

Significant Deficiencies in the 21 Windermere Avenue (Swansea Mews) Development Proposal

Submitted to: Planning and Housing Committee, City of Toronto

Re: Item – *Toronto Builds: 21 Windermere Avenue (1–154 Swansea Mews) – Official Plan and Zoning By-law Amendment Application*

Position: Opposition on grounds of incomplete and non-compliant submission under applicable City, Provincial, and Federal policies.

Date: February 25, 2026

Submitted by: Greg Homonylo

Introduction

The Neighbours stand with the Former Residents (Tenants) of Swansea Mews in opposition to this Proposal, as the two primary groups who must be consulted within a manner that meets with the City's stated Policy objectives leading to meaningful outcomes. The City is reviewing Proposal regarding 21 Windermere Avenue a Proposal to rebuild it in a deficient manner and as a result does not meet with the compliance requirements to meet complete Application status.

While the revitalization of Toronto Community Housing assets is an urgent priority, the current proposal for *21 Windermere Avenue* under the Toronto Builds Framework fails to demonstrate full compliance with the Planning Act (R.S.O. 1990), Provincial Planning Statement (PPS, 2024), A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020 Consolidation), the City of Toronto Official Plan, the Swansea Secondary Plan, and sustainable funding and housing quality requirements under Canada's National Housing Strategy Act (2019).

Deficiency Area 1: Community Consultation

Findings:

- Community engagement described in the report was limited to one in-person session (Nov. 20, 2025) and one pre-application meeting (Sept. 22, 2025). The in-person session was seen to be intimidating by those attending due to the manner in which it was designed and executed. (Exhibit 1)
- Minimal neighbourhood outreach: Only statutory minimum notice; no detailed engagement summaries provided.
- Insufficient participation: Consultations were largely informational; no participatory codesign with displaced tenants. No input from the public

- Former tenants—primarily low-income and equity-deserving groups—were not meaningfully included in co-design sessions, despite requirements under Toronto’s Engagement Policy (2023) mandating culturally appropriate, iterative engagement for vulnerable populations. **Former tenants (mainly low-income and equity-deserving groups) were not meaningfully included, based on their stated assessments with anyone who would listen at the Open House information session (“Consultation”).**
- Concerns about security, building height, lack of transparency, and loss of townhouse typology were recorded but not addressed within the revised submission.
- The lack engagement precipitated former residents and neighbours to pool limited resources to create a website to explain the narrative as a reference point, in addition to an active petition. These were both developed within two weeks of this Application hearing. <https://www.swanseamatters.com> receives 300 visits per day and growing, while the petition has approximately 1,000 verified signatures all within Toronto: <https://c.org/h8LzG4YpbN>

Policy Non-Compliance:

- PPS 2024, Policy 2.3.1.3 requires community-based planning processes that sustain complete communities.
- Official Plan Section 3.1.1(5) mandates that new development must reinforce and respect existing physical character and community input.
- Fails Official Plan Policy 5.5.1 requiring “meaningful participation of residents in shaping builtform outcomes.”
- The lack of co-creation contravenes City Council Item EX7.2 (2023) which explicitly requires early and continuous engagement in housing sites under “Urgently Building More Affordable Homes.”

Conclusion:

The consultation cannot be deemed “complete” under Toronto Municipal Code Chapter 415, Article III, Section 415-30(A), as a genuine participatory process was not demonstrated before submission.

Deficiency Area 2: Transportation and Infrastructure Capacity

Findings:

- The Traffic Impact Study indicates 90 AM and 120 PM trips but fails to address cumulative congestion already documented along The Queensway corridor (Transportation Services Report EX25.1, 2025).

