Toronto District School Board

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June 6, 2018

VIA EMAIL ONLY: pgmc@toronto.ca

Attention: Nancy Martins
Chair and Members
Planning and Growth Management Committee
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Re: TDSB Request for Adoption of Additional Recommendation
City of Toronto Official Plan Amendment 405 (OPA405)
Yonge Eglinton Secondary Plan
PGM Committee, Item PG30.4, Ward 16, 22, 25, 26

The Toronto District School Board (TDSB) was pleased to have had an opportunity to participate in, and contribute to, the development of the proposed policies which form the recommended Yonge-Eglinton Secondary Plan (YESP or OPA405).

The TDSB has reviewed and considered the Report and the Recommendations contained therein from the Chief Planner and Executive Director, City Planning and is very supportive of the approach and much of the policy content in proposed YESP which is addressed more specifically below. However, the TDSB is of the opinion that the policies do not go far enough to adequately address the critical shortage of capacity in local elementary schools to accommodate an increased enrolment of students within the YESP Area and the additional enrollment pressures projected from the rapid growth associated with unexpected ongoing residential development applications.

The TDSB therefore respectfully requests that the Planning and Growth Management Committee adopt the following additional recommendation:

- *City Council direct the Chief Planner and the Executive Director, City Planning, in consultation with other divisions and the with the TDSB, to consider and where deemed appropriate by the Chief Planner, incorporate the comments and proposed policy amendments as set out tin Scheduled A attached to the letter from the TDSB, with the objective of advancing planning for school facilities facing growth-driven enrollment pressures in the YESP Area.*

BACKGROUND

Elementary schools in the YESP Area are already at or over capacity and will be challenged to accommodate the projected future population growth. As this community continues to grow and intensify, demands on local school infrastructure increase along with it. Despite having engaged in multiple processes to balance enrolment and efficiently use existing space, it will be extremely challenging for the Board to accommodate future growth in the area.

Mid and long-term population forecasts developed for the YESP Area exercise have been analyzed by Planning staff from the TDSB. This analysis suggests that the YESP area will be in a deficit of approximately 800 elementary pupil places over the long-term. The TDSB's existing land and/or buildings are not able to provide the capacity necessary to accommodate this growth; therefore a new elementary school is required.

The Midtown Community Services and Facilities Strategy (May 2018) characterizes current and future TDSB needs as follows:

- Most local elementary schools in the area are at or over capacity, as of 2018. This growth is anticipated to continue through 2026 and beyond;

- As a result of the estimated rate of population growth and the limitations of existing school sites and buildings, a new TDSB elementary school is required within the Midtown area;

- More innovative school models will be required given Midtown's mature urban environment. This may include satellite school facilities, shared/multi-use facilities and identifying new and creative funding and design solutions to support required school facilities.

The TDSB places great priority on ensuring that future growth and community service facilities (schools) are coordinated in a comprehensive manner. The TDSB is supportive of the numerous policies within the YESP that recognize this need as a priority and a requirement of future development. In particular:

- the final paragraph of Section 1.1.1;
- Section 2.2.2 as proposed to be amended in this letter;
- Section 3.3.7; and,
- the community services and facilities policies of Section 6 most notably, Sections 6.2, 6.5, 6.8, and 6.10.

In addition, the TDSB is very happy with the collaborative efforts of both TDSB and City staff to develop the proposed language of Section 9.5.1(c) which provides the policy

context within which a holding provision may be used to ensure that the provision of community service facilities (schools) keeps pace with future development:

> *"A holding provision may be placed on lands where the ultimate desired use of the lands is specified but development cannot take place until conditions set out in this Plan are satisfied. Conditions to be met prior to the removal of the holding provision may include:*
>
> *c. the provision of community service facilities and public parks"*

The key objectives of the TDSB in providing comments on the YESP are to recognize within the City's Council endorsed policy regime:

- the role of schools in contributing to a complete community within neighbourhoods;
- the need for a comprehensive approach to managing the impact of numerous development applications for intensification within an area;
- the timely accommodation of increased student enrollments in conjunction with infill growth and intensification; and
- the explicit integration of school accommodation needs not only within the in-force policy documents but also through the corresponding development approval process.

Also the TDSB proposed policy recommendations conform to and are consistent with the:

- Provincial Policy Statement (2014);
- Growth Plan for the Greater Golden Horseshoe (2017);
- City of Toronto Official Plan policy direction for community service facilities.

PROPOSED AMENDMENTS AS SET OUT IN SCHEDULE "A" EXPLAINED:

SECTION 2

The TDSB has recommended amendments to **Sections 2.1.1. and 2.2.2** in order to provide clarity that an educational facility is a "community service facility" and this approach is consistent with the policies of the approved TOCore Secondary Plan.

