



# Robin Pilkey

Chair and Trustee, Ward 7, Parkdale-High Park

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Dear Toronto MPP:

I am writing to you on behalf of the Toronto District School Board, to express our concern about TDSB's inability to access Educational Developments Charges (EDCs).

As you know, many areas of Toronto have experienced significant growth and development in the last 12 years. The City of Toronto anticipates the construction and occupancy of more than 214,000 new residential units over the next 15 years and more than 313,000 new units by mid-2041. Accommodating the many students that will live in these new developments will require a significant amount of planning and financing.

The Ministry of Finance population projections (Spring 2017) for the City of Toronto identify an increase of approximately 70,000 elementary school-age children and 47,000 secondary school-age children by mid-2041. For all school boards, including the TDSB, it is vitally important to assess and plan for long-term student accommodation on the basis of neighbourhood needs, not on a jurisdiction-wide basis. Through our planning process the TDSB has recognized that there are many emerging new neighborhoods that will require a local school and many areas of intensification in the City where existing school sites have reached capacity and additional space is required nearby.

At this time, the TDSB does not qualify for EDCs as Section 10 of Ontario Reg. 20/98 under the Education Act stipulates that a school board cannot have excess space when assessed on a district-wide basis, regardless of the school accommodation pressures faced in specific neighborhoods.

In our view, Section 10 of Ontario Reg. 20/98 does not serve the purpose of either the Education Act or the original purpose of EDC funding, which was meant for new developments to fund new school sites. Without the restrictions found in Section 10 of Ontario Reg. 20/98, the TDSB would qualify for EDCs and generate revenue of approximately \$350 million over the next 15 years. Although access to EDCs will not replace the need for a new provincial funding strategy to reduce our [Renewal Needs Backlog](#), as well as maintain and operate our schools, EDCs are a critical funding tool to help us meet growth-related student needs.

In addition to amendments to Ontario Reg. 20/98, the TDSB is requesting that the Government of Ontario expand the definition of "education land costs" to include growth-related construction costs for new buildings or additions to existing buildings.

EDCs are collected at the time a building permit is issued. Once the permit is issued, there is no ability under the legislation to collect the growth-related funding needs generated by the development for which a building permit was issued. Given the current pace of development in the City of Toronto, and the TDSB's immediate need to address capacity shortfalls in various neighbourhoods within our jurisdiction, including neighborhoods you may represent, there is a

need to ensure that the TDSB qualifies to access this important growth-related funding source as soon as possible.

Last November, Toronto City Council passed a resolution in support of the TDSB and requesting that the Government of Ontario amend Ontario Reg. 20/98 to allow the TDSB to collect EDCs to support essential school infrastructure in the City.

*I urge you to advocate for the Government of Ontario to:*

- 1. Amend the Education Development Charges Regulation - Ontario Reg. 20/98 under the Education Act to allow the TDSB to collect Education Development Charges and modify Section 7 to provide more flexibility in determining enrollment capacity.*
- 2. Expand the definition of "education land costs" in the Education Act to include construction costs for new buildings or additions to existing schools to meet growth-related demand, not just acquire an interest in land for school sites.*

Should you have any questions or wish to discuss this important issue, please do not hesitate to contact me at [robin.pilkey@tdsb.on.ca](mailto:robin.pilkey@tdsb.on.ca) and we can set up an appointment. As well, your local trustee would be happy to discuss this issue with you.

Yours truly,

A handwritten signature in black ink, appearing to read 'Robin Pilkey', with a long horizontal flourish extending to the right.

Robin Pilkey, CPA, CA  
Chair  
Toronto District School Board

c: Hon. Kathleen O. Wynne, Leader of Ontario Liberal Party  
Vic Fedeli, Leader of Progressive Conservative Party  
Andrea Horwath, Leader of New Democratic Party  
Hon. Indira Naidoo-Harris, Minister of Education