

July 4, 2022

Nancy Martins
Planning & Housing Committee Secretariat
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Chair Bailao and Members of the Planning and Housing Committee:

Re: Planning and Housing Committee, July 5th, 2022
Agenda Item PH35.15, Our Plan Toronto: Recommended Official Plan Amendment for City-wide
Employment Policies and Conversion Requests - Final Report

Toronto Lands Corporation (TLC) acts on behalf of the Toronto District School Board (TDSB) in all land use planning, real estate and leasing matters. As part of our work relating to the City's Official Plan Review, TLC sought to engage with City Planning Staff in their review of employment land conversion requests, specifically in relation to the ability of local schools to accommodate conversions proposing new residential uses, as required by Official Plan (OP) Policy 2.2.3.17 f).

TLC noted the City's preliminary assessments highlighted potential school accommodation issues for several sites being recommended for conversion. Having undertaken our own assessments of the sites, TLC/ TDSB have identified further possible concerns relating to the capacity of local schools. As many conversion requests do not currently have associated planning applications nor information on proposed residential unit counts, it is challenging to advise on whether the OP Policy 2.2.3.17 f) can be met in each case. As the OP policy relates specifically to assessing employment land conversions, once a site is converted to permit residential use, the policy will no longer apply.

As such, to carry forward the intent of OP Policy 2.2.3.17 f) regarding sufficient local school accommodation, policy language should be included within each approved conversion Site and Area Specific Policy (SASP). TLC provided City Staff with recommended policy language, as set out within our letter dated June 23, 2022 (appended herein), as follows:

'The City will monitor development applications on the lands subject to Site and Area Specific Policy No. XX on an on-going basis, taking into consideration the availability of local school accommodation. In reviewing applications for residential use, the City shall consult with the School Boards to evaluate school accommodation needs, and consider opportunities for delivery of new school space, if required for new residents, to provide for complete communities.'

Further details and an explanation of how the policy language would benefit local school boards is set out within our letter to City Staff. Unfortunately, the language has not been included within the proposed SASPs (Attachment 1 to the Report).

TLC respectfully requests that the recommendations of Item PH35.15 be amended to include the policy language proposed by TLC within OPA 591 for each approved employment land conversion SASP where residential uses would be permitted, to support sufficient local school accommodation to achieve complete communities.

Sincerely,



Daryl Sage
CEO

Toronto Lands Corporation

- c. Gregg Lintern, Chief Planner and Executive Director, City of Toronto
Christina Heydorn, City Planning, SIPA
Jeff Cantos, City Planning, SIPA
Bianca MV Bielski, Director of Planning, TLC
Yvonne Choi, Manager, Land Use Planning, TLC
Matt Bagnall, Intermediate Planner, TLC
Dan Castaldo, Senior Manager, Planning, TDSB

June 23, 2022

Christina Heydorn
Project Manager, Strategic Initiatives, Policy & Analysis
City of Toronto Planning Division

Sent by email

Dear Christina Heydorn:

Re: Municipal Comprehensive Review - Employment Area Conversion Requests

Thank you for consulting with Toronto Lands Corporation (TLC) on the above matter. The Toronto District School Board (TDSB) received notice from the City Planning Division that final assessments and recommendations for conversion requests are targeted for Planning and Housing Committee on July 5th, 2022, and the remainder in early 2023. It is understood that those conversion requests proceeding in July 2022 are where staff have advised in their preliminary assessments that lands could be converted, stating:

"Based on staff's preliminary assessment, the lands could be converted upon the completion of the MCR and provided that the above issues and any other identified issues are resolved to the City's satisfaction."

The City's Official Plan policy 2.2.4.17 f) states:

"The City will assess requests to convert lands within Employment Areas, both cumulatively and individually, by considering whether or not:

f) In the instance of conversions for residential purposes, sufficient parks, libraries, recreation centres and schools exist or are planned within walking distance for new residents."

In several of the preliminary assessments, including where staff determined lands "could be converted", sufficient existing or planned school space within walking distance was identified as an issue. TDSB's assessment of these conversion requests also identified potential student accommodation pressures in local schools, as well as lands being outside of the 1.6 km walking distance to an elementary school, as specified within the *Education Act*. Many of the conversion requests do not have associated development applications or other publicly available information setting out proposed residential unit counts, which make it challenging for TDSB to definitively advise at this time whether policy 2.2.3.17 f) can be met with respect to sufficiency of schools.

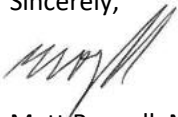
TLC understands that approved employment conversions will be subject to Site and Area Specific Policies (SASP). Where employment lands are approved for conversion to land use designations permitting residential uses, it would be appropriate to include within the resulting SASP, language which speaks to the ability of school boards to accommodate new students emanating from the former employment lands. TLC requests that the following policy language is included within all SASPs for employment area conversions where residential uses would be permitted:

'The City will monitor development applications on the lands subject to Site and Area Specific Policy No. XX on an on-going basis, taking into consideration the availability of local school accommodation. In reviewing applications for residential use, the City shall consult with the School Boards to evaluate school accommodation needs, and consider opportunities for delivery of new school space, if required for new residents, to provide for complete communities.'

The policy would, at the time development applications are being proposed, assist the TDSB in their student accommodation planning work, as well as committing to working with School Boards to secure opportunities for new school space where required for new residents. New school space may include innovative approaches such as shared use of schools, vertical integration of community infrastructure in mixed-use buildings, and/or the co-location of multiple services and facilities to create community hubs.

Should you wish to discuss TLC's proposed approach and policy language for approved employment area conversions, please contact me on my cell (see email) or at mbagnall.tlc@tdsb.on.ca. I look forward to hearing from you on this matter.

Sincerely,



Matt Bagnall, MCIP, RPP
Intermediate Planner, Land Use Planning
Toronto Lands Corporation

- c. Bianca MV Bielski, Director of Planning, TLC
Yvonne Choi, Manager, Land Use Planning, TLC
Dan Castaldo, Senior Manager, Planning, TDSB