

SWANSEA MATTERS — CRITIQUE MEMORANDUM
Community Consultation Strategy Report — What It Failed to Address
21 Windermere Avenue (Swansea Mews Revitalization) — March 2026

Document under review	Community Consultation Strategy Report, dated November 7, 2025, prepared by Bousfields Inc. on behalf of Toronto Community Housing Corporation (TCHC)
Reference documents	Bousfields Post-Meeting Summary Report, September 22, 2025 Zoom Webinar; City of Toronto Official Plan ss. 3.1.1, 5.5.1; Ontario Planning Act, 1990, ss. 17, 34; Municipal Code 415-38; National Housing Strategy Act, 2019, s. 4; TCHC Tenant Charter
Date of review	March 2026
Classification	Consultation Process Integrity Assessment

FINDING

The Community Consultation Strategy Report dated November 7, 2025 does not constitute a valid summary of or adequate response to the community input documented at the September 22, 2025 Zoom webinar. It treats community feedback as a threshold already crossed rather than as substantive input requiring documented response. It fails the evidentiary and procedural standards required under Ontario Planning Act ss. 17 and 34, City of Toronto Official Plan ss. 3.1.1 and 5.5.1, and the TCHC Tenant Charter.

1. What the September 22, 2025 Community Meeting Actually Produced

The September 22, 2025 Zoom webinar was attended by approximately 83 participants. The Bousfields Post-Meeting Summary Report — the document the Community Consultation Strategy Report claims to respond to — documents specific, substantive concerns across eight themes:

Height, density, and built form	Attendees questioned the rationale for the proposed height and density, raised concerns about shadow impacts on surrounding residential properties and Swansea Park, and requested that independent shadow and wind studies be conducted before any approval was sought.
Planning process and future engagement	Multiple attendees asked how decisions were being made, what criteria would determine the final design, and what future opportunities for meaningful participation would exist — specifically requesting confirmed in-person engagement formats with recorded outcomes.
Housing tenure and unit mix	Attendees asked about the proportion of market versus affordable units, the definition of affordability applied, and whether co-operative or community land trust tenure models would be considered.
Community and environmental infrastructure	Concerns were raised about school capacity at Swansea Junior and Senior Public School, the adequacy of Route 77 Runnymede — the only TTC bus link between High Park and Humber River — and environmental impacts

	including contamination and proximity to the High Park Environmentally Significant Area.
Traffic and parking	Specific questions were raised about traffic studies, on-site parking allocation, construction-phase traffic management, and Windermere Avenue access.
Open space and amenities	Attendees raised the absence of formal parkland dedication, the adequacy of proposed community space, and ground-level design.
The engagement process itself	Multiple attendees questioned whether the process was genuine or whether the outcome was predetermined, and requested that the Swansea Park alternative proposal by local architect David Peterson be formally presented at future sessions.
Demolition and construction sequencing	Questions were raised about the timeline for demolition, construction phasing, and the duration of displacement for the 108 households with a right to return.

These eight themes are documented in Bousfields' own Post-Meeting Summary Report. They are specific, substantive, and traceable. They constitute the evidentiary baseline against which the November 7, 2025 Community Consultation Strategy Report must be assessed.

2. What the November 7, 2025 Strategy Report Actually Does

The Community Consultation Strategy Report was prepared forty-six days after the Zoom webinar. It is structured as a forward-looking engagement plan: it organises future consultation activities, identifies tools to be used, and describes the project's key themes. What it does not do is provide a traceable, point-by-point response to the concerns documented at the September meeting.

The report references the September 22 meeting under the heading 'What We Have Heard' and identifies general thematic clusters. But it does not:

- Name any specific question or concern raised by any attendee at the September meeting
- Explain how any specific concern has been incorporated into the design, or why it has not been
- Acknowledge the shadow impact concerns or commit to independent shadow and wind studies
- Address the school capacity or transit adequacy questions in any substantive way
- Acknowledge the community's expressed preference for a lower-scale, ground-oriented built form rather than high-rise towers
- Acknowledge the Swansea Park alternative proposal, publicly available and known to TCHC by the date of the report
- Engage the tenure model questions raised at the September meeting
- Confirm in-person engagement formats as explicitly requested by attendees

Instead, the report treats the September meeting as a completed milestone — feedback received, themes noted, process advancing — and pivots to describing future engagement. The feedback is not carried forward as an obligation to be fulfilled. It is classified as input already received and absorbed.

A consultation strategy report that follows a community meeting is the institutional record of what the community said and what the applicant intends to do about it. When that record omits the specific content of what was said and substitutes general thematic clusters for traceable responses, it does not satisfy the evidentiary requirements of a consultation record. It produces the appearance of responsiveness without the substance.

3. Specific Deficiencies

3.1 Height, Density, and Built Form — Not Engaged

The September meeting generated documented concerns about the height and density of the proposed development. Attendees specifically questioned the rationale for high-rise towers and requested shadow and wind studies. The November 7 report's 'Proposal Highlights' section describes the built form without referencing these concerns and without committing to any independent studies. The design is presented as settled. This is not a minor omission. The community's preference for a lower-scale, ground-oriented built form — expressed consistently across the September meeting, the November 20 Open House, and the February 26, 2026 Committee deputations — was the single most consistently documented concern in the entire consultation record.

3.2 Shadow and Wind Studies — No Commitment Made

Attendees at the September meeting asked whether shadow and wind impact studies would be conducted before any approval was sought. No commitment to such studies appears in the November 7 report. The February 2026 Decision Report eventually references a wind study, but the absence of any commitment in November meant the community had no confirmed basis for evaluating the proposal's impact on Swansea Park, surrounding residential streets, and the school grounds — all materially affected by a 35-storey tower.