- No comprehensive multi-modal impact assessment (including TTC capacity limits, pedestrian safety, and cycling integration) was conducted despite City policy requiring best practice analysis (per Toronto Complete Streets Guidelines, 2017).
- A single vehicular access point on Windermere Avenue concentrates pressure on a narrow local street network with school zone proximity (Swansea Jr. & Sr. Public).
- Traffic movement in between Queensway Avenue and Bloor Street will be impacted significantly given that in addition to this Proposal, on Southport Street, three thirty storey towers are Approved or seeking Approval, thus adding approximately 2000 additional units needing access points. Only three streets allow movement between Queensway Avenue and Bloor Street, and each is comprised of a single lane in both directions, with 40km to 30km speed limits. Windermere Avenue has a round- about, and multiple stops sings, a round-about, and a traffic light between the two arteries. Ellis Avenue has a Stop sign approximately 220 metres north of Queensway. South Kingsway is a tributary from the Gardiner Expressway, as well as Ormskirk, Southport and Queensway. (Exhibit 2)

Policy Non-Compliance:

- Growth Plan Policy 3.2.2.4 requires infrastructure planning to be integrated with land use decisions to ensure transit-supportive outcomes.
- Official Plan Policy 2.2.1(4) obligates that new development occurs with adequate transportation capacity and safety.
- The absence of proposed mitigation or public transit enhancements makes the submission incomplete.
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Deficiency Area 3: Livability and Built Form

Findings:

- The internal configuration of Building 2 creates a shadowed courtyard with limited daylight and airflow, contrary to the City’s Growing Up Guidelines (2020) for family units and minimum sunlight access. At the November 20 2026 Information “Consultation” it was described as follows by a teenage Former Resident “Courtyard. This is more like a Prison Yard. Do they think that we are criminals?” (Exhibit 3)
- Density (FSI 3.36) exceeds the transitional compatibility envisioned for this Neighbourhood-into-Avenue context under the Swansea Secondary Plan, which emphasizes preserving open space views and low-to-mid-rise character.
- Lack of explicit Community Services and Facilities (CS&F) impact assessment contravenes Official Plan Section 3.2.2, requiring clear demonstration of how local schools, recreation centers, and childcare can accommodate population growth.

Policy Non-Compliance:

- PPS 2024, Policy 2.3.1.3 – requirement for “complete communities” with accessible social infrastructure.
- Failure to demonstrate physical transition and sunlight access violates Toronto Tall Building Design Guidelines (2013, updated 2022) §1.3 and §3.2.

Deficiency Area 4: Environmental and Geological Risk

Findings:

- The methane concentration noted as “slightly above screening level for hazardous conditions” (Report, p. 13) triggers Ontario Regulation 153/04 under the Environmental Protection Act, necessitating a Record of Site Condition (RSC) prior to residential use—yet no RSC is cited.
- Proximity to Catfish Pond and a Provincially Significant Wetland (PSW) demands additional hydrological modeling per PPS 2024, Policy 4.2.2 and Conservation Authorities Act, RSO 1990, c. 27.
- Absence of below-grade parking minimizes excavation, but no methane mitigation design details or independent peer-reviewed environmental audit are included.
- Disregard for Cultural, Historical, Recreational and therapeutic values associated with High Park in addition to Tourism Revenues (Exhibit 4)

Policy Non-Compliance:

- Fails to meet requirements under Toronto Green Standard Tier 2 for low-carbon design verification and ecological connectivity.
- Contradicts Policy 2.2.1(6) of the Growth Plan, which prioritizes development away from hazardous lands.

Deficiency Area 5: Financial Viability and Maintenance Risk

Category	Estimated Foregone Revenues	Concern
Development Charges (2025 rates)	\$20,380,823	Relies entirely on foregone revenue; no third-party financial guarantee identified.
Parkland/CBC Waivers (2026 est.)	\$9,207,000	Removes obligations for local public realm enhancement.

Category	Estimated Foregone Revenues	Concern
Property Tax Exemption (99 years NPV)	\$86,829,679	Unprecedented discount without sustainability performance metrics.
Total Identified Incentives	\$116,417,502	Represents loss to City revenue streams affecting long-term maintenance.

