Appendix G:

Divisional Comments on TDSB Potential School Closures: Children's Services Division, City Planning; Parks, Forestry and Recreation Division.

1. Children's Services Division Comments

Ontario's Ministry of Education has provincial responsibility for both child care and education. This governance structure is meant to provide clear direction for a coordinated early learning system.

As child care's move to the Ministry of Education is fairly recent, some of the Ministry's polices have not been aligned to completely integrate child care with education.

An example of such a policy is how school utilization rates are measured. Child care centres located in schools have not been taken into consideration when measuring school utilization at the TDSB. This puts some child care service in jeopardy as school closures are being considered. Families consistently identify schools as their preferred location for accessible and more seamless services. A total of 25,187 children currently receive child care in TDSB schools, representing 40 per cent of Toronto's licensed child care spaces. There is already insufficient physical capacity in Toronto's child care sector: less than 20 per cent of Toronto's children age 0-12 can be accommodated by existing licensed child care spaces. A loss of spaces in schools will further erode child care capacity, putting families and children at risk and limiting workforce participation. The size and impact of child and family services delivered in a school should be a key criterion in the school closures review process.

Furthermore, in 2012 the Ministry made available new capital funding for child care in schools. The City and school board staff worked closely together to identify sites for capital investments. Many of the sites that were selected are now on the potential school closure list. This is inefficient with respect to staff time and risks the security of tenure in school-based child care. Recent and planned capital investments in school-based child care centres should also be included as a criterion in the school closure review process.

There is a pressing need to maintain current child care service levels in Toronto. But when schools are closed, there is no guarantee that a child care centre will be able to operate in a new school location, as space would be expected to be used to accommodate incoming pupils. This is especially true for infant, toddler and preschool spaces, which require exclusive space to operate for the full day. The chart below shows the child care centres in schools that are on either the TLC or PARC lists. Organized by ward, the chart gives the number of child care spaces at risk, by age group, if the school were to close. It also indicates whether the school is in a priority area for investment based on insufficient capacity in the ward, and whether the school site has been selected for capital investment under the Province's Schools-First Child Care Capital Retrofit Policy (in the EL4 column).

In conclusion, the City is the service system manager for child care in Toronto. In this role, the City works closely with school boards to plan child care services. Because of this partnership, and because closures may impact child care service levels, the City should be consulted as part of the school closure review process to ensure that the full use of the school is taken into consideration. Other child and family services in schools also serve important needs. These include family support and early identification and intervention services that locate in schools to provide accessible service to families.

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2. City Planning Comments

2.1 Planning for Future Growth

Toronto is a mature urban area with a current population of 2.8M people, that is forecasted to grow to 3.2M by 2031 and 3.4M by 2041. The city's growth occurs through incremental infill development as well as larger scale regeneration and revitalization initiatives. Existing communities also grow and change over time. As a result, the potential disposition of school sites must be carefully assessed against the future growth and natural life cycle changes of the various communities throughout the City. The four City interests identified in this report (noneducational use, parkland, childcare facilities, growth and heritage) must consider the future needs that will be required to manage growth and support neighbourhood change over the lifetime of the city. In addition, City Planning has identified that due to the overall age of the school facilities under consideration, there is significant potential for heritage value which should be assessed by the TDSB prior to disposal. Schools cannot be assessed based on the existing snapshot of the community today, its current population, social needs, services and facilities. The dynamic nature of the City and the communities that define it require spaces and facilities to respond to change. The opportunity to establish new school facilities is both limited in terms of access to appropriate sites and costly, given the high land value. These facilities provide a value far beyond their current use, they offer communities the opportunity to change and reinvent themselves. They serve as the breathing space that dense urban areas need to allow for flexibility, innovation and support to the communities around them.

The TDSB's potential disposition of TLC sites and review of sites through the PARC process, will need to be informed by growth and change across the City. TDSB staff wants to work with City staff to ensure that they are capturing this information as part of their upcoming public review processes. A preliminary assessment of the school sites against where future growth is anticipated in the Official Plan, applications received through the development approvals "pipeline" (applications under construction, approved and or under review), as reflected in the City's population growth projections, and through neighbourhood change was undertaken. A number of these school sites are located in growth areas. In discussions with TDSB staff, it is clear that they have undertaken significant work to inform the review of the identified sites. In some cases, poor enrollment in specialized programs has resulted in effectively closing facilities through student self-selection. In other cases, the actual school facility is extremely small and is unable to support the full curriculum. Only through working in collaboration with the TDSB and sharing information can we ensure that a fully informed review and assessment is undertaken.

