

Thomas G. Giglione
Managing Director, We Agree Mediators
216-240 Lake Promenade
Etobicoke, Ontario, L8W 1B2
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October 1, 2024

Ontario Land Tribunal
655 Bay Street, Suite 1500
Toronto, ON M5G 1E5

Attn: Tribunal Case Coordinator, Ryan Co (Ryan.Co@ontario.ca)

Re: OLT Case No.: OLT-24-000882
OLT Lead Case No.: OLT-24-000882
OLT Case Name: The Lake Promenade Real Estate Co-Tenancy v. Toronto (City)

Proceeding Commenced Under Subsection 22(7) of the Planning Act, R.S.O. 1990, c. P.13, as amended

Applicant and Appellant: The Lake Promenade Real Estate Co-Tenancy
Subject: Request to amend the Official Plan – Failure to adopt the requested amendment
Reference Number: 23 134668 WET 03 OZ
Property Address: 220, 230, and 240 Lake Promenade and 21 and 31 Park Boulevard
Municipality/UT: Toronto/Toronto

Proceeding Commenced Under Subsection 34(11) of the Planning Act, R.S.O. 1990, c. P.13, as amended

Applicant and Appellant: The Lake Promenade Real Estate Co-Tenancy
Subject: Application to amend the Zoning By-law – Refusal or neglect to make a decision
Reference Number: 23 134668 WET 03 OZ
OLT Case No.: OLT-24-000883
OLT Lead Case No.: OLT-24-000882

Proceeding Commenced Under Subsection 51(34) of the Planning Act, R.S.O. 1990, c. P.13, as amended

Applicant and Appellant: The Lake Promenade Real Estate Co-Tenancy
Subject: Proposed Plan of Subdivision – Failure of Approval Authority to make a decision
Reference Number: 23 134682 WET 03 SB
OLT Case No.: OLT-24-000884
OLT Lead Case No.: OLT-24-000882

To the attention of:

Tribunal Case Coordinator Ryan Co at Ryan.Co@ontario.ca.

On the same day that documents are submitted to the Tribunal, electronic copies are to be submitted to:

APPLICANT/APPELLANT

The Lake Promenade Real Estate Co-Tenancy

Michael Foderick, mfoderick@mccarthy.ca

Jamie Cole, jpcole@mccarthy.ca

MUNICIPALITY

City of Toronto

Amanda Hill, amanda.hill@toronto.ca

Ariel Lo-Wong, Ariel.Lo-Wong@toronto.ca

Dear All Parties Concerned;

I **Thomas G. Giglione**, Managing Director of **We Agree Mediators** and a resident at **216-240 Lake Promenade**, submit this letter to formally oppose the proposed development at **220, 230, and 240 Lake Promenade**, and **21 and 31 Park Boulevard**, for the reasons detailed below. This opposition represents not only my personal interests as a resident of the area but also a broader concern for the community's future well-being, the environment, and the integrity of our neighbourhood.

I. Personal Impact and Displacement

As a resident of **240 Lake Promenade**, I live with my wife and three children, all of whom will face direct harm from this project. The proposal involves demolishing the current buildings, displacing over 500 families in the largest reported "demoviction" in Canadian history

It is impossible to find similarly affordable housing in Toronto's market for families like mine on fixed incomes. The prospect of displacement terrifies me as we face a three-to-five-year wait for subsidized housing, and alternatives are simply unaffordable.

Furthermore, my children attend **James S. Bell School**, a school that is already operating beyond full capacity where my children participate in classes with over 30 students per class and are in combined Grade 2 and 3 and Combined Grade 3 and 4 because there are not enough teachers budgeted by the Toronto School Board for the school's needs.. The influx of up to **2100 new market-rate housing units**, comparable to adding the population of a small town onto a single block, would overwhelm the local schools, roads, and other services. Families like mine, and those with children and seniors, would have to endure years of construction noise, traffic, and environmental hazards, negatively affecting our children's education, daily lives, and well-being.

II. Violation of Planning Act Principles

The proposed development violates several principles outlined in the **Planning Act**:

- **Section 2(h)** calls for the orderly development of safe and healthy communities. Forcing residents to live on an active construction site for over a decade—surrounded by noise, pollution, and hazards—compromises our safety and the health of our families.
- **Section 2(j)**, which requires the provision of adequate affordable housing, is clearly ignored in this case. The development will remove significant amounts of affordable housing in an area where such housing is already in crisis, pushing out long-term residents who cannot afford to stay.
- **Section 2(n)** promotes development that preserves a sense of place. This project threatens to replace a close-knit, well-established community with a transient population driven by market-rate housing, dramatically altering the character of Lake Promenade.
- **Section 2(q)** emphasizes sustainable development. The removal of over 150 mature trees, many with large canopies that provide critical environmental benefits, severely impacts the local ecosystem, reduces green space, and exacerbates the carbon footprint.

III. Case Studies of Negative Impacts

Evidence from other large-scale developments in Toronto further illustrates the negative outcomes we face if this project proceeds:

1. **Humber Bay Shores Development (2010-2020)** led to massive traffic congestion on Lake Shore Boulevard West, while schools in the area became so overcrowded they had to rely on portable classrooms. This development decreased the overall quality of life, particularly for families.
2. **CityPlace Development (2003-2020)** resulted in a 40% increase in emergency response times due to insufficient infrastructure planning. Property values for surrounding single-family homes dropped significantly, and the community struggled with insufficient roads and public transit.
3. **Liberty Village Redevelopment (2004-2018)** showed a severe disruption of small businesses and the creation of a "transit desert," as overcrowded streetcars and buses couldn't accommodate the new population.