Findings:

- The proposal’s reliance on 100% public subsidy and “foregone revenue” constitutes a funding gap under City Policy EX25.1 (2025) which requires that all Toronto Builds projects demonstrate a viable financing plan before zoning approval.
- The National Housing Co-Investment Fund and Build Canada Homes applications are speculative and not confirmed—contravening Financial Accountability Office (FAO) Act requirements for capital exposure.
- Ongoing operations and maintenance for 99 years are assumed by TCHC, an entity repeatedly flagged for deferred capital backlogs exceeding \$7 billion (Auditor General, 2023). The report references potential federal financing but provides no commitments—no term sheets, no letters of intent.
- There is no financial pro forma, no sensitivity analysis for cost escalation or interest rate risk, and no lifecycle maintenance plan for a building portfolio that tenants have previously described as historically under maintained.
- Housing that is not financially sustainable is not stable housing.
- Without clear funding commitments, risk analysis, and a 30 year capital reserve and operations plan, the financial component of this application is not complete. (Exhibits 5,6)

Policy Non-Compliance:

- Fails Canada’s National Housing Strategy (NHS) Policy Objective 1.2, which requires fiscal durability and accountability mechanisms for long-term affordability.
- Must meet Ontario Regulation 588/17 for asset management, which aligns with O. Reg. 588/17 to ensure fiscal sustainability and stewardship.
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7. Precedent Examples

- Regent Park Phase 1 (2005): Required verified financial partnership with private entities prior to rezoning; Swansea Mews has no equivalent.
- Lawrence Heights (2010): Included comprehensive CS&F and environmental risk analysis pre-approval.

- Don Summerville TCHC Revitalization (2023): Integrated third-party environmental peer review and TTC capacity study—absent here.

Conclusion

The current submission for *21 Windermere Avenue* does not meet the threshold of a complete and approvable application under municipal and provincial statutes. Deficiencies are observed in community consultation, transportation planning, livability and compatibility, environmental due diligence, and financial sustainability.

Recommendation:

That City Council defer approval of the Official Plan and Zoning By-law Amendments until the following conditions are met:

1. Completion of an independent environmental, financial, and infrastructure capacity review
2. Comprehensive, co-created consultation process with displaced former residents, and neighbours
3. Verification of sustainable long-term funding sources compliant with the National Housing Strategy and City of Toronto fiscal standards.

Sincerely,

Greg Homonylo

Neighbour

greghomonylo@gmail.com

Exhibit 1

Q&A:

- **Physically intimidating scenario**
- **no microphone**
- **elevated room tension leading to disengagement**

What I Saw:

I observed Councillor Perks positioned at the front of the room, with approximately fourteen individuals standing behind him in a half-circle formation. These individuals appeared to represent City staff, TCHC, Bousfields, and their respective partners. The arrangement created a noticeable backdrop of authority figures facing the attendees. The meeting took place in an overheated basement space configured like a long corridor, which contributed to physical discomfort and limited acoustics. The posture and positioning of those at the front conveyed an implicit power dynamic that made the environment visibly tense and unbalanced. Several attendees displayed signs of unease, such as shaking their heads, whispering, or withdrawing from participation.

What I Heard:

The absence of a microphone significantly impaired the ability of attendees to hear both questions and responses during the session. Despite being within close range—approximately twelve feet from the speakers—the combination of ambient noise, murmurs, and heat interference made the exchange difficult to follow. Attendees at the back frequently requested that questions or answers be repeated. Rather than these concerns being accommodated, the Councillor admonished participants to “listen,” which appeared to further discourage engagement. The background noise of quiet conversations and expressions of disbelief grew more pronounced as the session continued.

What I Felt:

I felt intimidated by the physical arrangement and by the tone of the interaction. The configuration of officials standing together created a strong sense of exclusion and reinforced a perceived “us versus them” divide between panelists and community members. The excessive heat and crowding contributed to the discomfort and anxiety present in the room. Overall, I experienced frustration and discouragement, as the environment and the manner in which dialogue was facilitated made genuine participation seem neither welcome nor meaningful.

Witnesses include:

Councillor Perks, Former Residents, Former Councillor of area, representative from Federal MP Office, Neighbours, Neighbourhood Association Members, City Staff, TCHC Staff, Bousfields staff, and representatives of their partners in areas of Build Form.



