



December 21, 2015

Paula Tenuta,
Vice-President, Policy & Government Relations
BILD
20 Upjohn Road, Suite 100
North York, Ontario, M3B 2V9.

Dear Ms. Tenuta:

Re: Request for BILD Support for the Amendment of EDC Legislation to Allow Additional Eligible Site Preparation/Development Costs

The TCDSB is requesting that the Ministry of Education consider and initiate changes to Section 257.53 of the *Education Act* to allow for the consideration additional Education Development Charges (EDC) eligible site preparation/development costs.

The current EDC legislation sets out maximum site sizes based on the number of pupils identified for accommodation. Large tracts of vacant land are unattainable in the City of Toronto. The consequence has been expropriation of nearby sites or negotiated agreements in order to assemble suitable school sites. An example of this is the recent expropriation by TCDSB of Bayview Avenue properties in order to provide an appropriate site for the new St. Joseph's Morrow Park Catholic Secondary School on the former Cummer LINC site. The cost of land acquisition and site preparation significantly exceeds the appraised cost per acre to acquire serviced land as identified in the Board's EDC Background Study, and forming part of the EDC charge.

A solution to lowering costs is to reduce the number of acres required by delivering some site requirements through non-traditional solutions, such as providing underground parking below the proposed school building footprint and providing roof top play space. Both examples reduce the additional land required to provide surface parking and playground space. These options are more cost effective than expanding the site, and also recognize the policy direction of the Province on intensification.

The EDC Background Study identifies six sites where the construction of underground parking as part of a new school facility is considered to be more cost effective than acquiring adjacent lands to provide surface parking. The EDC charge for these sites includes the cost of underground parking, and BILD did not appeal the by-law.

The attached brief by the economic consultants Ameresco Asset Sustainability provides an analysis of the cost differential of providing underground parking in comparison to acquiring additional lands for surface parking at both St. Margaret Catholic Elementary School (85 Carmichael Avenue) and St. Joseph's Morrow Park Catholic Secondary School. In both cases, the cost of underground parking was significantly less than site expansion. In these instances, underground parking is consistent with the Education Land Costs identified in Section 247.73 of the Act, as this feature is required to prepare the land so that a facility may be built to provide pupil accommodation.

As such, TCDSB is requesting BILD's support in approaching the Ministry of Education to clarify the types of site preparation costs, and the circumstances under which these costs could be considered eligible for inclusion in the EDC rates while taking into consideration the need for:

- Reducing the overall costs of school site development;
- Providing increased opportunities to intensify school sites in support of the Provincial Policy Statement, where appropriate;
- Supporting the Province's policy initiative for increased partnerships involving community use of schools; and
- Facilitating such non-traditional site servicing costs through an amendment to the existing EDC regulation if necessary.

We look forward to further discussing this proposal. Please contact the undersigned at (416) 222-8282 Extension 2349 if you require additional clarification on these matters.

Sincerely,



Angelo Sangiorgio

Associate Director of Planning and Facilities