3.3 School Capacity and Transit — Mentioned but Not Addressed

Swansea Junior and Senior Public School serves the immediate neighbourhood and is operating in facilities rated at 84.1% below the state of good repair. Community members raised school capacity concerns at the September meeting. The November 7 report mentions infrastructure generically but provides no analysis of school capacity, no evidence of engagement with the TDSB, and no commitment to a capacity study before approval. Route 77 Runnymede — the only TTC bus connection between High Park and Humber River — appears nowhere in the report despite being the subject of documented community concern.

3.4 The Swansea Park Alternative Proposal — Withheld from the Consultation Record

The Swansea Park alternative proposal, prepared by local architect David Peterson and publicly available at swanseapark.ca, was known to TCHC by November 7, 2025. It proposes 14 mid-rise buildings, 60% open space, mass timber construction, and 331 to 461 units — a materially different built form that directly addresses the community's stated preference for lower-scale, ground-oriented housing. The November 7 report does not acknowledge its existence.

A consultation strategy document that does not account for a credible, publicly available alternative proposal cannot claim to represent the full range of community input. The omission is not incidental. The community explicitly asked, at the September meeting, for the Swansea Park proposal to be presented at future consultation sessions. That request went unanswered.

3.5 'What We Have Heard' — Insufficient as a Consultation Record

The report's 'What We Have Heard' section lists general themes without specificity, attribution, or response commitments. It does not distinguish between concerns addressed in the design and concerns that remain open. It does not indicate which feedback shaped which design decisions. It does not commit to carrying unresolved concerns into subsequent engagement stages. As a public accountability document, it fails the minimum standard of traceability.

3.6 In-Person Engagement Format — Not Confirmed

Attendees at the September meeting explicitly asked whether future sessions would be in-person. The November 7 report references an Application Information Centre as the next event but does not confirm format or in-person access. The AIC that followed — the November 20 Open House — was held in a school basement with five business days' notice, no wheelchair access, no exterior signage, no formal recorded proceedings, and a permit window too short for the size of the community that attended. That outcome was not inevitable. It was a direct consequence of a consultation strategy that imposed no binding format commitments.

4. Legal and Policy Framework

Ontario Planning Act, 1990, ss. 17 and 34 require that public consultation provide notice and information sufficient for meaningful participation. City of Toronto Official Plan ss. 3.1.1 and 5.5.1 require that consultation give residents a genuine opportunity to shape built form outcomes — not merely to receive information about decisions already made. A consultation strategy document that does not carry documented concerns forward as obligations does not meet these requirements.

The National Housing Strategy Act, 2019, s. 4 requires that federally-funded housing programs advance meaningful participation. The TCHC Tenant Charter commits TCHC to honest, transparent, and proactive engagement with affected tenants. A consultation strategy document that omits the existence of a credible alternative proposal from the engagement framework it describes is inconsistent with both obligations.

Applicable law: Ontario Planning Act, 1990, ss. 17, 34 — meaningful participation as a statutory requirement; City of Toronto Official Plan ss. 3.1.1, 5.5.1 — community shaping of built form outcomes; Municipal Code 415-38 — consultation standards; National Housing Strategy Act, 2019, s. 4 — meaningful participation as federal funding condition; TCHC Tenant Charter — honest, transparent, and proactive engagement with tenants and community.

5. What a Compliant Consultation Strategy Would Contain

A consultation strategy document that met the requirements of the Planning Act, the Official Plan, and the TCHC Tenant Charter would:

- Map each documented concern from the September 22 meeting to a specific design response, study commitment, or formal explanation of why the concern cannot be accommodated — with the responsible party named and a timeline confirmed
- Acknowledge the existence of the Swansea Park alternative proposal and provide a formal rationale for why it is or is not being included in consultation materials presented to the community
- Commit to specific, binding engagement formats — including in-person sessions, formal recorded proceedings, and confirmed reporting back on how each session’s input was incorporated
- Confirm the status of shadow, wind, school capacity, and transit studies as prerequisites for meaningful engagement at the next stage — not as deferred outputs
- Confirm that former Swansea Mews tenants, many rehoused across the city, will receive proactive individual notice of each consultation event — not only Canada Post-dependent mail drops to the original address
- Identify the specific mechanism by which community input at each stage will be incorporated into the design record, and how that incorporation will be documented and reported to the community

6. Conclusion

The November 7, 2025 Community Consultation Strategy Report fails to meet the evidentiary and procedural standards required of a consultation record under Ontario planning law, the City of Toronto Official Plan, and the TCHC Tenant Charter. It does not engage the specific, documented concerns raised at the September 22 meeting. It does not acknowledge a credible alternative proposal known to TCHC at the date of its preparation. It does not commit to the in-person, recorded engagement formats requested by attendees. It treats community input as a milestone already passed rather than an obligation to be fulfilled.

These are not process formalities. The community at the centre of this process consists of 108 displaced households who have been out of their homes since May 2022 and who depend on TCHC for temporary accommodation. Their engagement with the consultation process is not voluntary civic participation — it is their only available mechanism for influencing decisions that

will determine the form, scale, and tenure of the homes they will return to. A consultation strategy document that does not meet the minimum standard of documented responsiveness is not a minor procedural gap. It is a governance failure that shaped every consultation event that followed.

CONCLUSION

The November 7, 2025 Community Consultation Strategy Report does not constitute a valid or compliant consultation record. It must be supplemented with: (1) a point-by-point response to the concerns documented in the September 22, 2025 Bousfields Post-Meeting Summary; (2) a formal acknowledgment of the Swansea Park alternative proposal and its standing in the consultation record; and (3) binding commitments on engagement format, notice standards, and feedback reporting for all subsequent consultation stages.