Exhibit 2

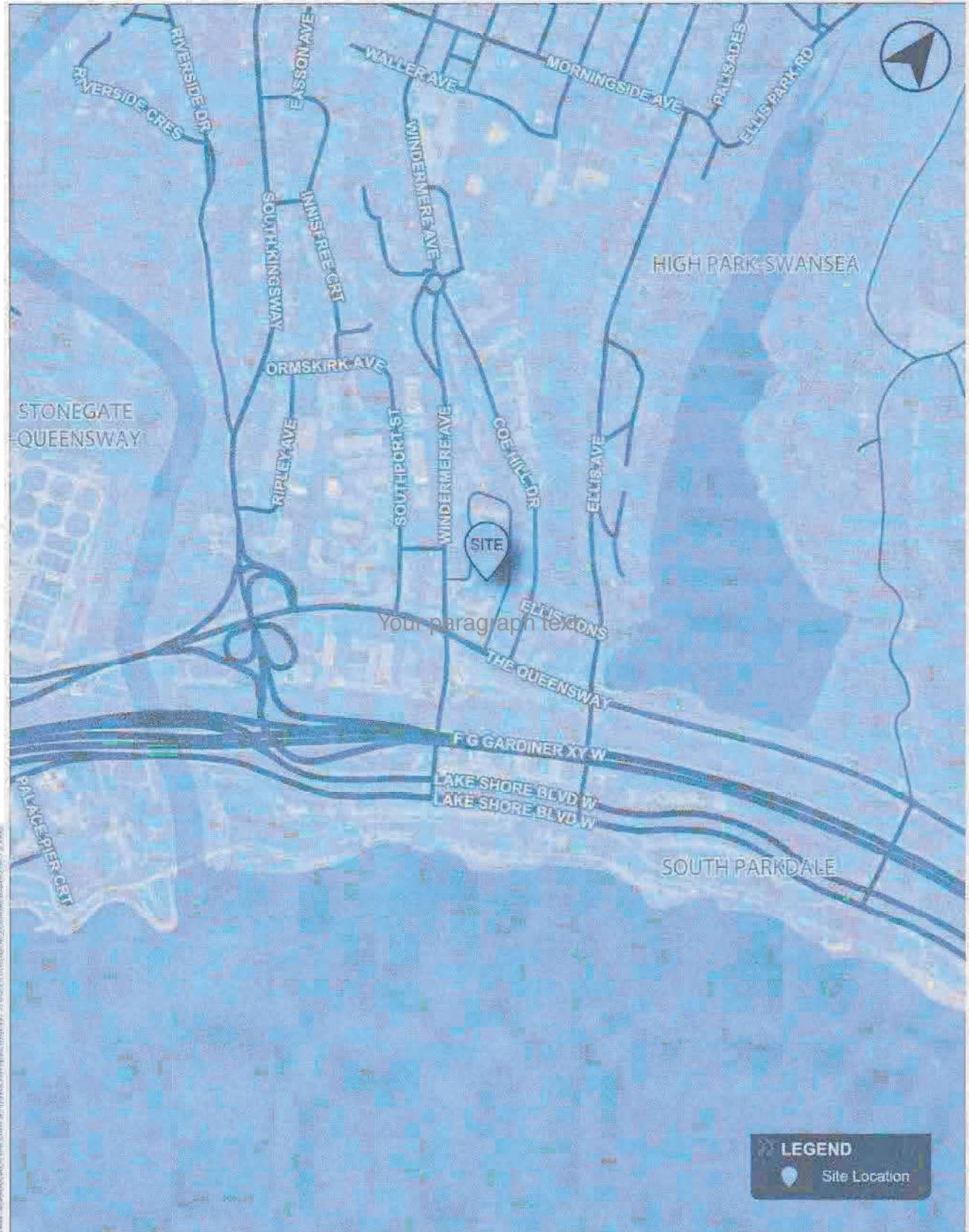


FIGURE 1 SITE LOCATION

Exhibit 3

Attachment 12: 3D Massing Model – Northwest View



