

ERO 025-1101 - Consultation on Enhanced Development Standards – Lot Level (outside of buildings)

November 21, 2025

Thank you for the opportunity to comment on ERO 025-1101 regarding Enhanced Development Standards (Lot Level). This consultation is relevant to the Simcoe County District School Board (SCDSB) as new schools, along with expansions or redevelopment of existing schools, are subject to municipal site plan control processes. While the SCDSB strives to work collaboratively with municipalities to create complete communities and support housing growth, challenges within the site plan control process have made school construction financially and practically difficult. In particular, the imposition of enhanced development standards in some municipalities has resulted in extended approval timelines, multiple submission cycles, and increased costs. These factors directly affect project viability, funding, and the SCDSB's ability to accommodate new housing growth across Ontario.

1. Interest and Experience with Implementation of Enhanced Development Standards

The SCDSB's interest in enhanced development standards stems from the experience navigating municipal site plan approval requirements that often impose significant design, cost, and timeline implications. These requirements frequently relate to lot-level elements such as parking, landscaping, grading, stormwater management, lighting, fencing, and active transportation infrastructure.

2. Consistency of Application Across Municipalities

Enhanced development standards are not applied consistently across municipalities. While some municipalities collaborate closely with school boards and provide clear, reasonable, and education-focused site plan guidance, others apply development standards developed primarily for private commercial or residential projects, without consideration of the unique operational and safety requirements of schools.

For example:

- Parking and pick-up/drop-off design requirements can vary widely between municipalities, even for similar-sized schools. The SCDSB's new elementary school in Angus, Ontario was affected by municipal requests for various traffic movement changes on a limited sized site.
- Landscaping and tree preservation standards sometimes conflict with student safety, visibility, or required play areas. The Town of New Tecumseth requested additional landscaping and tree planting/compensation as well as removal of municipally owned trees for both an existing and new elementary school in Tottenham, Ontario.
- Lighting or fencing specifications may differ from municipality to municipality, leading to inconsistency in site security and supervision. Simcoe County municipalities have requested the SCDSB install chain link fencing, wood board privacy fencing, landscape buffering or other features across similar school sites instead of a consistent standard.

This lack of consistency increases both project costs and timelines, creating uncertainty during design and tendering, and can delay the delivery of new pupil places. It is also worth noting that the process for municipal approval and site plan control varies widely across municipalities. This includes application fees, peer-review fees, application review timelines and required studies/materials for applications.

3. Appropriate Standards Outside of Buildings and their Role in Health and Safety

Municipalities should be permitted to apply standards that:

- Support safety and accessibility, such as appropriate pedestrian circulation, barrier-free access, and emergency vehicle access.
- Maintain public health and environmental protection, including drainage, stormwater management, and erosion control.
- Preserve community character, through reasonable landscaping and lighting provisions.
- Promote better wellbeing for students by prioritizing student playfields and facility spaces over increased parking lots and traffic controls.

However, these standards must be proportionate, evidence-based, and harmonized with provincial guidelines and Ministry of Education design expectations. For schools, health and safety are primarily maintained through adherence to Ministry design standards, the Ontario Building Code, and Occupational Health and Safety regulations. Municipal development standards should complement, not duplicate or exceed, these frameworks.

4. Costs of Enhanced Development Standards

Enhanced lot-level requirements frequently increase both capital and long-term maintenance costs. These additional costs may arise from multiple submission cycles, expanded consultant scopes, required specialized studies, construction changes and long-term upkeep of municipally driven standards. Some recent examples of these costs to address enhanced development standards are:

- New Tottenham elementary school: The SCDSB incurred between \$45,000 - \$50,000 in site plan approval application fees due to Town of New Tecumseth requests for landscaping, tree removal, and other development standards.
- New Angus elementary school: The SCDSB incurred between \$50,000 - \$60,000 in project consultant costs to address Township of Essa mandated requirements related to traffic and pedestrian access.
- Existing Tottenham elementary school: The SCDSB incurred approximately \$20,000 - \$30,000 in application fees, peer review fees and consultant fees to address municipal development standards on pick up/drop off lanes, native tree plantings and recreational features on site.

Enhanced standards also add ongoing maintenance costs, funded through the SCDSB's operating budget. Because school construction funding is provided through per-pupil benchmarks, unanticipated municipal requirements must be absorbed by the school board, ultimately reducing funds available for educational facilities, student supports, and programming.

5. Additional Comments or Suggestions regarding Site Plan Control

There are many solutions the Province can implement to reduce the red tape and additional costs that new educational facilities face. Some of these initiatives include:

- Standardization: The Province should consider developing province-wide guidance or templates for site plan requirements applicable to publicly funded school projects.
- Exemptions or streamlined processes: Schools could be partially or fully exempted from municipal site plan control where provincial standards already address key safety and environmental issues and will comply with Zoning and the Ontario Building Code.
- Inter-agency coordination: Enhanced communication between the Ministry of Education, the Ministry of Municipal Affairs and Housing, and municipalities would help align local standards with educational needs.

While the SCDSB supports reasonable development standards that promote safety, accessibility, and sustainability, there is also a need to ensure that greater consistency, proportionality, and coordination are provided to ensure that these standards do not inadvertently delay or add cost to the delivery of essential public education infrastructure. If you have any questions or require any further information, please do not hesitate to contact this office.

Sincerely,



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