

May 9, 2024

Government of Ontario - Ministry of Municipal Affairs and Housing

Re. Proposed Provincial Planning Statement, April 2024 Draft

Thank you for the opportunity to review and comment on the Environmental Registry of Ontario (ERO) posting 019-8462 regarding proposed new and revised policies for a new Provincial Planning Statement.

The Simcoe County District School Board (SCDSB) has reviewed the revised draft Provincial Planning Statement (PPS). As the PPS defines elementary and secondary school facilities as “Public Service Facilities”, the following is a review of policies that relate to the provision of schools or the ability to provide them and any comments the SCDSB has in regard to the new PPS. Additional comments on increased residential development and how it impacts the ability of the SCDSB to provide educational facilities for residents are also included.

#	Policy Section	SCDSB Comment
1.	<p>2.4.1 3. Planning Authorities should:</p> <ul style="list-style-type: none"> a) <i>prioritize planning and investment for infrastructure and public service facilities in strategic growth areas;</i> b) <i>identify the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas;</i> c) <i>permit development and intensification in strategic growth areas to support the achievement of complete communities and a compact built form;</i> d) <i>consider a student housing strategy when planning for strategic growth areas; and</i> e) <i>support redevelopment of commercially-designated retail lands (e.g. underutilized shopping malls and plazas), to support mixed-use residential.</i> 	<p>The SCDSB supports this policy but requests that this policy be amended to include potential actions planning authorities can take to ensure public service facilities are prioritized. This could include exempting new schools from the site plan control process given the unique nature of schools compared to traditional development.</p>
2.	<p>2.8.2 3. Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:</p> <ul style="list-style-type: none"> a) <i>planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;</i> b) <i>prohibiting residential uses, commercial uses, public service facilities and other institutional uses;</i> c) <i>prohibiting retail and office uses that are not associated with the primary employment use;</i> d) <i>prohibiting other sensitive land uses that are not ancillary to uses permitted in the employment area; and</i> 	<p>The SCDSB agrees that employment areas should be protected for various employment land uses. However, the SCDSB suggests replacing “prohibiting” in Policy 2.8.2.3 b) as this officially prevents the development of schools in any of these lands. While the Board prioritizes other land types for new school projects, certain factors such as settlement area boundaries, land availability and accommodation pressures may dictate the need to consider certain employment lands for potential new school sites.</p>

	<i>e) including an appropriate transition to adjacent non employment areas to ensure land use compatibility and economic viability.</i>	
3.	<p>3.1</p> <p><i>1. Infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs. Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they:</i></p> <p><i>a) are financially viable over their life cycle, which may be demonstrated through asset management planning;</i></p> <p><i>b) leverage the capacity of development proponents, where appropriate; and</i></p> <p><i>c) are available to meet current and projected needs.</i></p>	<p>The SCDSB agrees with the intent of this policy as school facilities need to be developed for considerable community use over their lifespan. However, it should be noted that many aspects of this policy are outside of the Board's control and fall on the various Ministries of the Province. Clear communication and cooperation between Ministries can identify necessary school projects from a funding and a land approvals process.</p> <p>In addition, while the SCDSB strives to work closely with municipal partners for appropriate allocation of schools, often municipalities impose certain requirements for new school projects which can be unnecessary and add time and costs to these projects.</p>
4.	<p>3.1</p> <p><i>5. Planning authorities, in consultation with school boards, should consider and encourage innovative approaches in the design of schools and associated child care facilities, such as schools integrated in high-rise developments, in strategic growth areas, and other areas with a compact built form.</i></p>	<p>While the SCDSB again supports the intent and idea of this policy, actual implementation of these items is difficult without support from the Province. A coordinated effort between Ministries is required to achieve this vision for school development as the costs of a compact built form are significant. Additionally, the current funding model for new school development does not currently contemplate innovative solutions such as these.</p>
5.	<p>6.2</p> <p><i>1. 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, boards, and Service Managers including:</i></p> <p><i>a) managing and/or promoting growth and development that is integrated with planning for infrastructure and public service facilities, including schools and associated child care facilities;</i></p> <p><i>b) economic development strategies;</i></p> <p><i>c) managing natural heritage, water, agricultural, mineral, and cultural heritage and archaeological resources;</i></p> <p><i>d) infrastructure, multimodal transportation systems, public service facilities and waste management systems;</i></p> <p><i>e) ecosystem, shoreline, watershed, and Great Lakes related issues;</i></p>	<p>The SCDSB has worked closely with municipal partners, government agencies and the Province itself in planning for new public service facilities or renovation/replacement of aging facilities. This coordinated effort has been beneficial for the residents and communities of the County of Simcoe. However, in recent years, the SCDSB has been faced with increased challenges from both the public and private sector. Land developers have become less cooperative with the Board in providing public service facilities into their community designs and municipalities have enforced</p>

<p><i>f) natural and human-made hazards;</i> <i>g) population, housing and employment projections, based on regional market areas, as appropriate; and</i> <i>h) addressing housing needs in accordance with provincial housing policies and plans, including those that address homelessness.</i></p> <p><i>4. Planning authorities and school boards shall collaborate to facilitate early and integrated planning for schools and associated child care facilities to meet current and future needs.</i></p>	<p>unnecessary processes for the development of these facilities.</p> <p>In order to ensure the SCDSB has the ability to continue providing these important community buildings, support is required from the Province to ensure that land is being appropriately set aside and subsequent proposals are funded for the development of these important features. Additionally, mandating phasing plans with associated servicing plans should be required to ensure public service facility blocks are being delivered at key milestones of the development process.</p>
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In addition to the above noted policies, the SCDSB would like to note that the draft PPS places an emphasis on housing development, intensification of residential lands and higher density in order to meet the Province's identified target of 1.5 million homes. Section 2 of the draft PPS identifies that planning authorities shall maintain an appropriate amount of land to accommodate a minimum of 15 years residential growth. Further policies call for a mix of housing options and densities in communities to support population growth and establish "complete communities" which are defined as areas where there are jobs, diverse housing options, transportation, public service facilities and commercial services. As a result, the accommodation pressures for school boards across Ontario will increase significantly and the development of new public service facilities to match this growth will become a challenge.

To face this challenge, the SCDSB requires support from the province to expedite and fund this increasing number of school proposals. The capacity of the SCDSB to develop these facilities is limited without the coordinated support from the Ministry of Education and Ministry of Municipal Affairs and Housing. Certain actions such as site plan control exception or secondary plan design would be beneficial in expediting the development of these important facilities. With the proper support and by working closely with the Province and municipalities, the SCDSB is eager to continue providing these important community features within Simcoe County.

Should you require additional information, please do not hesitate to contact this office.

Sincerely,

Andrew Keuken, MCIP, RPP
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