Attachment 13: 3D Massing Model – Southeast View

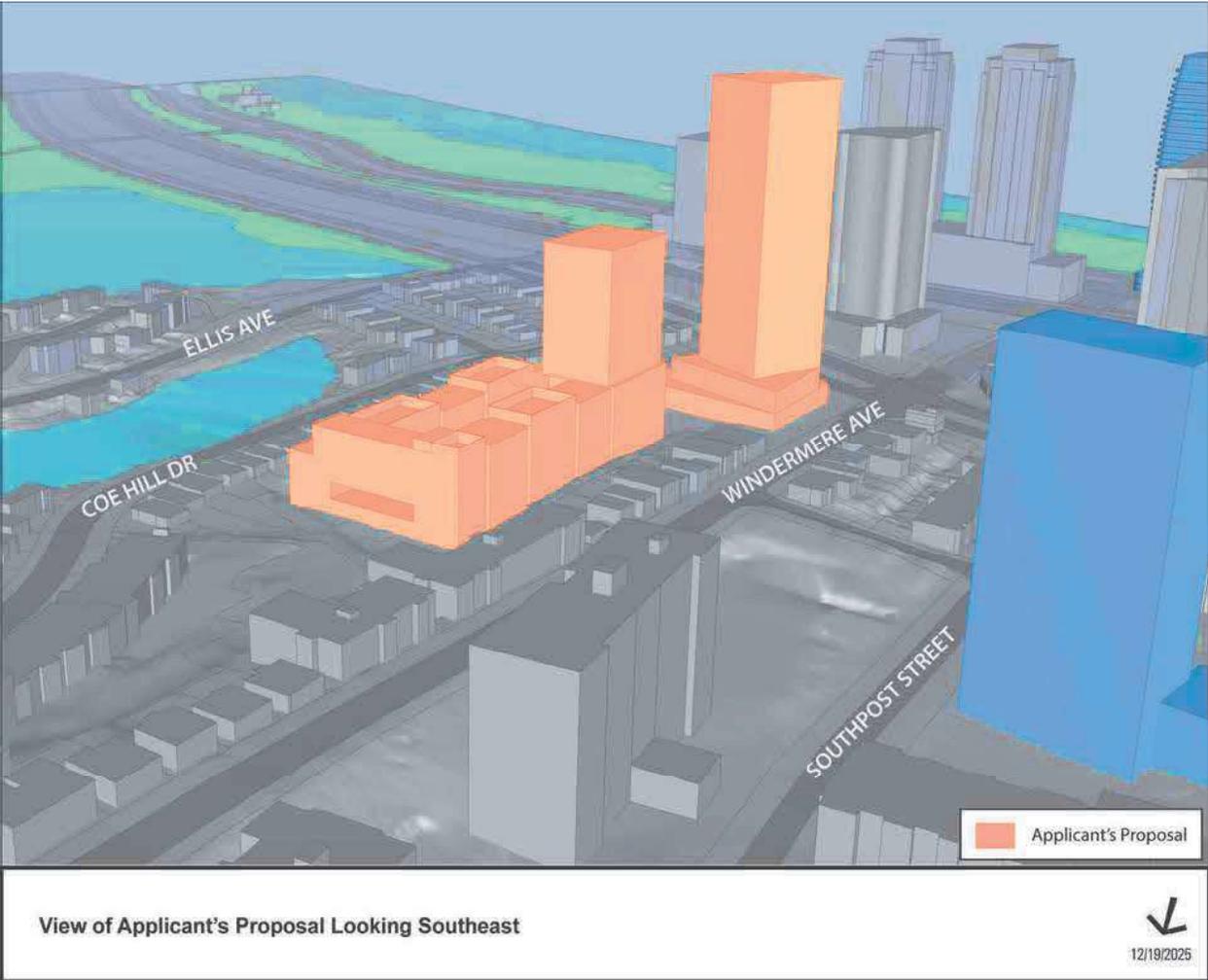
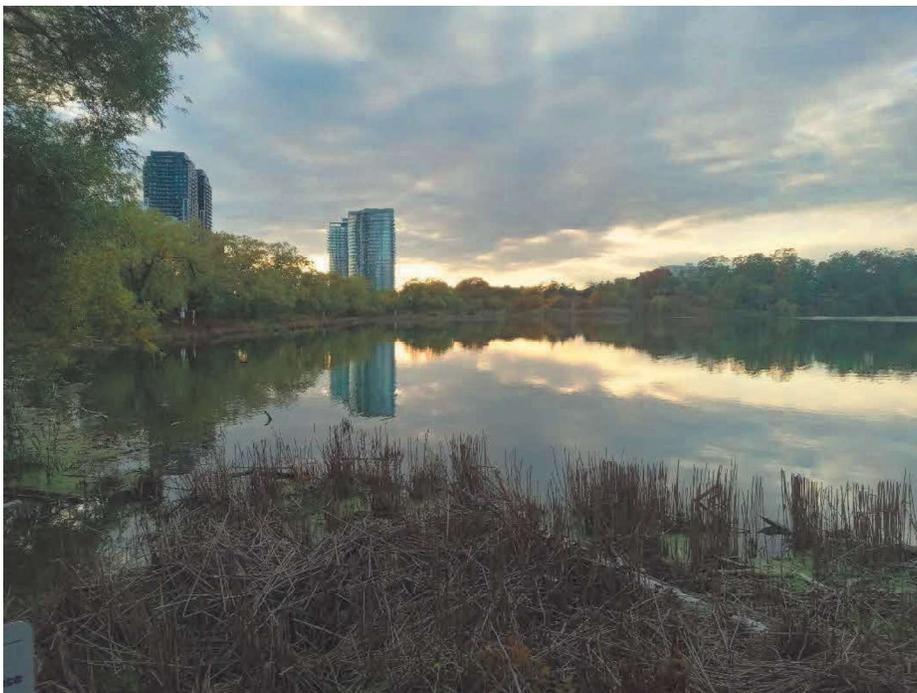


