

PH28.2 - 21 Windermere Avenue (1-154 Swansea Mews) - Toronto Builds - Official Plan and Zoning By-law Amendment Application - Decision Report – Approval, Lenka Holubec, ProtectNatureTO

Feb 26, 2026

Nancy Martins

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Telephone: 416 - 397-4579

Fax: 416 - 392-2980

Email: phc@toronto.ca

Cc: councillor_perks@toronto.ca; councillor_nunziata@toronto.ca; councillor_bradford@toronto.ca; Councillor_Myers@toronto.ca; Councillor_Crisanti@toronto.ca; councillor_matlow@toronto.ca; joshua.wise@toronto.ca; kristen.vincent@toronto.ca; clara.greig@toronto.ca; john.mackenzie@trca.ca; karen.mcdonald@trca.ca; steve.varga@ontario.ca; gavin.miller@trca.ca; Dominik.Matusik@toronto.ca; Doris.Ho@toronto.ca; Valesa.Faria@toronto.ca; pavel.kopec@toronto.ca; kishmita.arora@toronto.ca;

RE: PH28.2 - 21 Windermere Avenue (1-154 Swansea Mews) - Toronto Builds - Official Plan and Zoning By-law Amendment Application - Decision Report – Approval

Dear Chair Councillor Perks, Vice Chair Councillor Nunziata and all Committee Members,

This is to communicate

Objection to adoption of the recommendation of staff Report to approve of the Toronto Builds application to amend the Official Plan and Zoning By-law to permit two mixed use buildings of 35 and 20 storeys with 649 residential units, including 154 rent-geared-to-income rental replacement units to be built at 21 Windermere Avenue (1-154 Swansea Mews) [Toronto Builds: 21 Windermere Avenue \(1-154 Swansea Mews\) – Official Plan and Zoning By-law Amendment Application – Decision Report – Approval](#)

And

Request for Deferral - not to proceed with this application until the Toronto Builds (proponent) fulfils the legal obligation to provide Natural Heritage Impact Study, in accordance with provincial standards, to demonstrate there will be no negative impacts on the Grenadier Pond Complex, Provincially Significant Wetland, its natural features or on their ecological functions or any risk of degradation to the quality and quantity of water, sensitive surface water features and sensitive ground water features, and their related hydrologic functions resulting from a proposed development at 21 Windermere Avenue (1-154 Swansea Mews).

Policies

Protected natural heritage (PSW, ANSI, ESA) in Ontario is guided by high level policies (the Planning Act, Provincial Policy Statements, now Provincial Planning Statement 2024) adopted into municipal plans. Toronto's OP to conform to PPS 2014 adopted [OPA 262](#) approved by the Province in May 2016. The OPA is in full force and effect included now in the OP Chapter 3.4 the Natural Environment Policies 3.4.14; 3.4.15. These policies must conform to PPS 2204: 4.1 Natural Heritage 4.1 - 4.1.8 to ensure ***"Natural features and areas shall be protected for the long term"***.

PPS 2024:

4.1 Natural Heritage 4.1 - 4.1.8

8. Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

Negative impacts: means

a) in regard to policy 3.6.4 and 3.6.5, potential risks to human health and safety and **degradation to the quality and quantity of water, sensitive surface water features and sensitive ground water features, and their related hydrologic functions, due to single, multiple or successive development.**

Negative impacts should be assessed through environmental studies including hydrogeological or water quality impact assessments, in accordance with provincial standards;

c) in regard to other natural heritage features and areas, **degradation that threatens the health and integrity of the natural features or ecological functions for which an area is identified due to single, multiple or successive development or site alteration activities.**

The City OP mandates Study for all proposals in adjacency to protected natural heritage, the ESA, the ANSI and the PSW.

Chapter 3.4 The Natural Environment Policies 3.4.14; 3.4.15 are high level policies adopted into city OP to conform to PPS 2014 under section 3 of the Planning Act. **PPS 2024 has not changed these policies.**

- These legal tools are not "red tape", but critical safeguards of our health and environment now and into future.

