

January 22, 2025

Councillor Gord Perks, Chair
Planning & Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Chair Perks and Committee Members:

**Re: PH18.5 - Housing Action Plan: Avenues Policy Review - Decision Report (OPA 778)
Comments from Toronto Lands Corporation**

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

TLC has been monitoring and assessing the City's Avenue Policy Review initiative since early 2024 and provided comments to staff in July 2024, specifically requesting staff engagement with TLC to ensure the Review considers the impacts on student accommodation and also opportunities on TDSB sites. In late December 2024, TLC was provided notice of the public meeting and open house for OPA 778. TLC has reviewed the recommended OPA 778 and the associated Background Information, which includes a new policy framework for Avenues and mapping related to new proposed Avenues. We submit the following comments for consideration by the Planning and Housing Committee (and subsequently City Council).

Policy Change of Concern

Current OP policy 2.2.3.2 includes the following language that ensures school boards are appropriately engaged in the Avenue Studies process, to allow school boards to assess and plan for any changing school needs:

"To facilitate and shape growth, each Avenue Study will engage local residents, businesses, the TTC, Toronto Parking Authority and other local stakeholders and will set out:

- a) investments in community improvements by public agencies or public/private partnerships that are needed to support city living and make the area attractive for residents and businesses including:
 - iii. parks and open space, community and rooftop gardens and community services and facilities;" [emphasis added]

While TLC does not object to the removal of Avenue Studies, we request that the City ensures that there is continued engagement with key stakeholders to determine the adequacy of community services and facilities serving the Avenues. We note that the proposed OPA 778 language in policy 2.2.3.7.e states that "To facilitate sustainable, complete communities that are attractive to residents and businesses, Avenues will: ... be served by adequate parks, community services and facilities". This policy language is simply descriptive, with no clear direction towards or responsibility assigned to development applicants and/or the City to confirm or ensure that there is adequate community services and facilities such as schools. TLC therefore requests that policy 2.2.3.7.e

be modified to add the language “supported through the City’s direct engagement with key stakeholders in order to meet the increased needs resulting from development along Avenues” so that subsection e of policy 2.2.3.7 reads as follows:

“e. be served by adequate parks, community services and facilities, and water and sewer infrastructure, ***supported through the City’s direct engagement with key stakeholders in order to meet the increased needs resulting from development along Avenues.***”

TDSB Sites Potentially Affected by OPA 778

As set out in Appendix A, TDSB owns 79 sites across the City along existing and proposed Avenues, as well as 44 sites that are adjacent to existing and proposed Avenues, that may be potentially affected by OPA 778.

As the City moves forward with the necessary redesignation and rezoning work to implement the new Avenues vision and policies, we request that the City consult directly with TLC on these sites in advance of bringing forward any recommendations to Committee and Council. Through collaboration with TLC on the Avenues Policy Review, the City has the potential to ensure the results of the study support mutually beneficial outcomes in the future. Specifically, increased flexibility in how TDSB sites along current and new Avenues can be used would not only support the TDSB’s ability to address local student accommodation needs but may also provide opportunities in the future for TDSB to support additional residential growth and other City-building community partnerships on large TDSB sites along Avenues.

TDSB Sites Previously Identified on Proposed New Avenues

During the City’s virtual community consultations over the summer of 2024, a map was shared highlighting proposed new Avenues. In reviewing the maps of the PH18.5 Staff Report in Attachments 5 (*Map - Urban Structure with Proposed New Avenues*) and 6 (*Ward Maps - Urban Structure with Proposed New Avenues*), TLC has identified several TDSB properties that are no longer proposed to be included on a new Avenue. Two of these TDSB properties are along major streets, previously proposed as new Avenues in the summer 2024 draft mapping, that TLC believe are still appropriate to be new Avenues and should be reconsidered:

- segment along Bloor Street West (from City boundary to Etobicoke Centre area)
Bloorlea Middle School – 4050 Bloor Street West
 - The adjacency to mid-rise density and proposed high-rise density in Mixed Use Areas around The East Mall and The West Mall make this site and the adjacent area a candidate for inclusion as an Avenue.
- segment along Lawrence Avenue West (from Caledonia Road to Dufferin Street)
Joyce Public School – 26 Joyce Parkway
 - The site is part of a Mixed Use Area, with Apartment Neighbourhoods to the east, which makes this area suitable for the height and scale of mid-rise buildings, as is the vision for new Avenues through this Policy Review.

