

October 11, 2019

Diane Silver, Senior Planner  
City Planning Division  
Community Planning  
North York District  
5100 Yonge Street, Ground Floor  
Toronto, ON M2N 5V7

Dear Ms. Silver:

**Re: Laird In Focus Planning Study – DRAFT Site and Area Specific Policies (SASP)**

In 2008, the Toronto District School Board (TDSB) established the Toronto Lands Corporation (TLC) to be its real estate agency reporting back to the TDSB through its own Board of Directors. In June 2018, the TDSB expanded TLC's mandate to include all Board-wide real estate, land use planning, asset management and leasing matters. To this end, all land use planning matters and development review is now being overseen by TLC. TLC also has the authority to undertake and complete all such actions and approvals necessary to secure the interest of the TDSB.

TLC recognizes the City's efforts in developing a planning framework that will provide direction on appropriate building heights, massing, transportation connections, arrangement of open spaces, and the community services and facilities required to support development in this area of the City. We have expressed our interest and have actively participated in the Laird in Focus Study, attending technical and public meetings, as well as providing formal comments, including the letter we sent on July 26, 2019.

The draft Site and Area Specific Policies (SASP), contemplate policies that facilitate significant population increase in this area. The City is projecting that approximately 3,700 new units will be built within the study area. As a result of current residential intensification and future population growth, the TDSB is already experiencing, and will continue to experience pupil accommodation pressures, primarily at local elementary schools. The TDSB and TLC are actively reviewing development applications and accommodation matters along the Eglinton Avenue Corridor, and are engaged in all the major planning studies in the area.

To better align residential development with the adequate provision and distribution of educational facilities, the TDSB considers strategies such as boundary changes, grade changes, program relocations/augmentation, and student redirections to mitigate enrolment pressures, factoring in pupil yields for known development applications. Although at this time, the TDSB does not anticipate requiring a new school within (and/or to serve) the Laird in Focus Study Area, it is important for the SASP to include policies to help ensure that future development proposals are phased to align with the adequate provision of school accommodation to serve the Laird in Focus Study Area.

One of the goals of the Laird in Focus Plan (June, 2018) is to ensure there is an appropriate link between the consideration of development proposals and the required investments in service infrastructure and

community facilities (i.e. schools). TLC believes in the importance of the adequate provision of infrastructure and community services to ensure a complete community is achieved. To this end, we recommend adding the following policies to the SASP, under the Community Services and Facilities Section, as follows:

***“12.8 Development will not be permitted to outpace the provision of community services and facilities, and will not proceed until the provision of and/or contribution toward necessary community services and facilities to support development.***

***12.XX Residential development will be phased to ensure the adequate provision and distribution of educational facilities, as an integral element of the local community. A holding by-law may be used to ensure that satisfactory arrangements regarding the adequate local provision and distribution of community services and facilities have been made.”***

We strongly believe the proposed policies reflect overarching planning principles and build on provincial/municipal policy direction. For example, section 2 of the *Planning Act* requires decision makers to have regard for the adequate provision and distribution of educational facilities. Also, the Provincial Policy Statement, 2014 (PPS) highlights the need that planning for public service facilities (i.e. schools) shall be coordinated and integrated with land use planning so that they are available to meet current and projected need. Further, section 3.2.8.1 of the Province’s Growth Plan 2019 requires that land use planning and planning/investment in public service facilities (defined to include schools) be coordinated. Similarly, the City’s Official Plan recognizes the importance of access to community services and facilities, such as schools. Specifically, section 3.2.2 provides that “Preserving and improving access to facilities in established neighbourhoods and providing for a full range of community services and facilities in areas experiencing major or incremental physical growth, is a responsibility to be shared by the City, public agencies and the development community”.

If you have any questions or would like to meet and further discuss our recommendation, I can be reached at (416) 394-0574 or at [acifuentes.tlc@tdsb.on.ca](mailto:acifuentes.tlc@tdsb.on.ca).

Yours truly,



Alejandro Cifuentes, MCIP, RPP  
Senior Planner  
Toronto Lands Corporation

- c. Rachel Chernos Lin, TDSB Trustee, Ward 11
- Daryl Sage, CEO, TLC
- Bianca Bielski, Senior Manager, Land Use Planning, TLC
- Yvonne Choi, Manager, Land Use Planning, TLC
- Dan Castaldo, Senior Manager, Planning, TDSB
- John Andreevski, Manager, City of Toronto