The highlights of the growth and heritage review include:

- Patterns of household occupancy will result in changing demand for neighbourhood schools. Eleven of the properties on the TLC inventory and 37 of the schools identified by the TDSB for Pupil Area Review are serving stable neighbourhoods.
- The potential impact of more families living in high-density housing needs to be considered, particularly in growth areas, *Centres, Downtown and Central Waterfront*, and *Avenues*;
- Schools' locations within neighbourhoods promote walkability and community health;

- Current and future Growth Studies will continue to assess the need for school programs and facilities and should be a considered in the disposition school assets;
- The assessment of school utilization rates should be repositioned to account for school facilities as a community <u>asset</u> and <u>hub</u>, as supported by the Premier's directives and Official Plan policy;
- The TDSB should include an assessment of Heritage Potential for all facilities over 40 years old prior to any disposition or change of use so that schools that are landmarks or buildings of architectural significance can be preserved. Presently, the PAR list has one Listed and one Designated property on the City's Inventory of Heritage Properties.

2.2. Preserving the Asset: Understanding Long-Term Need for Neighbourhood Schools

Patterns of household size and occupancy

The TDSB's map of PARCs to be undertaken between 2014 and 2020 shows clusters of schools in the areas where limited growth is projected to occur. However, through the life cycle change of neighbourhoods and turnover of the existing housing stock, population growth is anticipated over the next twenty years. Staff have analyzed trends in household occupancy (as identified in *Flashforward* and the 2012 bulletin: *Trends in Household Occupancy*), which show that the rates of occupancy of housing types for households likely to be raising families will increase in the *Neighbourhoods* and *Apartment Neighbourhoods* over time, with the next wave of occupants being larger households with children and need for schools.

Historically the construction of local schools in Toronto has closely followed the pattern and pace of residential development. Historic patterns of household occupancy for low-rise housing in Toronto's neighbourhoods indicate that household size is at its largest at the period of first construction, or soon after. This is the time when households seeking to raise a family move in and start having children. When schools were constructed to support this growth in population, they experienced some of their highest years of full time enrollment.

This pattern of household occupancy appears to be linear, but is in fact part of a repeating demographic pattern. As identified in *Flashforward*, areas in the city where households are increasing in size, those likely to have more school-aged children per household, are located in neighbourhoods with the following housing stock:

- single- and semi-detached houses;
- row houses;
- low rise housing;
- or in areas of the City with apartment buildings constructed in a period when unit sizes were sufficient to accommodate families.

This pattern is significant because *Neighbourhoods* and *Apartment Neighbourhoods* which are the locations of the cyclical pattern of decline and rise in household size make up 48% of the overall area of Toronto. Eleven of the properties on the TLC inventory and 37 of the schools identified by the TDSB for Pupil Area Review are serving these areas.

Families in high-density housing

Understanding the new trend towards families raising children in high-density housing is important. Thirty-three of the schools identified for Pupil Area Review are located in the *Centres, Downtown*, and *Avenues* and six are located in other areas of the City where growth is occurring through private development.

Areas with the highest rates of growth in Toronto are in *Centres, Downtown and Central Waterfront*, and the *Avenues*, where the dominant type of construction has been mid- and high-density housing of 5 or more storeys. This trend in construction has been supported by the market which demonstrates a strong and sustained demand for this type of housing. However, there is projected a significant demand for ground-related housing, to meet the needs of larger households (typically families with children) and an anticipated mismatch between projected demand and the anticipated supply. For those households wishing to stay within Toronto, the alternative housing options to low-rise dwellings has increasingly become mid- and high density housing. The numbers of households with children that are remaining in high density housing over the long term is not yet known; however, that households are raising children in high density housing indicates the need for school facilities in areas where this type of housing is the predominant form.

Population Growth in Toronto

The City's population projections show that the proportion of children in the entire population is stable and the absolute number of children, in particular school-aged children, is increasing. Toronto is on track to meet the forecasted growth to 2031 of over 3,190,000 residents as anticipated by the Provincial *Growth Plan for the Greater Golden Horseshoe* as amended in 2013. Although the average household size has decreased over time, and families are having fewer children, population projections based on Provincial forecasts anticipate that children (aged 0-14) are unlikely to decrease as a percentage of the whole population. In fact, from the 2011 census year, the percentage of children aged 0-14 will increase 6% over the previous Census, remaining stable at 16.7% of the overall population of Toronto.

