

June 5, 2018

VIA EMAIL ONLY: etcc@toronto.ca

Chair and Members of Etobicoke York Community Council
Etobicoke Civic Centre
399 The West Mall
Toronto, ON M9C 2Y2
Attention: Rosemary MacKenzie

Dear Sirs:

**Re: TDSB Comments and Request to Adopt Recommendation
City of Toronto Official Plan Amendment 419 (OPA 419)
High Park Apartment Neighbourhood Site and Area Specific Policy No. 551
EYCC, Item EY31.4, June 6, 2018**

The Toronto District School Board (TDSB) has reviewed and considered the Report and Recommendations contained therein from the Director, Community Planning, Etobicoke York District. While the TDSB generally supports these Recommendations, the TDSB is of the opinion that the proposed policies and recommendations do not adequately provide for the critical shortage of the elementary student accommodation space in the High Park area and the additional enrollment pressures projected from the rapid, unexpected residential intensification.

The TDSB therefore respectfully requests that that the Etobicoke York Community adopt the following additional recommendation:

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

BACKGROUND

The TDSB was pleased to participate in the City's area based character study to assess the physical character of the area and develop a policy framework to guide future change and

compatible infill development. Official Plan Amendment 419 (“OPA419”) and Site and Area Specific Policy 551 (“SASP551”) are the culmination of that work.

Prior to and during the course of this study the TDSB has identified and advised staff that there is a critical shortage of capacity in local elementary schools to accommodate an increase in enrollment of students within the High Park Apartment Neighbourhood Area. Schools in the area will be challenged to accommodate the population growth associated with the proposed intensification.

The capacity restrictions faced by the TDSB within the High Park Apartment Neighbourhood Area are not unique to this area, and are occurring elsewhere in the City where enrollment pressures in areas targeted for increased intensification are posing a challenge to accommodating future growth. Council has recognized this challenge. As recently as May 22, 2018, Council adopted a motion recommending that the City work with the TDSB to ensure that planning for growth is linked to the timely provision of school facilities.

“City Council direct the Chief Planner and Executive Director City Planning, in consultation with other division including Parks, Forestry and Recreation, Social Development, Finance and Administration and Real Estate Services, to support the Toronto District School Board and the Toronto Catholic District School Board in advancing planning for school facilities facing growth-driven enrollment pressures in areas targeted for growth.” (Council, May 22, 2018)

The TDSB respectfully requests that the following proposed site specific policies for the High Park Apartment Neighbourhood as contained in OPA 419 and SASP 551 be included in order to assist in the planning for school facilities in the area. In general terms, these comments are premised on:

- recognizing 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 into the in-force policy documents and corresponding approval process.

The four premises above are, in the TDSB’s view, consistent with and seek to advance the Council resolution of May 22. These principles should be translated into official plan policy in areas of high intensification and growth pressure.

Recently, the City adopted OPA 405 and the Yonge-Eglinton Secondary Plan following the Midtown in Focus process, and incorporated into that secondary plan very robust policy

support for complete communities including community service facilities, the appropriate integration of development timing / phasing and provision of community service facilities, and the use of holding provisions to ensure that adequate infrastructure and community service facilities are provided before development can occur.

The TDSB strongly urges the City to adopt similar policy provisions in SASP 551 given the significant accommodation pressures already present in the High Park Apartment Neighbourhood Area, which will be exacerbated by the anticipated intensification. It is critical that new development occur only when adequate community service facilities (including schools) and other infrastructure elements are provided.

The TDSB's detailed requests for policy revisions to OPA 419 and SASP 551 are appended as a Schedule A. Many of the policy amendments requested mirror policy language recently adopted by the City in the Yonge-Eglinton Secondary Plan. Such policy recommendations 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;
- Policy approaches undertaken in other recent planning exercises – specifically the proposed Yonge-Eglinton Secondary Plan and the now Council adopted TOCore Downtown OPA; and,
- Council directive noted above.

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

Kind Regards,



Steve Shaw
Executive Officer

Enclosure: Schedule "A"

SCHEDULE A
Submissions of the Toronto District School Board
OPA 419 (HIGH PARK) and SASP 551

1. Goals - Add as new Section 1 a) and 1 i) as follows:

- a) The High Park Apartment Neighbourhood Area will continue to be an inclusive and liveable community. There will be a complete range of community services, housing options, building types, public spaces, parks and natural areas.*
- ~~a~~ *b) Support and enhance the natural environment, including the natural heritage and hydrologic features and functions in High Park, and foster sustainability within and adjacent to the High Park Apartment Neighbourhood.*
- ~~b~~ *c) Provide a high quality, green, well-connected, safe, healthy and comfortable public realm, which prioritizes pedestrians, cyclists and public transit use and supports people of all ages and abilities.*
- ~~c~~ *d) Preserve and enhance the park-like setting, generous open space amenity and soft landscaped areas that contribute to the character of the High Park Apartment Neighbourhood.*
- ~~d~~ *e) Respect the existing physical character and enhance the quality of buildings and open space within and adjacent to the High Park Apartment Neighbourhood, and protect Neighbourhoods from negative impact.*
- ~~e~~ *f) Provide consolidated, integrated and functional site servicing that minimizes impacts and improves the safety, public health and attractiveness of the public realm, the site and neighbouring properties.*
- ~~f~~ *g) Further integrate land use and transportation within the High Park Apartment Neighbourhood.*
- ~~g~~ *h) Accommodate and integrate community services and facilities within the High Park Apartment Neighbourhood.*
- i) Provide community service facilities in a timely manner to support and be commensurate with growth.*