Exhibit 4



HOUSING

TCHC warns of huge cash shortfall

Toronto's biggest landlord says over half its units could fall into critical condition without repairs

VICTORIA GIBSON
AFFORDABLE HOUSING REPORTER

More than half the rental homes operated by Toronto's public housing agency could deteriorate into critical condition within 10 years, officials are warning — despite billions in public money sunk into avoiding that fate in the last decade.

While Toronto Community Housing Corp. (TCHC) says it has made steady progress on pulling homes out of poor and critical shape since securing \$1.3 billion from Ottawa to address its repair backlog seven years ago, the housing agency is now starting down the end of that deal — and the budget gap it could leave behind.

Noah Slater, TCHC's vice-president of facilities management, told the Star that absent new funding after 2027, nearly 30,000 of their aging homes are at risk of falling into critical shape in the next 10 years — putting the agency on shaky footing once again.

"We have a double crisis: funding falling off a cliff steeply, and needs coming in at a rate seven times faster than we've experienced over the last 10 years," Slater said, so the agency said its average building is now 58 years old.

Slater worries that growing disrepair and, in the worst case, unit closures could push more people from their housing communities into homelessness.

Remée Proctor, spokesperson for federal Housing Minister Gregor Robertson, confirmed some of the investments made under the federal 10-year National Housing Strategy were "set to sunset in 2028."

Federal, provincial and territorial ministers were all committed to continuing partnerships "to ensure ongoing support for affordable housing," Proctor said in a statement, noting "there is ongoing work and collaboration on the renewal of the National Housing Strategy."

TCHC's specific projections, shared with the Star, show 47 developments with around 19,300 homes are projected to hit critical disrepair by 2030. That rises to a projected 210 developments including nearly 90,700 homes reaching critical disrepair by 2035, TCHC's forecasts say.

These projections were revealed after assessments of hundreds of TCHC buildings in 2024 found more extensive and expensive problems than anticipated at multiple sites. For example, at one 350-unit building, TCHC identified \$239 million in unexpected repair needs, including to major building systems such as its electrical setup.

One challenge in forecasting repair needs, Slater says, is they sometimes don't realize major problems lurk beneath the surface since their regular assessments don't involve "destructive" testing like tearing down walls. He used the example of 300 Dufferin St., where corrosion inside the walls was only discovered after the apartment building's outer bricks cracked.