2.3 Schools' Role in Maintaining Walkable Neighbourhoods

The physical proximity of households to schools is one of the key factors that influence transportation choices for parents with school-aged children. The trend to centralize schools in Ontario is having a negative impact on the ability of children to use forms of active transportation to travel to their local school. Data show that school vehicle trips are a major source of congestion on our roads. Within the Greater Toronto and Hamilton Area (GTHA), 22% of total trips in the morning peak period are related to school drop-offs (Transportation Tomorrow Surveys, 1986-2006). In addition to increased vehicle trips, vehicle drop offs have a detrimental impact on the residential neighbourhoods near schools, including an impact on the overall safety of pedestrians. Beyond transportation impacts, Toronto Public Health has pointed to the increased rate of children being driven to school as a contributor to childhood obesity rates.

2.4 Planning for Growth and Increased Enrolment Needs

Toronto's Official Plan and Growth Areas

The Provincial *Growth Plan for the Greater Golden Horseshoe* as amended in 2013 anticipates that the City's population will grow to 3.19 million by 2031, an increase of over 500,000 residents from 2011. While the majority of the 163,833 new residential units proposed through development applications received between 2009-2013 are located in the *Downtown and Central Waterfront*, the *Centres*, and the *Avenues*, over 22,000 units have been proposed across the rest of Toronto.

Toronto is a mature city with high land costs which place considerable constraints on the ability to accommodate future school facilities within the existing urban fabric. The TDSB is aware that schools with a low utilization rate *today* need to be available to house future school-aged population in the medium- and long-term, and accommodate future needs. Without the ability to levy Development Charges, which would contribute to the cost of construction for new facilities, the TDSB must carefully manage their existing assets to plan for future growth. Identifying and maintaining *Core Holdings* will allow the TDSB to re-open facilities when populations change, and enrollment increases. In addition to educational requirements, growth places extra demands on all community facilities, including schools. Schools (the building and their recreational fields) provide key community facilities that help Toronto accommodate the social and recreational needs of residents as populations increase.

Growth Studies: the next frontier of residential development

Growth Studies are a method for staff to analyze the medium- and long-term housing potential for specific areas of the City and what community facilities will be required to serve new populations. Areas are selected for Growth Studies based on a number of criteria:

- they may be located within one of the Official Plan areas, noted above, for which more detailed analysis is required,
- are areas where City Planning is considering a change of land use designation (e.g. from *Employment Areas* to *Regeneration Areas*), and
- where there is new development interest that was not previously contemplated through the existing planning framework.

Recommendations for new facilities, including schools, are based on the likelihood that the public will have access to existing community facilities, which is particularly crucial where populations are expected to grow. For example, the planning framework emerging from the Port Lands Acceleration Initiative, with a horizon of over 20 years, has not identified the need for a new secondary school to serve the new community of residents based on the cluster of secondary schools located immediately north of the study area, near Danforth Avenue. In the example of Growth Studies in *Regeneration Areas*, the potential for new populations to be accommodated, where no residential uses previously existed, is assessed. In particular, these studies consider whether new populations will have access to existing local schools in nearby *Neighbourhoods*, or if they will require new facilities.

As City Planning launches a new set of growth studies in 2015 and 2016, staff will continue to engage the school boards as stakeholders. These processes should inform the upcoming PAR processes in that the TDSB will be involved in the City's planning for new residential populations that will require access to schools.

2.5 Complete Communities with Active Facilities: Broadening Asset Utilization Rates

This evolution of schools as public assets should be encouraged and recognized by the Province. Agencies and communities across the City, with the support of the TDSB, have repurposed these facilities successfully. This has served both an interim benefit and has preserved the school asset to address potential future growth and change.

City Planning staff are of the opinion that the most important consideration for the TDSB regarding the future of its facilities is the *Asset* utilization rate. Asset utilization rates would assess more than the full time enrollment of pupils (which is the standard for the School Utilization Rate), accounting for each facility's overall use in the community. In many instances, non-educational users are funded by other provincial ministries, who are accessing schools to provide services from a public facility. Understanding that school facilities are providing locations for the delivery of publically funded services changes the framework for assessing schools from closing facilities, to closing the funding gap (required to continue their use as community assets).

This position is supported by Official Plan policy 3.2.2.4 which specifically identifies that schools are community resources that serve as socio-cultural centres and sources of valuable community open space as well as educational facilities. Through this policy, Council has supported acquiring publicly owned school sites should they no longer be needed as learning institutions.

