



11 November 2015

VIA EMAIL: pgmc@toronto.ca

Planning and Growth Management
Toronto City Hall
100 Queen Street West, 10th Floor West
Toronto, ON M5H 2N2

Attention: **Ms. Nancy Martins**
Administrator

Dear Ms. Martins,

RE: Proposed Official Plan Amendment
Pertaining to Healthy Neighbourhoods, Neighbourhoods
and Apartment Neighbourhoods Policies
Planning and Growth Management Committee
City of Toronto, Special Public Meeting
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Our File No. 15.528

Walker Nott Dragicevic Associates Limited has been retained by the Toronto District School Board ('TDSB') to provide planning consulting services regarding the proposed amendments City of Toronto Official Plan ('the Plan'). We have reviewed the proposed amendment to the Plan, which is intended to clarify and strengthen the *Healthy Neighbourhoods*, *Apartment Neighbourhoods* and *Neighbourhood* policies within the Plan. The objective of the Plan is to support the goals to enhance existing neighbourhoods and to encourage small scale retail, institutional uses and community facilities at grade in apartment buildings, in order to better serve the area residents to allow for a more walkable community.

The TDSB owns and operates over 600 school properties in the City of Toronto ('the City'), many of which are located in *Neighbourhoods* and *Apartment Neighbourhoods* designations in the Plan. As such, the TDSB has a significant interest in the policies which potentially impact TDSB sites, either by amendments to the policies which would apply to lands adjacent to schools or to the school properties themselves.

The TDSB is a major provider of educational facilities and programming in the City. The TDSB, while continuing to provide these needed services, is also interested and in need of policies which recognize that schools (sites and buildings) will be challenged to continue to operate schools and educational programs and, as appropriate, provide for a broader range of services (both publicly and privately operated) to the public while maintaining the physical stock of TDSB schools and sites where enrolments dictate continuance of schools.

In reviewing the proposed amendments to the Plan, we have observed that there is no material change to the land use permissions within the *Neighbourhoods* and *Apartment Neighbourhoods* designations. However, we have noted that there are proposed amendments to the Plan that seeks to modify the policies in Section 3 of the Plan, the policies which guide development in a number of land use designations in the Plan including the *Neighbourhoods* and *Apartment Neighbourhoods*.

City of Toronto Official Plan Section 3.2.2

The TDSB is particularly interested in the policies of Section 3.2.2 of the Plan, which deals with *Community Facilities and Services*, of which schools are an important part. The important role of schools is acknowledged in the current Plan, which dates back to 2002.

In our reading of the policy review and proposed amendment in the latest staff report, there is no discussion or reference to any amendment to Section 3.2.2. In our view, this is a section of the Plan which should have been reviewed in the context of the *Neighbourhoods* and *Apartment Neighbourhoods* review. The TDSB would encourage the City to bring forward a dialogue in respect to this section, which may perhaps result in a further amendment(s) to the proposed policy changes to introduce some flexibility for the use of schools and school properties. In our view, this approach would foster and encourage the important dialogue recognizing that schools can be promoted to provide a wider array of activities (such as the Provincial initiatives of community hubs) to meet the changing needs and demands of Toronto's communities.

There is a changing context for schools and school sites in the City, and the policies of the Plan should be reflective of the emerging and diversified needs of the communities and TDSB, which should be addressed through modifications to Section 3.2.2, *Community Services and Facilities*, of the Plan, as it would apply to the land use designations: *Healthy Neighbourhoods*, *Neighbourhoods* and *Apartment Neighbourhoods* sections of the Plan.

There is an ongoing discussion regarding community hubs (*Community Hubs in Ontario: A Strategic Framework & Action Plan*, as written to Premier Wynne by special advisor Ms. Karen Pitre) to allow for flexibility and a wider range of alternative public and private uses on school sites. The proposed amendment to the Plan does not incorporate or embrace this contemporary and long overdue initiative. In our opinion, there should be stronger emphasis in the Plan to provide for the accommodation of the shared use of school properties including the opportunity for public and private joint venture functions, which can provide both benefit to the school board and the general public.

While there is very little mention of school sites within the proposed amendments, the TDSB would like to bring forward to the City a need to review the existing language and include modifications that address the need for shared use of space of community assets within the *Healthy Neighbourhoods*, *Apartment Neighbourhoods* and *Neighbourhood* designations the Plan. A dialogue with the TDSB regarding the policies for schools and for the alternative uses of schools and school sites within the *Healthy Neighbourhoods*, *Neighbourhoods* and *Apartment Neighbourhoods* should be pursued prior to adoption of this amendment.

The TDSB would welcome the opportunity to have this dialogue and would ask that City staff be requested to meet with the TDSB and determine if further amendments to the Plan are appropriate at this time and as part of this review process. From a land use planning perspective, we believe that this would offer a

broad public benefit and allow for the use of school properties in an efficient and compatible manner with surrounding land uses.

We respectfully request notification of any of decision related to this matter and notice of any meeting of any further meetings of Planning and Growth Management Committee or Council when this matter will be considered.

We look forward to an opportunity to meet with staff to address the matters raised in this submission.

Yours very truly,

WND associates
planning + urban design

A handwritten signature in black ink, reading "Robert A. Dragicevic". The signature is fluid and cursive, with a large, sweeping initial "R".

Robert A. Dragicevic, MCIP, RPP
Senior Principal

cc. J. Colin Grant, Special Counsel, Toronto District School Board
J. Latto, Senior Manager, Toronto District School Board