IV. Human Rights Concerns and Environmental Damage

The project poses significant risks under the **Ontario Human Rights Code**, particularly **Section 2**, which guarantees equal treatment concerning accommodation, and **Section 11**, which protects against constructive discrimination. By failing to provide affordable housing alternatives, this project disproportionately affects vulnerable groups, including low-income families and seniors, as seen in *Sandalwood Parkway Group Ltd. v. Peel (Regional Municipality)*

Environmentally, this development would cause irreparable harm to our neighbourhood's green space, including the removal of large canopy trees. The permanent loss of these trees—over **80 protected trees**—will reduce air quality, destroy wildlife habitats, and leave our area vulnerable

to flood risks due to increased hard surfaces. The climate impacts are significant, as the destruction of green spaces contradicts Toronto's environmental goals.

V. Long-Term Consequences for the Community

This development represents a massive overreach, affecting every aspect of life in **Long Branch**. Residents will lose access to **Lake Ontario**, the **Waterfront Trail**, and local parks. The area will be subject to over a decade of continuous noise, dust, and construction hazards. Critical infrastructure such as **community centers, roads, libraries, and schools** are already strained, and this project will make them even more inadequate for the increased population.

The project would also lead to **gentrification**, pricing long-time residents out of their homes and transforming the area into a high-cost enclave that serves developers at the expense of local families..

VI. Conclusion

In light of the overwhelming evidence of harm to the community, environmental degradation, and the violation of legal principles under the **Planning Act** and **Human Rights Code**, I urge the Tribunal to reject this proposal. The cost to the people of Lake Promenade—our families, seniors, and future generations—is too high. This development will dismantle a thriving community and replace it with instability, loss, and irreversible environmental harm.

I request to be registered both as **Party and Participant simultaneously** in this matter. Namely We Agree Mediators as a party and Thomas G. Giglione as a participant

According OLT Rule 8.1 I recognize and acknowledge that OLT Tribunal's rules indicate that party and participant statuses are distinct, and no provision explicitly prevents a company and the same representative person acting as a participant to hold both statuses as party and participant simultaneously.

and ask for an independent, comprehensive impact study before any further consideration of this application. I will remain deeply engaged in ensuring that the voices of my community are heard and that our neighbourhood's future is safeguarded.

Sincerely,



Thomas G. Giglione

Managing Director, We Agree Mediators
Co-Chair, James S. Bell School Council
Member, Long Branch Neighbourhood Association



Ontario Land Tribunal

655 Bay Street, Suite 1500, Toronto, ON M5G

1E5

Tel: 416-212-6349 | 1-866-448-2248

Web Site: olt.gov.on.ca

Party Status Request Form

This form is expected to be provided at least 10 days in advance of the first hearing event to the Tribunal and all parties. Please contact the assigned Tribunal Case Coordinator to verify the relevant contact information for the parties. (A paper copy of this form must also be provided to the Tribunal Member when the event is in person).

IMPORTANT: This form is your written request for party status. The presiding Tribunal Member will consider your request at the hearing event and will provide a determination on whether to grant you party status.

Request Date (yyyy/mm/dd):

Case Information

Tribunal Case Number:

Date of Case Management Conference/Hearing (yyyy/mm/dd):

Contact Information

Last Name:

First Name:

Company Name:

Telephone Number:

E-mail Address:

Representative Contact Information (if applicable)

Last Name: Giglione

First Name: Thomas

Company Name: We Agree Mediators

Telephone Number: 437-556-8558

E-mail Address: thomas@weagreemediators.com

I certify that I have written authorization to act as a representative and I understand that I may be asked to produce this authorization at any time.

Status Request Details

A person who is authorized to participate in a proceeding as a party may participate fully in the proceeding in accordance with Rule 8 of the OLT's Rules of Practice and Procedure.

In the space below, please provide an outline of your interest and an explanation as to how your involvement will help the Tribunal resolve the issues raised in the appeal. You may also provide documentation or attachments to support your request:

(See attached)

Notes:

Last Name: Giglione

First Name: Thomas

Company Name: We Agree Mediators

Telephone Number: 437-556-8558

Email Address: thomas@weagreemedi

- I certify that I have written authorization to act as a representative and I understand that I may be asked to produce this authorization at any time.

Status Request Details and Participant Statement

A person who wishes to participate in a proceeding as a participant (and not a party) may only make a submission to the Tribunal in writing in accordance with section 17 of the Ontario Land Tribunal Act and Rule 7.7 of the OLT's *Rules of Practice and Procedure*.

In the space below, describe your interest in the case, your position on the issues and an explanation of your reasons in support of your position. You may also provide documentation or attachments to support your request. The information you provide will be your participant statement.

Participant Statement

(SEE ATTACHED)



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Important: This form includes your written request for participant status and your participant statement. The presiding Tribunal Member will consider your request and the participant statement provided below at the hearing event prior to determining whether to grant you participant status and accept your participant statement.

Date:

Case Information

Tribunal Case No.:

Date of Case Management Conference/Hearing:

Contact Information

Last Name:

First Name:

Company Name:

Telephone Number:

Email Address:

Representative Contact Information (if applicable)