



May 14, 2026

The Honourable Rob Flack  
Minister of Municipal Affairs and Housing  
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Toronto, ON M7A 2J3  
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**Re: TCDSB Feedback on Environmental Registry of Ontario (ERO 026-0312) – Parkland Dedication Standardization**

The Toronto Catholic District School Board (TCDSB) has reviewed the Environmental Registry of Ontario posting related to proposed changes to parkland dedication requirements (ERO 026-0312). On behalf of the TCDSB, we are providing the following comments respecting the proposed amendments aimed at standardizing parkland dedication policies across Ontario.

The TCDSB recognizes the Province’s efforts to improve consistency and flexibility in parkland dedication requirements as part of broader planning system reform. The Board also supports initiatives that assist in coordinating the delivery of schools, parkland, and other community infrastructure in areas experiencing growth and intensification.

**Parkland and Alternative School Delivery**

In higher-density urban areas, alternative school delivery models are increasingly being explored to support the integration of school infrastructure within constrained development contexts. These models often rely on close coordination between school sites and adjacent municipal parkland or open space to support outdoor programming, recreation, and student use.

In this context, access to functional, contiguous, and appropriately designed open space is important to the successful operation of alternative schools. Where parkland is fragmented, encumbered, or delivered through privately owned public spaces (POPS), there is a risk that these spaces may not provide suitable conditions for active school use.

As parkland dedication policies are standardized, it will be important to ensure that parkland intended to support school communities remains functional, accessible, and capable of supporting active recreational use. Early coordination between municipalities, school boards, and development proponents will remain important to ensuring that parkland planning supports the timely delivery and operation of schools in high-density communities.

These measures, together with the proposed changes, would support the TCDSB’s ability to deliver alternative schools in tandem with residential growth and improve coordination between school infrastructure and community open space planning.

The TCDSB thanks the Ministry for considering its comments as part of the proposed changes to parkland dedication policies and recognizes that achieving these objectives requires coordinated planning processes that support the delivery of school infrastructure and community open space



alongside complete communities. The TCDSB would welcome the opportunity to discuss its comments further.

Sincerely,

A handwritten signature in black ink that reads "Michael Loberto".

Michael Loberto  
Superintendent, Planning and Development Services

Cc: Erica Pallotta – Head of Development, Development Services