Proposal 21 WINDERMERE AVE application information

According to the information found under Application Number: 25250881STE04OZ 21 WINDERMERE AVE, <https://www.toronto.ca/city-government/planning-development/application-details/?id=5737674&pid=578855&title=21-WINDERMERE-AVE>

- Natural Heritage Impacts Study was not requested prior to Notice of Complete Application Issued 26/11/2025 – Completed. The submission meets the City’s minimum application requirements. The Complete Application Date is: 26/11/2025
- Provided information by Report [Toronto Builds: 21 Windermere Avenue \(1-154 Swansea Mews\) – Official Plan and Zoning By-law Amendment Application – Decision Report – Approval](#) is inaccurate and incomplete.

“Natural Heritage

The site is adjacent to the natural heritage system, an Environmentally Significant Area (ESA), and a Provincially Significant Wetland (PSW). Farther from the site is Grenadier Pond. Shadowing on these areas would be minor and limited to the winter months and later afternoon during the spring and fall equinoxes. The shadows associated with the proposed massing and building heights are not likely to have negative impacts on significant natural features or the natural heritage system.”

- **The Application Checklist** does not even indicate Grenadier Pond complex PSW, or vicinity of the ANSI/ESA.

“Environmental Planning

1. A Species at Risk (SAR) Screening assessment should be completed - this is to include any existing trees (e.g., Butternut) and assessment of any existing structures. This can be a condition of approval or could be done earlier.
2. No outlet(s) or overland flow directed to the adjacent natural features and areas.
3. The sun/shade study should be evaluated to ensure the proposal does not include any significant shadow effects on the West Pond. There is risk to natural features with reductions in sun (alteration of growing conditions, thermal alterations, etc.).
 - a. If there is higher risk of significant decreases in sun on the adjacent features, then consideration should be given to the impact of those changes on existing features and their composition”.
 - **HYDROGEOLOGICAL INVESTIGATION REPORT SWANSEA MEWS, TORONTO, ONTARIO** is not paying much attention to the Grenadier Pond, PSW at all: *“it would be anticipated that the open-cut trench excavation will happen to be below the local groundwater table. As such, groundwater control will be required during the construction.”*

“ 7.1 Natural Features

As indicated in Section 2.0, no areas of natural heritage & scientific interests, creeks, lagoons, wetlands or surface water bodies are located at the Site. The nearest water body named catfish pond or west pond is located approximately 50 m east/northeast of the Site, which is beyond the range of the estimated zone of influence. Therefore, there will be no impact on the natural features.”

In conclusion

The Grenadier Pond watershed contains highly permeable sands, and groundwater—which is clean, cool, and flows consistently—contributes approximately **50% of the total water flow** to the pond.

Here is why an NHIS is essential for a high-rise proposal in this location.

- **Protection of Groundwater Hydrology:** The PSW is partially groundwater-fed, with critical seepage *“Field studies carried out by Gartner Lee in 1993/94 confirm that ground water is actively entering through the sides of the pond”*. Even a temporary dewatering, would risk reducing the groundwater supply to the pond and endangering of the ecosystem.
- **PSW Designation:** Grenadier Pond was designated as a PSW in 2022. Under the Ontario Provincial Policy Statement (PPS) and City of Toronto Official Plan, development is generally prohibited on lands adjacent to significant natural features (like wetlands and Areas of Natural and Scientific Interest - ANSIs) unless it can be demonstrated by the Study there is no negative impact on the feature or its functions.

This proposal fails to demonstrate that there will be no negative impacts on the natural features or on their ecological functions and related hydrologic functions. The application Support documentation does not provide requested information.

At the community side of this issue, an alternative development concept was developed: The Swansea Park Alternative Proposal www.swanseapark.ca as a safe, sustainable, environmentally friendly, community centered development concept.

Yours sincerely,

Lenka Holubec, member of [ProtectNatureTO](#) and [HighParkNature](#)