There may be other areas of Toronto that may be suitable to be recognized as new Avenues; TLC would welcome the opportunity to discuss these with City staff.

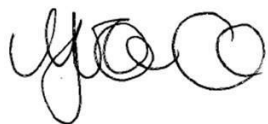
Continued Engagement with TLC

Given the City's work to expand housing options throughout Toronto, TLC understands the City's need to find new and creative ways to bring more housing online rapidly. Similarly, TDSB needs the ability to respond quickly to changing school needs at the local and system level.

TLC requests that the City engage us not only as service providers, but as landowners with opportunities to address changing school needs and Provincial priorities. As one of the largest landowners in the City, with over 600 properties distributed throughout Toronto, the TDSB has the potential to be significantly impacted by the outcomes of this Review. TLC looks forward to ongoing engagement with City staff on matters related to this file, both to protect TDSB's interests as well as to contribute to the thoughtful creation of complete communities in Toronto.

TLC requests to be notified on all future notices related to this matter, including decisions, meetings, and appeals. Thank you for the opportunity to provide our feedback throughout this process. Please contact Senior Planner, Paul Nichols, at pnichols.tlc@tdsb.on.ca with any questions regarding TLC's comments.

Sincerely,



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APPENDIX A – TDSB Sites Potentially Impacted by OPA 778

Table 1 – TDSB Sites along Existing Avenues

TDSB School/Facility	Address
Richview CI	1738 Islington Avenue
Twentieth Street JS	3190 Lake Shore Boulevard West
Pierre Laporte MS	1270 Wilson Avenue
Downsview PS	2829 Keele Street
Northview Heights SS	550 Finch Ave W
York Memorial CI / Trethewey Admin Centre	2690 Eglinton Avenue West / 2 Trethewey Drive
West Park SS	1515 Bloor Street West
Lucy McCormick Sr School	2717 Dundas Street West
Eglinton Jr PS	223 Eglinton Avenue East
C B Parsons JHS	2999 Dufferin Street
Forest Hill CI	730 Eglinton Avenue West
Oakwood CI	991 St Clair Avenue West
Bickford Centre / West End Reception / West End Alternative School	777 Bloor Street West
Riverdale CI	1094 Gerrard Street East
Eastdale CI	701 Gerrard Street East
Kew Beach Jr PS	101 Kippendavie Avenue
O'Connor PS	1665 O'Connor Drive
Winston Churchill CI/ Centre of Excellence for Black Student Achievement	2239 Lawrence Avenue East
Bliss Carman Sr PS	10 Bellamy Road South
Birch Cliff PS	1650 Kingston Road
Birchmount Park CI	3663 Danforth Avenue
R H King Academy	3800 St Clair Avenue East
West Hill PS	299 Morningside Avenue

Table 2 - TDSB Sites Adjacent to Existing Avenues

TDSB School/Facility	Address
Martingrove CI	50 Winterton Drive
City Adult Learning Centre	1 Danforth Avenue
Blaydon PS	25 Blaydon Avenue
Parkdale CI	209 Jameson Avenue
Garden Avenue Jr PS	225 Garden Avenue
Gledhill Jr PS	2 Gledhill Avenue
Frankland CS & Community Centre	816 Logan Avenue
James S Bell JM Sports and Wellness Academy	90 Thirty First Street

Howard Jr PS	30 Marmaduke Street
Deer Park Jr & Sr PS	23 Ferndale Avenue
H J Alexander CS	30 King Street
Scarborough Village PS	15 Luella Street
John Fisher Jr PS	40 Erskine Avenue
Oasis Alternative SS (Scadding Court)	707 Dundas Street West
Maplewood HS	120 Galloway Road
Highview PS	22 Highview Avenue
Duke of Connaught Jr & Sr PS / S H Armstrong Recreation Centre	56 & 70 Woodfield Road
H A Halbert Jr PS	25 Halbert Place
Tecumseh Sr PS	720 Scarborough Golf Club Road
Davisville Jr PS / Spectrum Alt Sr School	50 Davisville Avenue
Sheppard PS / Africentric Alt School	1430 Sheppard Avenue West
Emery CI / Emery EdVance SS	3395 Weston Road
Sir Robert L Borden BTI	200 Poplar Road
Edithvale Land	7 Edithvale Drive

Table 3 – TDSB Sites Along Proposed New Avenues (OPA 778)