Also, the TDSB has proposed a new policy **Section 2.1.2** which establishes the requirement for development applications to address local school accommodation needs and this policy is intended to be complimentary to and work in conjunction with Sections 2.2.2 and 9.5.1(c).

SECTION 5

The TDSB has proposed addition wording to Policy 5.3.46 to provide added clarity regarding the distance measured between the tower portion of a tall building and the closest lot line of a neighbouring school property.

SECTION 6

The TDSB has proposed amendments to Section 6.2 for added clarity.

The TDSB has proposed a new policy as Section 6.3 to provide clarity that there is flexibility in the siting of an educational facility within a future development and not simply as a stand-alone site.

Another new policy has been proposed by TDSB as Section 6.12 which is intended to reinforce the collaborative approach already incorporated into many of the YESP proposed policies as well as supporting and encouraging a comprehensive approach to community planning.

MAPPING

The TDSB was not provided an opportunity to review and provide comments on the various Maps that are proposed as part of the YESP. In particular, the TDSB requests that on:

- **Map 21-9** – *removal of conceptual midblock connections identified as travelling through or in close proximity to Northern Secondary School, Hodgson Middle School and Davisville Junior Public School AND the removal of the new public street adjacent to the John Fisher Junior Public School property*

  This Map identifies and proposes a number of conceptual mid-block connections through several TDSB properties: Northern Secondary School, Hodgson Middle School and Davisville Junior Public School. The Board recognizes that these conceptual mid-block connections would be explored as part of any future development application, however, they should not in any way prevent the Board from expanding or rebuilding these schools, negatively impact the operation of these schools, or compromise the safety of students.

  Further, the proposed new public street identified adjacent to the John Fisher Junior Public School site is highly concerning and is not appropriate as this area is currently occupied by the school's playfield.

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- **Map 21-10** - *removal of Hodgson Middle School and Northern Secondary School as 'Properties with Potential Cultural Heritage Value'.*

  The identification of two TDSB sites, Hodgson Middle School and Northern Secondary School on Map 21-10 as 'Properties with Potential Cultural Heritage Value', was not discussed with any staff member at the TDSB and therefore we have not had an opportunity to consider all the implications such identification would have.

The TDSB looks forward to continuing its work with the City through the implementation of the Yonge-Eglinton Secondary Plan and any subsequent planning initiatives.

Thank you in advance for your consideration. If you have any specific questions or concerns, please feel free to contact Daniel Castaldo, Senior Manager, Planning, Strategy and Planning at (416) 338-4471 or at daniel.castaldo@tdsb.on.ca.

Kind Regards,

Steve Shaw
Executive Officer
Facility Services, Sustainability and Planning

SCHEDULE A

Submissions of the Toronto District School Board
YONGE-EGLINTON SECONDARY PLAN (YESP or OPA 405)

Section 2

2.1.1 Not all areas within the Secondary Plan area will experience the same levels of intensification. The intensity of development, building types, heights and land uses are set out in this Plan to ensure that:

c) development does not exceed the capacity of ***physical*** infrastructure, ***green infrastructure or community service facilities;*** and

Introduce a new Section 2.1.2 and renumber subsequent policies accordingly:

2.1.2 Public elementary educational facilities in the Yonge-Eglinton Secondary Plan Area are currently significantly over capacity. All development applications will be required to demonstrate, in conjunction with the School Boards, how new educational facilities can be provided to meet existing and new demand for student accommodation.

2.2.2 Development will not be permitted to outpace the provision of infrastructure ***and community service facilities,*** and will not proceed until such a time as the necessary infrastructure ***and community service facilities*** to support development is provided.

Section 5

5.3.46 A minimum 12.5 metre separation distance will be required between the tower portion of a tall building and ***the closest lot line of a neighbouring*** school property.

Section 6

6.2 Community service facilities will be provided in a timely manner to:
i) support and be commensurate with growth; and
ii) so as not to place additional burdens on existing community service facilities in the area where capacity may not exist.

Introduce a new Section 6.3 and renumber subsequent policies accordingly:

6.3 Community service facilities may be permitted to be integrated with private developments; such community service facilities may be located in standalone buildings or be incorporated within new and/or existing buildings.

6.8 Development that is phased should include required on-site ***community service*** facilities as part of the first phase of development.

Introduce a new Section 6.12 and renumber subsequent policies accordingly:

6.12 ***The City will coordinate the requirements of school boards and community service facilities to identify possible locations for schools and community facilities in the context of a comprehensive understanding of long term needs.***

Mapping

- Map 21-9 – ***removal of conceptual midblock connections identified as travelling through or in close proximity to Northern Secondary School, Hodgson Middle School and Davisville Junior Public School***

- Map 21-9 – ***removal of the proposed new public road adjacent to the John Fisher Junior Public School***

- Map 21-10 - ***removal of Hodgson Middle School and Northern Secondary School as 'Properties with Potential Cultural Heritage Value'.***