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**Private and Confidential**  
**Sent via E-mail**

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Planning and Housing Committee  
Toronto City Hall  
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Attention: Committee Members

**Re: Housing Action Plan: Avenue Policy Review - Decision Report**  
**Official Plan Amendment 778**  
**Comments from the Toronto Catholic District School Board**  
**Planning and Housing Committee, Item 2025.PH18.5**

We are counsel for the Toronto Catholic District School Board ("**TCDSB**"). We are writing to the Planning and Housing Committee, and indirectly to City Council as noted in the TCDSB Requests section at the end of this written submission. This written submission is with respect to proposed official plan amendments to initiate the implementation of the City's Housing Action Plan ("**HAP**") objectives pertaining to new development along *Avenues*.

### **Background**

The TCDSB has been actively tracking the progress of this matter, as the updates to the *Avenues* policies impact the TCDSB. The TCDSB currently holds fourteen (14) properties ("**TCDSB Properties**") that are located on an *Avenue* or located in close proximity to an *Avenue*. Please refer to Schedule A attached hereto for a full list of TCDSB Properties within or immediately adjacent to an *Avenue*. Given the number of TCDSB Properties impacted by the proposed amendments, the TCDSB has engaged in the development of this phase of the HAP related to the review of our City's *Avenues* and associated policies.

We understand that the current phase of the HAP includes the review and revision of Official Plan policies applicable to *Avenues* and modifications to Map 2 of the Official Plan through proposed Official Plan Amendment 778 ("**OPA 778**"). The proposed revisions to the *Avenues* policies and to Map 2 have the effect of:

- removing application requirements for *Avenue* Studies and *Avenues* Segment Reviews;
- directing more growth to higher-order transit areas;
- requiring uses that activate ground floors;

- encouraging consultation with local stakeholders to assess and mitigate the displacement of small or local businesses; and
- the introduction of new segments of *Avenues* (238 km in total).

It is our understanding that the proposed OPA 778 is to be followed shortly by corresponding land use re-designations and extension of *Mixed-Use Areas* designations, as well as the re-zoning of impacted properties along *Avenues*. The TCDSB will continue to monitor these subsequent phases of the HAP.

### **TCDSB Concerns**

The TCDSB generally supports the vision and new policy direction of the updated *Avenues* policy and acknowledges that this represents a positive and valuable change for the TCDSB and TCDSB Properties with potential increased opportunities for partnerships with local businesses, community organizations and developers.

However, the TCDSB also wishes to advise that, in its view, a number of items require further clarification. As we understand that the *Avenues* policy review and OPA 778 look to expand the *Mixed-Use Areas* within the “*Avenues*”, adding “*Avenues*” and providing as-of-right Zoning within the *Avenues*, it is uncertain, at this time, what the on-the-ground impacts will be for the various TCDSB Properties. For instance, it is unclear if the school Properties will now be within an *Avenue*, if their land use designations will change, and whether these TCDSB Properties will be subsequently rezoned.

The list of TCDSB Properties that are located within or near *Avenues* was submitted to the *Avenues* Study Group by TCDSB. The Study Group has been requested to review these properties in light of the policy and zoning updates to the *Avenues* and to address those Properties through its continuing studies and reviews. The TCDSB awaits the results of this study and inquiry. Further clarification and time are required to determine the potential impact on schools.

It is also unclear if the proposed changes provide the TCDSB with an opportunity to obtain more development potential for the TCDSB Properties along *Avenues*, should they ever exercise this option.

Furthermore, more clarity around the impact of proposed policy 2.2.3.4 and Sidebar note with respect to active uses on ground floors and the expectation that schools will form part of the ground related active uses of new developments along *Avenues* is required.

Should additional comments or concerns be identified, the TCDSB will communicate such additional comments and concerns at the earliest possible date.

### **TCDSB Requests**

We respectfully submit the above for consideration by the Planning and Housing Committee and request that the Committee forward the TCDSB’s written submission to Council for its consideration. The TCDSB also requests, through its counsel, that it be provided notice of any matter related to the HAP, particularly as it pertains to *Avenues*. The TCDSB requests notification of any modification to the draft OPA 778 text, proposed official plan amendments with respect to land use re-designations and proposed zoning by-law amendments, and to be



included in all notices or communications on this matter related to City of Toronto decisions, meetings or appeals with respect to any of the above-noted matters.

Should you have any questions or require further information with respect to the above, please do not hesitate to contact the undersigned or, in her absence, Sandra-Luna Martinez at [sluna-martinez@millerthomson.com](mailto:sluna-martinez@millerthomson.com) or 416-595-8565.

Yours truly,

MILLER THOMSON LLP

Per:



Tara L. Pjurko  
L.

c. Michael Loberto, TCDSB  
Erica Pallotta, TCDSB  
Paul Stagl, Opus Management Inc



## **Schedule A**

List of TCDSB Properties that are located within *Avenue*:

- 3672 Lakeshore Blvd W;
- 124 Northcliffe Blvd;
- 18-20 Beverly Hills Dr.;
- 160 Finch Ave W.;
- 1515 Bloor St. W.;
- 100 Brimley Rd S & 2685 Kingston Rd;
- 2665 Kingston Rd;
- 308 Tweedsmuir Ave;
- 3530 Sheppard Ave E; and
- 2216 Lawrence Ave E;

List of TCDSB Properties that are proximate to an *Avenue*:

- 760-780 Kingston Rd;
- 12 Malvern Ave;
- 230 Morningside Ave; and
- 396 Spring Garden Avenue.

