

June 10, 2025

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and

The Honourable Rob Flack
Minister of Municipal Affairs and Housing
777 Bay Street, College Park, 17th Floor
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**Re: ERO number 025-0462: Proposed Regulations – Complete Application
Toronto District School Board Comments**

The Toronto District School Board (TDSB) is the largest school board in Canada and one of the largest in North America, with almost 600 schools and serving approximately 12% of all Ontario students. Toronto Lands Corporation (TLC) is a wholly owned subsidiary of the TDSB and its exclusive land use planning and real estate service provider. The TDSB supports the province's efforts to respond to the current housing crisis through streamlining land use planning approvals, and concurrently, the need to ensure there are safe, accessible, vibrant schools to keep pace with the growth of our communities. On behalf of the TDSB, we are writing to provide our feedback on the Environmental Registry of Ontario posting pertaining to the proposed regulations on complete application study/report requirements.

A. The proposed topics that cannot be required as part of a complete planning application: sun/shadow, wind, urban design, lighting

The proposal to remove sun/shadow and wind studies from complete application submissions could negatively impact many existing school sites. The TDSB has many properties within strategic growth areas (as defined in the Provincial Planning Statement) where tall buildings are contemplated. TLC and the TDSB rely on the applicant's submission of these technical studies when assessing the impact of a neighbouring development proposal on TDSB sites and students. Sun/shade and wind conditions are key factors in creating a safe and comfortable microclimate to support the utility of outdoor play space at schools and to facilitate pedestrian activity and active transportation to schools – the importance of these is reflected in City of Toronto Official Plan policies, the Provincial Planning Statement and the Planning Act. These technical studies allow for evidence-based assessments, decision-making, and mitigation measures (e.g. relocation of a school playground to a sunnier location; increased building stepbacks, canopies, and landscaping to improve wind conditions – some examples are provided in Appendix A).

Without the ability to review these studies up front, TLC and the TDSB, in our role as a commenting agency, would need to seek this information from the applicant during the

application review process (and may face resistance from applicants), which would add additional time and delay to the process.

>> The TDSB requests that sun/shadow and wind impact studies be permitted to be required studies for Zoning Bylaw Amendments and Site Plan Applications, in accordance with the City of Toronto Official Plan.

B. Topics or studies that should be identified as being permitted to be required by municipalities as part of a complete application

In the City of Toronto, a Community Services and Facilities Study may be requested for large development proposals. To prepare these studies, the applicant is required to reach out to school boards for school capacity, enrolment and utilization rates at assigned schools in the local area. This early engagement allows for TDSB to assess the ability to accommodate students from the proposed development, which may involve the use of portables to accommodate students or engage in studies to explore options for creating additional school space. Through this work, TDSB may identify the need to increase local school capacity, and potentially explore opportunities for a new school integrated within the proposed development.

A Community Services and Facilities Study is one of the tools that support early and integrated planning for schools to meet current and future needs to achieve a complete community.

>> The TDSB requests that Community Services and Facilities Studies be permitted to be required studies for Official Plan Amendments, Zoning By-law Amendments; and/or Plans of Subdivision, in accordance with the City of Toronto Official Plan.

Thank you for the opportunity to provide comments. If you have any questions regarding this matter, please contact me at ychoi.tlc@tdsb.on.ca.

Yours truly,



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Director of Planning
Toronto Lands Corporation

c. Stacey Zucker, Associate Director, Modernization and Strategic Resource Alignment, TDSB
Maia Puccetti, Executive Officer, Facility Services and Planning, TDSB
Dan Castaldo, System Planning Officer (Interim), Strategy and Planning, TDSB
Ryan Glenn, Chief Executive Officer, TLC

APPENDIX A – RECENT EXAMPLES OF USES OF SUN/SHADOW STUDIES AND WIND STUDIES TO MITIGATE IMPACT ON TDSB PROPERTIES

Development Near Islington Junior Middle School: Tower Setback Increases and Floor Plate Reductions to Minimize Shadow Impact

Through reviewing the shadow diagrams prepared for a zoning by-law amendment application proposing a 35-storey tower across the street from Islington Junior Middle School, TLC was able to clearly identify new shadow impacts on the outdoor daycare play space and school in the early morning hours. Concerns were addressed through increased tower setback and a reduction in the tower floor plate size, resulting in faster moving shadow on the school site with no shadow impacts during core school hours. TLC was able to resolve shadow-related concerns through being able to review the applicant's shadow diagrams.

Development Near Brown Junior Public School: Height Restriction to Reduce Shadow Impact

A 24-storey residential development application was proposed in the South Hill area, where, through the shadow study, the height of the tower was shown to have shadow impact on Brown Junior Public School's outdoor play space during the Spring and Fall Equinox, including at morning recess. The play space was recently renovated with new programming, including Astro turf soccer field, basketball court, play structures and Astro turf play area/outdoor classroom. Through study of the shadow impacts, TLC reached a settlement with the developer at the OLT, whereby the developer has agreed to reduce and restrict the height of the development to reduce shadow impact on key areas of the school's outdoor play space.

Development Adjacent to Davisville Junior Public School: Tower Realignment to Mitigate Impact on School

The developer resubmitted a zoning by-law amendment application to permit a mixed-use development, to include two residential towers of 30 and 45-storeys respectively, with 8-storey podium and 821 residential units. Through the review of the shadow study, TLC were able to determine that a realignment of one of the towers when compared to the original submission notably reduced shadow impact on the new outdoor play space at the adjacent Davisville Junior Public School property.

Development Near Alexander Muir/Gladstone Ave Public School: Playground Relocation to Mitigate Shadow and Wind Conditions

A proposed 18-storey mixed-use building with 175 rental units raised concerns related to shadow and wind impacts on the adjacent schoolyard at Alexander Muir/Gladstone Ave Junior and Senior Public School. The affected area, which includes a climbing structure and seating, is well-used year-round by students for play and outdoor activities. TLC held multiple meetings to review the studies, as the combined effects of wind and shadow were expected to reduce the usability and comfort of this space. As a result, discussions were initiated with the school principal and TDSB regarding the potential need to relocate the play structure.