Additionally, the Mandate Letters, issued to the provincial ministries from the Office of Premier specifically identify that the Ministries of Education, Health and Long Term Care, Municipal Affairs and Housing, with other ministries should develop a policy on community hubs to make efficient use of public assets, and strengthen ties between schools, community organizations, and municipalities. This directive supports existing Official Plan policy 3.2.2.3 which identifies that shared use of municipal and/or school facilities should be encouraged. Despite being a shared objective across provincial ministries and the City of Toronto, preserving school facilities for use as community hubs does not have standing in the Education Act's regulation related to the disposition of surplus property.

2.6 Heritage: Schools are Part of the City's Landscape

Preserving schools with heritage value is a relevant issue in that these are community assets that support walkable, sustainable neighbourhoods; they are among the most important structures in Toronto's communities, often built to a level of detail and craftsmanship rarely found in other buildings. Presently, the PAR list has one Listed and one Designated property on the City's Inventory of Heritage Properties. Under Provincial guidelines, however, buildings that are over 40 years old should be assessed for Heritage Potential rendering virtually all of the sites on the

TLC and PAR list as having potential heritage value. Where a heritage building is no longer viable through its original use, an adaptive re-use may be the only way to preserve its heritage significance and reinvigorate a neighbourhood.

Staff recommend that a Statement of Significance should be completed for each property deemed to have heritage significance before a property is recommended for change of use or disposal. Where new development is proposed on properties sold by the TDSB, staff will assess the Statement of Significance and may use the Statement to enact the appropriate by-laws or easements to retain school's heritage value.

3. Parks, Forestry & Recreation Division Comments

3.1 School Land

School sites are an important part of Toronto's Parks and Open Space System. School sites complement the parks system by providing shared use community green space, links between community assets, sports fields and playgrounds. The loss of school sites has three important impacts on the municipal park system.

First, in neighbourhoods with low parkland provision school sites serve as local parks, providing valuable green space for active play and passive leisure. Schools are important community assets throughout the city but in many areas, school properties were planned as the only community open spaces in those neighbourhoods. The loss of the community lands in those areas cannot be replaced.

Although the City is interested acquiring all surplus school sites, Parks, Forestry & Recreation is particularly interested in the properties in areas of low local parkland provision or where the school land is adjacent to existing parks. Areas of the City with low parkland provision are identified as being in the lowest two quintiles on Map 8(B) in the Official Plan. Acquiring school properties adjacent to existing parks creates an opportunity to expand existing parks and create more recreational, leisure and environmental opportunities within the community.

Secondly, the loss of public access to school sites has an increased impact on the use and demand for public parks. School properties provide amenities such as sports fields, playgrounds, gardens and special facilities for community use in the evenings, weekends and holidays. The loss of the school site and those amenities negatively impacts the local community and increases pressure on the whole Parks and Open Space System to meet a new demand. Existing residents and new residents resulting from the development of the surplus school site put more pressure on the parks, resulting in higher operating costs for equipment inspection and repair, litter pickup, solid waste management and turf maintenance.

The third negative impact of school land disposal concerns the loss of community access to sport fields. The loss of the school field reduces the supply of evening and informal neighbourhood sport opportunities as well as potentially increases the pressure on existing sport fields in parks through displaced school activities or permitting. There is rising demand for sports fields and

many City-operated sports fields already have high use or over use. Thus the City is especially interested in school lands that include quality or strategically important sport fields. Additional data on the number and quality of sport fields is required to support this analysis for future surplus sites.

3.2 School Facilities

A proportion of schools being considered for disposal are used by Parks, Forestry & Recreation as locations for recreation programs including active living general interest, swimming, camps and affordable After school Recreation and Care. The school buildings have gymnasiums, pools, auditoriums, meeting rooms and multi-purpose rooms that are used for regular programs or permitted events. The closure of schools will impact non-education services provided by Parks, Forestry & Recreation and other service providers.

The City's Official Plan Policy 3.2.2.4 states that "... The City will consider acquiring publically owned school sites [...] for parks and open space purposes should they no longer be needed as learning institutions". The City reviews school sites that are circulated under Ontario Regulation 444/98 for opportunities to acquire for parks and recreation purposes. From 2012-2014, the City acquired three surplus school sites for new parks. These new parks will preserve green space and ensure the public asset is available for the future. Limited funding for acquisition means that not every school site can be acquired by the City and many community assets will be lost. Rigorous assessment of the impacts to parkland and non-education services/programs should be included as a criterion in the school disposal review process.