TDSB School/Facility	Address
Elmbank JMA	10 Pittsboro Dr
Humbergrove CI	1760 Martin Grove Rd
North Kipling JMS	2 Rowntree Rd
North Albion CI	2580 Kipling Ave
Dixon Grove JMS	315 The Westway
Mimico Adult Learning Centre	255 Royal York Rd
Lakeshore CI	350 Kipling Ave
400 Kipling Avenue (Gilbey)	400 Kipling Ave
Etobicoke School of the Arts/ Karen Kain School of the Arts	675 Royal York Rd
Kingsmill CI	721 Royal York Rd
Brookview MS	4505 Jane St
Dellcrest PS	1633 Sheppard Ave W
Bala Avenue CS	6 Bala Ave
Roselands Jr PS	990 Jane St
Dr. Rita Cox – Kina Minagok PS	100 Close Ave
Runnymede CI	569 Jane St
Keele Street PS	99 Mountview Ave
Runnymede Jr and Sr PS	357 Runnymede Rd
Davisville Jr PS / Spectrum Alt Sr School	50 Davisville Avenue
Lawrence Park CI	125 Chatsworth Dr
Armour Heights PS	148 Wilson Ave

Allenby Jr PS	391 St Clements Ave
Hillcrest CS	44 Hilton Ave
John Polanyi Collegiate Institute	640 Lawrence Ave W
The Grove CS	108 Gladstone Ave
Ossington/Old Orchard Jr PS	380 Ossington Avenue
King Edward Jr & Sr PS	112 Lippincott St
Central Technical School	725 Bathurst St
Leaside HS	200 Hanna Rd
York Mills CI	490 York Mills Rd
Marc Garneau CI	135 Overlea Blvd
Finch PS	277 Finch Ave E
Highland MS	201 Cliffwood Rd
Woodbine MS	2900 Don Mills Rd
Georges Vanier SS	3000 Don Mills Rd E
Don Valley MS	3100 Don Mills Rd
Don Mills MS	17 The Donway E
Valley Park MS	130 Overlea Blvd
Monarch Park CI	1 Hanson St
Queen Alexandra MS / SEED Alt School	181 Broadview Ave
Pape Avenue Jr PS	220 Langley Ave
Cosburn MS and Diefenbaker ES	520 Cosburn Ave and 175 Plains Rd
Wilkinson Jr PS	53 Donlands Ave
R H McGregor ES	555 Mortimer Ave
Riverdale CI	1094 Gerrard Street East
Earl Haig PS	15 Earl Haig Ave
Gordon A Brown MS	2800 St Clair Ave E
Norway Jr PS	390 Kingston Rd
Crescent Town ES	4 Massey Square
East York CI / East York Alt School	650 & 670 Cosburn Ave
Ellesmere-Statton PS	739 Ellesmere Rd
R H King Academy	3800 St Clair Ave E
Galloway Road PS	192 Galloway Rd
Woburn CI	2222 Ellesmere Rd
Woburn Jr PS	40 Dormington Dr
Cedarbrae CI	550 Markham Rd
Sir Oliver Mowat CI	5400 Lawrence Ave E
Rosedale Heights School of the Arts	711 Bloor St E

Table 4 – TDSB Sites Adjacent to Proposed New Avenues (OPA 778)

TDSB School/Facility	Address
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Bowmore Road Jr & Sr PS	80 Bowmore Rd
Norman Cook Jr PS	725 Danforth Rd
CR Marchant MS	1 Ralph St
Blantyre PS	290 Blantyre Ave
William Burgess ES	100 Torrens Ave
Parkdale Jr & Sr PS	78 Seaforth Ave
Hodgson MS	282 Davisville Ave
Beaumonde Heights JMS	70 Monterrey Dr
Parkside ES	401 Cedarvale Ave
St. Margaret's PS	235 Galloway Rd
Selwyn ES	1 Selwyn Ave
Military Trail PS	701 Military Trail
Brookbanks PS	217 Brookbanks Dr
Bridgeport Drive and Bridgend Street (Port Union)	Bridgeport Drive and Bridgend Street
Albert Campbell CI	1550 Sandhurst Cir
Fraser Mustard ELA	82 Thorncliffe Park Dr
Don Mills CI	15 The Donway E
Danforth CTI/Greenwood SS	800 Greenwood Ave
Corvette Jr PS	30 Corvette Ave
Bellmere Jr PS	470 Brimorton Dr