

# Letter of Objection and Request for Deferral



Scan the QR Code to Support Alternate Proposal [www.swanseapark.ca](http://www.swanseapark.ca)

Photos: Sewage Contaminated Stormwater Flooding Coe Hill Dr.

February 22, 2025

Ref: PH28.2 - 21 Windermere Avenue (1-154 Swansea Mews) Application No. 25  
250881 STE 04 OZ / PH28.2

Proposed Redevelopment: 21 Windermere Avenue (Swansea Mew Revitalization)

Attn Nancy Martins [phc@toronto.ca](mailto:phc@toronto.ca)

The Councillors of the Planning and Housing Committee

This proposal is built on **CONTAMINATED LAND** with **MAJOR SETTLEMENT** and **DEWATERING** problems endangering the Returning Residents of Swansea Mews and the Adjacent Community Neighbours.

I am submitting these comments as a homeowner at the east side of the proposed redevelopment site, where a 35 and a 20-storey tower is planned in very close proximity to existing low-rise homes. While I support the safe replacement of the former Swansea Mews buildings and the return of displaced residents, the current proposal raises **significant planning, infrastructure, safety, security and healthy livability concerns** that must be addressed before any rezoning is approved.

It is urgent that this proposal is replaced with the safe, secure and sustainable proposal at or like [www.swanseapark.ca](http://www.swanseapark.ca)

---

## 1. Scale of Intensification and Policy Redesignation

### Relevant Policies:

- Official Plan (OP) 2.3.1 – Healthy Neighbourhoods
- OP 4.1 – Neighbourhoods
- OP 4.2 – Apartment Neighbourhoods
- OP 5.5.1(c)(ii) – Community Consultation

The proposal increases the site from 154 low-rise units to 649 units and requires redesignation from “**Neighbourhoods**” to “**Apartment Neighbourhoods**.” This is a **major intensification**, not a replacement-in-kind.

OP 2.3.1 states that development adjacent to Neighbourhoods must “**respect and reinforce the existing physical character**.” A redesignation of this magnitude requires a clear demonstration of good planning and consultation proportional to the scale of change.

---

## 2. Setback Distance and Transition to Adjacent Homes

### Relevant Policies:

- **OP 2.3.1 – Healthy Neighbourhoods (transition in scale)**
- **OP 3.1.2 – Built Form (Policies 1–5)**
- **OP 4.1.5 – Development in Neighbourhoods (height, massing, setbacks)**
- **Mid-Rise and Tall Building Design Guidelines (transition requirements)**

The proposed **35-storey tower is located extremely close to existing low-rise homes to the east**, including my own.

OP 3.1.2 requires development to:

- Provide **appropriate transition in scale**
- Limit impacts on adjacent Neighbourhoods
- Provide adequate **setbacks and separation distances**

The current tower placement does not meet these expectations.

A step-down massing strategy and increased setbacks must be evaluated.

---

## 3. Shadow Impacts

### Relevant Policies:

- **OP 3.1.2(5) – Built Form (sunlight access)**
- **Tall Building Design Guidelines – Section 4 (Shadow Studies)**
- **OP 2.3.1 – Protection of Neighbourhoods**

The height and proximity of the towers will cast **significant shadows** on adjacent homes and yards.

OP 3.1.2 requires new development to “**adequately limit shadow impacts on adjacent Neighbourhoods, particularly during the equinoxes**.”

The current shadow studies acknowledge impacts, but mitigation is insufficient. Reduced tower height and increased setbacks must be explored.

---

#### 4. Geotechnical Concerns – High-Rise Construction on Refilled Land

##### Relevant Policies:

- **OP 3.1.2(6) – Built Form (safety and structural integrity)**
- **Toronto Municipal Code – Chapter 681 (Soil and Groundwater)**
- **Development Infrastructure Policy & Standards (DIPS)**

The Swansea Mews lands include areas of **refilled or disturbed soil**, raising concerns about long-term structural stability for towers of this scale.