Now, the required level of repair has displaced the building's tenants, including 94-year-old Alicia Godoyo. Her sister Vivian described the relocation process as long and frustrating. It took nearly six months to find a new apartment that worked for her older sister's needs.

"It is hard to be packing and everything, and to be moving," Alicia recounted. While she understood there was a problem in the walls of her former home, she hadn't suspected such a serious issue. "We did not know."

In January, Alicia finally moved to a building a few minutes from the Dufferin site. The day she and Vivian spoke to the Star, there were still sealed boxes to unpack in the living room.

While the ground-floor unit works for Alicia and is near Vivian's home, it has its issues, like a screen door that doesn't close properly. "It's already reported," Vivian told a reporter who attempted to close the rusted door.

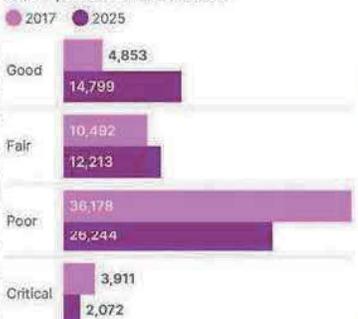
The same day, a flurry of roofing workers buzzed around the front doors of the building, which TCHC's data shows as being in critical shape.



Shannette Paul shines a light on a spot in her Toronto Community Housing home where a leak caused the ceiling to give way. Half of the public agency's housing stock is in critical condition, the agency says, as funding for repairs nears its end.

CONDITION OF PUBLIC HOUSING UNITS IN TORONTO

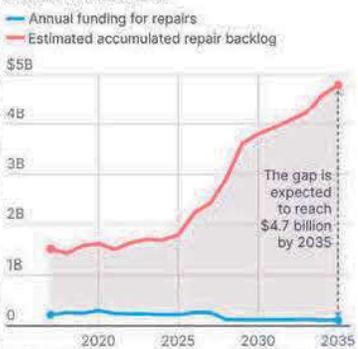
From 2017 to 2025, Toronto Community Housing Corp. has made progress on its repair backlog, with fewer units in poor and critical condition.



SOURCE: TCHC TORONTO STAR GRAPHIC

MORE REPAIRS, LESS MONEY

TCHC says between 2026 and 2035, it will need to spend \$4.5 billion on its buildings, but only has \$1.5 billion for that effort.



SOURCE: TCHC TORONTO STAR GRAPHIC

These days, Alicia prays that any leases in her new home can be remedied.

Since 2017, TCHC says it has spent \$2 billion on clawing down its repair backlog, plus more on urgent repairs as needed. It has improved the overall state of its homes — in 2017, 29 developments were in critical shape and 204 in poor shape, versus 30 in critical condition and 152 in poor condition now.

Still, many tenants are frustrated by repair issues at home.

Shannette Paul, a personal support worker, lives in a TCHC complex in Etobicoke's Jamestown area, and has faced her own share of repair issues — cupboards falling off hinges, leaks from the washroom, even rodents making their way inside. Her community, per TCHC's repair data, is in poor condition.

"They need to do better," Paul said of her landlord. She sees fixes done



Paul says her apartment has a leak problem from the bathroom, and that water gets in through the ceilings whenever it rains or snows.



A bug trap inside Paul's Jamestown home. "They need to do better," Paul said of her landlord. She sees fixes done on the outside of buildings, but says more attention should be paid to the inside.

on the outside of buildings, but says more attention should be paid to the inside. "I have three young kids. It's unhygienic, there's mould that's building up in the unit."

At some sites, repairs are in the works. In November, TCHC picked a contractor for a multimillion-dollar "deep retrofit" in another Etobicoke community called Scarlettwood, including foundation wall waterproofing plus new windows and patio doors at 73 townhouses, their report said.

But Slater noted that some of its single-family homes, particularly sites with protected heritage status including some that have been emptied, can be expensive to repair and "represent an investment that is difficult for us."

As a growing number of TCHC homes are expected to slide into critical condition in the years ahead, Slater says a major concern needs to be keeping more buildings from deteriorating to the point where they can't be inhabited.

