



May 14, 2026

The Honourable Rob Flack
Minister of Municipal Affairs and Housing
777 Bay Street, College Park, 17th Floor
Toronto, ON M7A 2J3
minister.mah@ontario.ca

**Re: TCDSB Feedback on Environmental Registry of Ontario (ERO 026-0300) – Bill 98
Overarching Legislative Reform**

The Toronto Catholic District School Board (TCDSB) has reviewed the Environmental Registry of Ontario posting related to Bill 98 – Overarching Legislative Reform. On behalf of the TCDSB, we are providing the following comments respecting the proposed legislative amendments aimed at advancing planning system reform in Ontario.

The TCDSB supports the Province of Ontario’s continued efforts to streamline development approvals and accelerate the delivery of housing and infrastructure. The TCDSB also supports initiatives that assist in advancing school infrastructure in tandem with residential growth and complete communities.

Planning Reform and School Infrastructure Delivery

Measures that improve consistency and predictability in planning approvals are important; however, school infrastructure planning must remain integrated within these processes. As development approvals accelerate, there must also be coordination of school infrastructure planning and delivery. Without this coordination, residential growth may proceed ahead of available student accommodation capacity, increasing pressure on existing schools and reliance on temporary accommodation.

Improved alignment between municipal approvals processes and Ministry of Education capital priorities and delivery timelines would better support school boards in advancing projects within provincial funding timelines and accountability frameworks.

Legislative clarity recognizing publicly funded schools and associated childcare facilities as essential community infrastructure within residential and mixed-use communities is also encouraged. Reducing unnecessary planning barriers for school projects would support more timely delivery of schools in growth areas and improve coordination between residential growth and school infrastructure delivery.

The proposed reforms represent an important opportunity to improve coordination and efficiency across the planning system. Continued alignment between planning approvals, infrastructure delivery, and provincial capital priorities will be important to ensuring school infrastructure can be delivered alongside residential growth and complete communities.



The TCDSB thanks the Ministry for considering its comments as part of Bill 98 and recognizes that achieving these objectives requires coordinated planning and approvals processes that support the timely delivery of school infrastructure in alignment with residential growth and provincial capital delivery priorities. The TCDSB would welcome the opportunity to discuss its comments further.

Sincerely,

A handwritten signature in black ink that reads "Michael Loberto". The signature is fluid and cursive.

Michael Loberto
Superintendent, Planning and Development Services

Cc: Milka Zlomislic – Superintendent, Capital Development, Asset Management & Renewal
Erica Pallotta – Head of Development, Development Services