

July 6, 2021

Seanna Kerr
City of Toronto Planning Division
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Seanna Kerr:

**Re: Draft Plan of Subdivision Application 16 270078 STE 30 SB
21 Don Valley Parkway, 30 Booth Avenue & 375-433 Eastern Avenue**

Toronto Lands Corporation (TLC) has had an opportunity to review the above-noted development application proposing the subdivision of the subject properties, with respect to the East Harbour mixed-use development – which includes a total of 15 buildings (heights and tenure types to be determined) and 5000 new residential units.

With respects to matters of concern to the Toronto District School Board (TDSB), subsection 51(24) of the Planning Act states:

- 51(24) In considering a draft plan of subdivision, regard shall be had...to,*
- (a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;*
 - (b) whether the proposed subdivision is premature or in the public interest;*
 - (c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;...*
 - (j) the adequacy of school sites;*

The information provided in the draft plan of subdivision application does not provide TLC with sufficient information to evaluate the adequacy of school sites. However, based on the data available, TLC does not support the advancement or approval of this application at this time.

Provincially Significant Employment Zone

The subject lands are currently designated as Employment Area. In addition, this application falls within the South of Eastern area currently identified as a Provincially Significant Employment Zone (PSEZ). We understand that in May 2021, Council confirmed its support for South of Eastern as Employment Area and Provincially Significant Employment Zone. Based on the existing designation and PSEZ classification, the current development application is premature and should only be evaluated after the completion of the City's municipal comprehensive review of employment land conversions, which include a consideration of whether sufficient schools exist or are planned within walking distance for new residents (OP policy 2.2.4.17.f).

Student Accommodation Pressures

This application is proposed in a community experiencing significant residential intensification and population growth that is presenting critical accommodation challenges at the local assigned schools. Morse Street Junior Public School, which is the local junior elementary school, is anticipated to be over capacity in the coming years. Queen Alexandra Middle School, the local senior elementary school, has been identified to accommodate redirected students from Toronto's central waterfront developments – as such Morse Street Junior Public School and Queen Alexandra Middle School will have insufficient capacity to accommodate new students.

Further, Riverdale Collegiate Institute, the local secondary school, is currently over capacity and has insufficient space to accommodate this development.

The TDSB is working to secure a minimum of two elementary schools to accommodate emerging new communities along the City's central waterfront, namely within the West Don Lands and Lower Yonge Precincts. A potential opportunity is also being pursued in the Keating Precinct. Future elementary schools within the Port Lands will also be required to accommodate students residing within those future neighbourhoods.

However, despite future elementary schools being planned along the City's central waterfront, Morse Street Junior Public School and Queen Alexandra Middle School will continue to have insufficient capacity to accommodate new students. Long-term enrolment projections and accommodation plans for these schools did not consider these subject lands for significant residential intensification due to the longstanding designation of these lands as an Employment Area.

An introduction of 5,000 new residential units into this area will severely impact the Board's ability to provide adequate accommodation for students and families who will reside within these future dwellings.

Planning Policy Objectives

Unless or until it can be demonstrated that the future students attributed to this development have access to adequate and reasonable local public school accommodation, the approval of this development application is premature and not supported by planning policies and objectives.

Provincial and City of Toronto policies recognize public service facilities, including schools, as an integral community resource to achieving complete communities. Policies address that the provision of public service facilities must be taken into account when identifying locations for future growth, addressing not only the capacity of public service facilities required to accommodate current and future needs, but also the orderly progression of development and the timely provision of public service facilities in conjunction with that growth. Below are some of the policies:

"Healthy, liveable and safe communities are sustained by:

- g. ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;" (Provincial Policy Statement 2020, Section 1.1.1)*

"Land use patterns within settlement areas shall be based on densities and a mix of land uses which:

- b. are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;" (Provincial Policy Statement 2020, Section 1.1.3.2)*

"Planning authorities shall identify appropriate locations and promote opportunities for intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs." (Provincial Policy Statement 2020, Section 1.1.3.3)

"Planning authorities shall establish and implement phasing policies to ensure:

- b. the orderly progression of development within designated growth areas and the timely provision of the infrastructure and public service facilities required to meet current and projected needs". (Provincial Policy Statement 2020, Section 1.1.3.7)*

“A coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other orders of government, agencies and boards including:

d. infrastructure, multimodal transportation systems, public service facilities and waste management systems;” (Provincial Policy Statement 2020, Section 1.2.1)

“Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:

c. directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;” (Provincial Policy Statement 2020, Section 1.4.3)

“Forecasted growth to the horizon of this Plan will be allocated based on the following:

a. the vast majority of growth will be directed to settlement areas that:

iii. can support the achievement of complete communities;

c. within settlement areas, growth will be focused in:

*iv. areas with existing or planned public service facilities;”
(Growth Plan 2019, Section 2.2.1.2)*

It is TLC’s position that the timing of this application is premature and that full regard to the adequate provision of public schools needed to support this proposal should be addressed prior to allowing the application to proceed. The associated East Harbour Transit Oriented Community application was circulated to TLC last week (file 21 172637 STE 14 OZ). TLC will be reviewing the application submission and will provide more specific comments in response to the additional details provided within that application. TLC recently provided general comments to the related agenda item at the June 28, 2021 Planning and Housing Committee meeting and looks forward to work constructively with the applicant and City staff to discuss the proposed appropriate next steps to ensure the orderly progression of development with the timing of school facilities to achieve a complete community. TLC requests to be notified on all future public notices, resubmissions, appeals and other matters and requests to be included on the Interested Parties List with respect to this application.

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

Sincerely,



Paul L. Nichols, M.A.Sc., MCIP, RPP
Intermediate Planner, Land Use Planning
Toronto Lands Corporation

- c. Jennifer Story, TDSB Trustee, Ward 15
Bianca Bielski, Senior Manager, Land Use Planning, TLC
Yvonne Choi, Manager, Land Use Planning, TLC
Dan Castaldo, Senior Manager, Planning, TDSB