

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Development
Alternative,
Modular
Midrise

modular mid-rise. At 6, 8, and sometimes 10 storeys, the buildings would not cast shadows onto Rennie or High Park. They are modeled after the Roncesvalles Courtyard Residence in the High Park neighbourhood, see image 2 below.



Image 2.

6 Storey Courtyard Residence,
25 Ritchie Avenue, Toronto (High Park Neighbourhood), Completed 2012.
Triumph Developments with David Peterson Architect Inc.

This courtyard residence provides a tangible alternative. Fundamentally, this built-form is a world apart from the concrete high-rise tower. Firstly, TCHC residents could have units onto a landscaped courtyard rather than units in the sky away from trees and birds. This model is a multi-residential housing form which best emulates the backyard condition found in detached houses where children independently move in and outside. It is not surprising parents have preferred this living circumstance. This typology is highly desirable in a city where detached homes are financial out of reach for many.

Secondly, the lower cost of modular construction, combined with its shorter construction period, shifts the development proforma and makes midrise a profitable alternative to the tower. The Swansea Park IDP contemplates 14 modular midrise buildings which creates further efficiencies. The modular factory can set to work on 14 buildings that already have their approvals in place. Under the Rapid Building Initiative, the City of Toronto has already prequalified teams to provide modular buildings. The federal government

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continues to signal their interest in making use of Canadian lumber and steel for modular housing. All conditions suggest movement away from towers toward modular midrise housing.

Item 7 Deferral Request

When our development decisions focus too closely on maximizing the unit count then we inevitably lose sight of other values. We forget to check on issues we collectively decided were important enough to codify. [No public project should diminish Rennie or High Park. The Official Plan has designated these areas as special; important to a city and its neighbourhoods.](#)

We request that the Planning and Housing Committee along with City Council reconsider the development proposal submitted by TCHC and pursue a different approach to the development. Why not use the development alternative presented here as an opportunity to establish relationships with modular development partners that default to mid-rise rather than high-rise towers? Why not foster growth and innovation in the housing sector which is presently struggling in our city?

[We request a deferral so that the applicant and its team can use the Swansea Park proposal as an alternate IDP.](#) The consultant team could make use of the existing engineering reports and refine their work based on a concept that begins with our stated values.

We request that the development application be deferred for the following reasons.

- (1) The applicant should include an ecological study to review the proposal's impact on the Ecologically Significant Lands protected by the Official Plan.
- (2) The Toronto and Region Conservation Authority (TRCA) has jurisdiction over the site's sub-watershed. The TRCA should provide comment on the ground water contamination and mitigation management.
- (3) The applicant and its consultant team should provide stakeholders and an option that does not rely on towers but make use of midrise buildings. The Swansea Park counter proposal provides an alternative IDP. The consultant team should be given additional time to review and advance this concept.

Regards,



David Anand Peterson, Architect, OAA

Principal, David Peterson Architect Inc.

