

February 23, 2024

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

Chair and Members of Committee:

**Re: Item EY11.1 of Etobicoke York Community Council – February 26, 2024
Jane Finch Secondary Plan and Urban Design Guidelines - Final Report**

Toronto Lands Corporation (TLC) is a wholly owned subsidiary of the Toronto District School Board (TDSB), responsible for land use planning, real estate and leasing matters on behalf of the TDSB.

The TDSB owns and operates eleven elementary schools and one secondary school within the Jane Finch Community Services and Facilities (CSF) Study Area. TLC/TDSB worked with City Planning staff to prepare the Jane Finch CSF Strategy, reporting on the current status of local school accommodation and their capacity to accommodate future growth.

Two elementary schools and one secondary school in the CSF Strategy are located within the Jane Finch Draft Secondary Plan Area. We are writing to express our concerns with two policies in this Plan regarding wind/shadowing on parks (Policy 6.2.3), and the Low-Rise Neighbourhood District (Policy 4.1.i). The draft policies are reproduced below with our suggested text additions in ***bolded in red***.

Policy 6.2.3 (under Section 6.2 Parkland)

"6.2.3 Development located within proximity to existing and planned parks and open spaces will: [...]

*d) be located and designed to ensure wind conditions in parks ***and school yards*** are suitable for comfortable sitting and standing;*

*e) be located and designed to maximize sunlight on a substantial majority of the park ***and school yard*** during the spring and fall equinoxes and to minimize additional shadowing on parks ***and school yards*** to preserve their utility;"*

It is important that "school yards" are explicitly included along with parks, as precluding them from this policy could result in situations where school yards are notably impacted by wind and shadow from neighbouring developments, despite their function as community green spaces. We are particularly concerned because there have been previous Ontario Land Tribunal (OLT) cases where shadowing on school yards was rationalized because the policy only mentioned parks and did not explicitly mention school yards as a land use type where such impacts should be minimized.

Policy 4.1.i) (under Section 4.0 Area Structure)

"4.1. Map 50-2: Districts Plan, identifies nine policy areas, reflecting existing and planned context, to shape where and how development will occur: [...]

*i) The Low-Rise Neighbourhood District will undergo gentle intensification through the addition of new low-rise building types such as garden suites and multiplexes. Development will be encouraged to expand low-rise housing options, together with small-scale retail, service and office uses primarily serving area residents”, **supported by community service facilities.**”*

The TDSB anticipates the need to increase the capacity of its existing schools in the area (as noted in the CSF Strategy), which would likely involve additions to and/or rebuilding some of its schools. The requested text addition will ensure that the policies in the Low-Rise Neighbourhood District support the ability for these changes, similar to the policies referencing CSFs in the other Districts in Section 4.1. We also want to protect against a scenario in future years where the absence of reference to CSF in 4.1.i) is interpreted to suggest that additional school capacity should not go on existing TDSB sites situated within this District.

If Community Council makes the decision to adopt the Jane Finch Secondary Plan Official Plan Amendment, TLC requests that the above policy modifications be included through an item amendment.

If you have any questions, please contact me at asingh.tlc@tdsb.on.ca.

Sincerely,



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Toronto Lands Corporation

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