OP 3.1.2 requires development to be “**designed to maintain the safety and integrity of the site and adjacent properties.**”

A full geotechnical investigation and independent peer review should be required **before** rezoning and production of the **missing Ecological/NHIS survey**

---

#### 5. Water-Main and Infrastructure Capacity

##### Relevant Policies:

- **OP 3.4 – The Natural Environment (stormwater management)**
- **OP 3.1.2(6) – Infrastructure adequacy**
- **DIPS – Servicing Capacity Requirements**

The application has already required downstream sanitary capacity analysis and multiple technical revisions.

This suggests that **infrastructure capacity is not yet confirmed.**

OP 3.1.2 requires that development be supported by **adequate municipal servicing**, and DIPS requires clear demonstration of:

- Water-main capacity
- Sanitary and stormwater capacity
- Required upgrades and timing

These must be publicly disclosed before rezoning.

---

#### 6. Public Transportation Capacity

### Relevant Policies:

- **OP 2.2.2 – Centres and Corridors (transit-supportive development)**
- **OP 2.3.1 – Healthy Neighbourhoods (mitigating impacts)**
- **Transportation Master Plan (TTC capacity considerations)**

The Windermere–Queensway corridor is already strained, with TTC routes frequently overcrowded.

OP 2.2.2 requires that intensification be “**supported by existing or planned transit capacity.**”

A transit capacity assessment is necessary to ensure the area can support this level of growth.

---

## 7. Neighbourhood School Capacity

### Relevant Policies:

- **OP 3.2.2 – Community Services and Facilities (CS&F)**
- **CS&F Strategy Guidelines (school capacity requirements)**

Local schools are operating near or at capacity.

OP 3.2.2 requires that development be evaluated for its impact on **schools, childcare, and community services**, and that capacity issues be addressed **before** approval.

A TDSB/TCDSB capacity review is required.

---

## 8. Traffic Congestion at The Queensway and Windermere

### Relevant Policies:

- **OP 2.3.1 – Healthy Neighbourhoods (mitigating traffic impacts)**
- **OP 3.1.2(2) – Built Form (minimizing impacts on the public realm)**
- **Transportation Impact Study Guidelines**

The intersection of **The Queensway and Windermere** is already heavily congested.

OP 2.3.1 requires development to “**mitigate traffic impacts on adjacent Neighbourhoods.**”

A comprehensive, realistic traffic impact study is essential.

---

## 9. Consultation and Official Plan Policy 5.5.1(c)(ii)

## Relevant Policies:

- **OP 5.5.1(c)(ii) – Community Consultation**
- **Planning Act – Section 2 (public engagement)**

The Official Plan emphasizes **early, meaningful, and collaborative consultation**. Given the scale of intensification and the required redesignation, the minimum statutory process is insufficient.

The recent community petition demonstrates a clear desire for **more robust engagement**, not opposition to redevelopment.

---

## Requested Actions

In light of the above, I respectfully request that:

1. **Tower heights (35 and 20 storeys) be reconsidered**, with analysis of reduced-height alternatives as designed [in www.swansepark.ca](http://www.swansepark.ca)
2. **Greater setbacks and step-down massing** be evaluated to ensure appropriate transition to adjacent Neighbourhoods.
3. **Shadow, geotechnical, infrastructure, transit, and traffic studies** be revisited and publicly disclosed.
4. **Additional community consultation sessions** be held prior to advancing rezoning, focused on built-form alternatives and transition impacts.

This is not a request to halt redevelopment. It is a request to ensure that the final form reflects **good planning, infrastructure readiness, safety, security** and **healthy livability** for both returning residents and the surrounding community as demonstrated in the alternative proposal [www.swansepark.ca](http://www.swansepark.ca).

Thank you for your consideration.

**Sincerely,**  
Alice Xue

2 Coe Hill Drive  
[OHORACLE@YAHOO.COM](mailto:OHORACLE@YAHOO.COM)

647-381-0554