



December 15, 2022

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Provincial Land Use Plans Branch  
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**Attn: Ministry of Municipal Affairs and Housing (MMAH)**

**Re: Review of A Place to Grow and Provincial Policy Statement  
Places to Grow Act, 2005 & Provincial Policy Statement, 2020  
ERO # 019-6177  
TCDSB Comments**

The TCDSB has reviewed the proposed changes to the Provincial Policy Statement, 2020 (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (A Place to Grow) which combined provide a comprehensive, integrated, whole-of-government policy framework for land use planning matters in Ontario. With respect to the proposed changes, the TCDSB wishes to submit following comments:

The proposed modifications to the legislation in question aim to reduce duplication and introduce more housing supportive polices to increase and accelerate the housing supply through focus on growth management, housing, and economic development.

The TCDSB understands the circumstances and intentions of the proposed policy modifications and, recognizes that the following explicitly stated goal: “**ensuring that growth is supported with the appropriate amount and type of community infrastructure**” is a vital component to nurturing and maintaining healthy, vibrant, and complete communities in the province of Ontario. The TCDSB anticipates that accelerated increases to local housing supply will also increase demand for school accommodation as families, and thereby additional pupils to the board settle in these new housing areas. Funding to support school construction in these areas, integrated land use planning for community services and facilities and potential for a streamlined approval process for school projects present strategies to ensure students in growing communities are supported.

As part of the proposal the Community Infrastructure section states:

*School Capacity – coordinated policy direction that ensures publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities, including the Ministry of Education’s proposal to support the development of an urban schools’ framework for rapidly growing areas*



The TCDSB is supportive of a more coordinated policy direction which better integrates schools within the municipal planning process, especially in the many high growth communities of Toronto. There are several high-density growth areas within the City of Toronto that currently pose accommodation challenges. Timelines for approvals need to be increased to keep pace with proposed development. In addition, language within an urban schools' framework would provide a crucial template for school development in high-density urban environments.

The TCDSB agrees that school planning should be part of an integrated community planning approach. It is important to plan for adequate community services and facilities when new communities are developed, or when housing is introduced to previously commercial and industrial areas. Without this type of planning, it would be inconceivable to achieve complete communities. High density communities are also conducive to the use of active transportation for daily travel. Strategically locating school accommodation among these communities can leverage this opportunity to achieve the Growth Plan's goal of increasing the use of active transportation for school travel. If the status quo were to remain, students from these growing communities will have to be bussed to alternative sites with space thereby increasing both system-wide emissions and transportation costs.

One of the greatest challenges in accommodating student populations in high-growth urban environments is the availability of suitably sized land. An integrated municipal planning approach could assist with this challenge. Provincial policies language could also be strengthened to require municipal planning departments to collaborate with school boards in the identification of such sites.

Education Development Charges are a key tool employed by TCDSB to address growth related needs. The current rate restrictions in place create challenges in securing accommodation and/or land to build given escalating land prices in the Greater Toronto Area.

Regarding the municipal approval process, the requirement for site plan approval can increase school construction timelines by up to two years. The most recent changes to the Ontario Planning Act exempted small residential development projects from site plan approval. Construction of Ministry approved school facilities can be accelerated if school projects were also similarly exempt from site plan approvals or if municipal planning departments were mandated to expedite/prioritize the review of school projects.

The TCDSB requests notification of any modifications, community consultations, appeals or notices of decision relating to this Provincial proposal. Please direct correspondence to [development.applications@tcdsb.org](mailto:development.applications@tcdsb.org)

Should you require additional information regarding our comments, please contact Erica Pallotta at (416) 222-8282. Ext. 2793.



Regards,

A handwritten signature in cursive script that reads "Michael Loberto".

Michael Loberto  
Superintendent, Planning and Development Services  
Toronto Catholic District School Board

Cc: Erica Pallotta – Senior Coordinator, Development Services  
Barbara Leporati – Senior Coordinator, Planning Services  
Adam Brutto – Senior Manager of Planning & Admissions