8. Community Services and Facilities - Add new Sections 8 a) to 8 f) as follows:

To accommodate and integrate community services and facilities within the High Park Apartment Neighbourhood, it is the policy of City Council that:

- a) Community Services and Facilities will be required to support future development in the area shown on Map XX and will be provided within this area or in the immediately surrounding community.*
- b) Community Services and Facilities will be delivered in a timely manner so as not to place additional burdens on existing community services and facilities in the area where capacity may not exist. Community facilities may be permitted to be integrated with private developments.*

- c) *Community service and facility priorities for the area include public schools, child-care centres and multi-purpose community space.*
- d) *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.*
- e) *The redevelopment of any school properties and the introduction of additional uses will be determined through a comprehensive study of the site and/or area. The objective for these sites will be to ensure the sites continue to act as civic hubs of community.*
- f) *Public elementary educational facilities in the High Park 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 pupil accommodation.*
- g) Schools and community service facilities may be located in standalone buildings or be incorporated into new and/or existing buildings.
- h) To address requirements and promote cost-effectiveness and coordination, community services and facilities will be encouraged to:
 - i) Support the creation of community hubs;
 - ii) Explore satellite and alternative delivery models;
 - iii) Co-locate facilities and share resources; and
 - iv) Integrate and coordinate programs.
- i) New community service facilities and expansions or retrofits of existing community service facilities will be designed to meet the requirements of the City, public agencies, boards and commissions and will:
 - i) Be located in highly visible locations with strong pedestrian, cycling and transit connections for convenient access;
 - ii) Consider co-location within new and/or existing buildings; and
 - iii) Provide for flexible, accessible, multiple purpose spaces that can be programmed in different ways and be adapted over time to meet the varied needs of different user groups.
- j) Partnerships between landowners and public agencies, boards and commissions to support the improvement, provision and expansion of community service facilities will be encouraged.
- k) Opportunities for shared outdoor recreational space between school boards and other community groups is encouraged.
- l) Development/redevelopment is encouraged to provide community space that is eligible for the City's Community Space Tenancy Policy.

Add a new 'Section 9 – Phasing' and renumber subsequent Sections of the OPA accordingly

9. Phasing

In order to provide for the timely provision of infrastructure and community service facilities to align with future development, it is the policy of Council that:

- a) *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.*
- b) *Intensification will require investment in infrastructure and community service facilities to support growth.*
Infrastructure includes physical infrastructure such as water, sewage and stormwater management systems; thermal energy networks; electrical and communications systems; waste management systems; streets, transit and other mobility corridors, including pedestrian and cycling facilities.
Community service facilities include buildings and public spaces that accommodate a range of non-profit programs and services provided or subsidized by the City or other public agencies to support people in meeting their social needs and enhance their well-being, health and quality of life. Community service facilities include recreation, community centres, libraries, child care, schools, and spaces for the provision of public health services, human services, cultural services and employment services.
- c) *Residential development will be phased to ensure the adequate provision and distribution of educational facilities, as an integral element of the local community. The determination of the long term need for educational facilities will be based on a comprehensive understanding of the potential for redevelopment through intensification and infilling in the High Park area. A holding by-law may be used to ensure that satisfactory arrangements regarding the adequate local provision and distribution of educational facilities have been made.*
- d) *Development may be required to contribute to the delivery of community service facilities through:*
 - i. *new, expanded or retrofitted space for one or more community facility on-site, and particularly priority facilities such as, but not limited to, child care centres, multi-purpose community space, and/or public schools or satellite public schools;*
 - ii. *new, expanded or retrofitted community service facilities off-site within an appropriate distance; and/or*
 - iii. *a contribution towards the delivery of a specific community service facility that meets identified needs.*
- e) *Development that is phased should include required on-site community service facilities as part of the first phase of development.*

- f) Development may be required to accommodate temporary community service facilities until such time as the permanent community service facilities are constructed and outfitted.*
- g) 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:*
 - i. the provision of adequate street and transit infrastructure, such as, but not limited to, a dedicated express bus route, dedicated cycling infrastructure to the Downtown and/or other dedicated cycling infrastructure within the Secondary Plan area;*
 - ii. the provision of adequate municipal servicing infrastructure;*
 - iii. the provision of community service facilities and public parks;*
 - iv. measures to protect heritage buildings, properties with archaeological potential and archaeological sites;*
 - v. the construction of any required non-residential gross floor area transferred to a receiving site;*
 - vi. entering into any agreements under the Planning Act to secure equitable sharing of associated costs for any of the required matters, to front-end any required infrastructure or to secure the replacement of existing office or community service facility space; and*
 - vii. phasing of development.*