"You just worry about retaining a precious asset — a precious stock of affordable housing," he said.

Rental rethink

TCHC to move ahead alone on large revitalization project

Toronto Star · 5 Dec 2025 · A1 · VICTORIA GIBSON

A hostile development climate has forced Toronto's affordable housing agency to change its plans on a mammoth revitalization project, forging ahead without a private developer for Lawrence Heights' second phase — while juggling a surprise bill for more than \$800,000 from Toronto city hall.



Toronto Community Housing Corp. (TCHC) is moving ahead on a single block of rental housing, directly leading the design, development and construction management of a 157-unit, midrise affordable rental building itself, rather than inking a deal with a private builder for multiple blocks at once.

Traditionally, in TCHC's largescale revitalizations, such as the transformation of Regent Park, it partners with private developers who can leverage the profits from marketpriced condos to pay for replacing affordable homes. That was the hope for Lawrence Heights, a 100-acre public housing community just south of Yorkdale Shopping Centre, where 1,208 aging affordable housing units are gradually being replaced with a denser, mixed-income community.

But officials were forced back to the drawing board for Lawrence Heights' second phase, in the face of a shaky development market where interest rates remain high, construction costs have risen and condo sales have cratered, according to a recent report to TCHC's investment and finance committee.

"The current market conditions do not support the traditional revitalization model previously envisioned," TCHC chief development officer Yves Cheung wrote in the report. It outlined a revamped plan, which will see TCHC proceed alone on the first block of phase two — a 157-unit rental midrise for seniors — in line with city hall's fledgling "public builder" approach.

This strategy leaves the door open for TCHC to still partner with private developers for later blocks within phase two of Lawrence Heights if the market shifts, Cheung wrote, but keeps the

project from stalling, which would threaten its chances of obtaining key federal funding. The project's budget is also facing an unexpected squeeze. Although city hall — which wholly owns TCHC — had previously granted TCHC an exemption from planning application fees for some work on phase two, Cheung's report said, it is now expected to pay \$832,000 in planning fees for other elements of phase two by the end of 2025, which it had not anticipated.

“Following recent direction from the City's Development Review division, TCHC is now required to pay all planning application fees related to revitalization and new site development,” it said. TCHC had not budgeted for those costs. But to keep the project from being derailed, the housing agency — which is persistently cashstrapped in the face of an aging portfolio and a substantial repair backlog — says it will pull together the money by “repurposing” underspending from other projects.

City hall and TCHC say the directive to pay the hefty planning application bill came after a city hall development application fee review in 2024. The conclusion of that review, city hall said in a statement, was that planning fees were meant to “recover the full cost of processing applications.”

Although exemptions had been granted casebycase under council direction in past, city hall stressed that TCHC was never given a “blanket exemption.”

Council records show an exemption was given for part of Lawrence Heights' second phase in 2023, around the creation of a new community centre.

The bill comes on the eve of a 2026 city budget that's expected to prompt belt-tightening across municipal government. Under Mayor Olivia Chow — who has hinted at keeping property tax increases lower next year than in 2025 — Toronto has already implemented a hiring freeze on nonessential workers. Chow also scrapped the board of the Toronto Parking Authority last month, in a surprise restructuring aimed at finding savings.

In its statement, city hall said TCHC was meant to use its capital budget — more than half funded by the city — for development and building repairs.

TCHC spokesperson Kimberly Moser, in a separate statement, said the housing agency learned about the bill in the summer, and that it was a “clear direction” from city hall to expect those application bills going forward.

TCHC expects to recoup the fees as city hall steps in with capital funding for phase two, Moser said, describing the two organizations as “close partners.”

With a new plan in hand, Cheung's report stressed the need to move quickly on the midrise plan — with TCHC required to have its zoning and construction cost estimates confirmed by January, and a contribution agreement inked by March, in order to access funds via the federal Affordable Housing Fund.

That program also has a \$1.5million allocation of “topup loans,” his report said, available on a “firstcome basis.”

“Any delay in meeting submission timelines may result in lost funding opportunities,” Cheung's report warned.