



McKEE SCHOOL ADVISORY COUNCIL

The Parents Council of McKee Public School
Website: <http://schoolweb.tdsb.on.ca/mckee/ParentCouncil.aspx>
Twitter: <https://twitter.com/mckeeppssac>

35 Church Avenue, Toronto, ON, M2N 6X6

September 6, 2017

By Email and regular post

Honorable Mitzie Hunter

Minister of Education
Government of Ontario, Queens Park
Email: mhunter.mpp.co@liberal.ola.org

Honorable David Zimmer

Minister of Aboriginal Affairs and MPP for Willowdale
Government of Ontario, Queens Park
Email: dzimmer.mpp.co@liberal.ola.org

Copy to: **Honorable Kathleen Wynne**, Premier of Ontario
Email: kwynne.mpp.co@liberal.ola.org
Councillor John Filion, Councillor for Ward 23 (Willowdale)
Email: councillor_filion@toronto.ca
Trustee Alexander Brown, TDSB Trustee for Ward 12 (Willowdale)
Email: alexander.brown@tdsb.on.ca

Dear Minister Hunter and Minister Zimmer:

Re: The Problem of the Overcrowding in our Schools in Willowdale and similar High-growth Zones | Date and Next Steps regarding Your Proposed Special Forum scheduled for the Fall in Willowdale

Following up on our final McKee SAC Council meeting in June earlier this year, we are pleased to have this occasion to write to you. In particular, the Council voted unanimously to report to you on behalf of the parents at McKee in order to cover several points, namely to:

- summarize our views regarding the problem of the overcrowding in our schools in Willowdale;
- express the continuing concerns of many parents here in Willowdale; and
- convey our appreciation that you are giving this the highest priority and are re-organizing your proposed Special Forum with the Minister of Education at

which parents can attend, discuss and confirm with you the solutions being put in place.

We also think it useful to take this opportunity to update you on any other relevant developments.

Brief Background

As you'll recall, the McKee SAC initiated and organized the **Special Forum on Overcrowding** that was held on February 22, 2017, at which MPP **David Zimmer**, Councillor **John Filion** and Trustee **Alexander Brown** all gave presentations on the possible solutions.

By all accounts, this Forum was a tremendous success. The many parents who attended were extremely pleased to see our three local representatives put forward a proposed solution that would enable the use of Education Development Charges (EDC's) in a high-growth zone such as Willowdale. The general consensus was that this would address and solve the problem of overcrowding in a way that makes complete sense: it would not just be a short-term fix but an ongoing solution to tackle the increasing pressure of overcrowding due to intense residential development.

For your convenience, we attach hereto the '**Report on the Special Forum on Overcrowding on February 22, 2017**' that was prepared by the McKee SAC (which is also available on the McKee SAC website at <http://schoolweb.tdsb.on.ca/mckee/ParentCouncil.aspx>). This Report documents the consensus discussed and reached at the Forum regarding how a small change to the current regulations could be made to enable Education Development Charges to be used in a high-growth zone like Willowdale.

We were also pleased that other Willowdale school advisory councils have now also become highly engaged in this issue and committed to participating in the search for the solutions to this problem. Willowdale schools such as Elkhorn P.S. have also published the Report on their SAC websites (see for example: https://www.elkhornschoolcouncil.ca/main/wp-content/uploads/2017/03/Overcrowding-Forum-Report_Optimized.pdf).

In the aftermath of the February 22nd Forum, we were very pleased that MPP Zimmer proposed and helped organize a Special Forum with the Minister of Education to be held on **May 10th** of this year.

In anticipation of that Forum, the McKee SAC together with Trustee Brown organized a meeting of other Willowdale SAC Co-Chairs and interested parents on **April 6th**. The feeling at this meeting was highly positive and parents greatly looked

forward to the opportunity to meet with and listen to the Minister of Education on May 10.

We were, of course, disappointed when we learned that the Special Forum scheduled for May 10th was ultimately postponed, which we understand was due to a budget caucus meeting.

It is also disappointing that this postponement effectively caused a significant delay of nearly six months before this issue is again addressed. However, we remain extremely pleased that you have made a commitment to still hold the Special Forum with the Minister of Education, which we understand is being scheduled for October 2017.

Major Concerns

We believe it is useful at this stage to note down some of the major concerns regarding the now-extensive use of portables. This will help give you a feel for the concerns being expressed by parents, and the urgency of this issue. These are in no particular order of importance:

- **Too many portables.** Parents have heard the view expressed on several occasions that portables are now being viewed as a quasi-permanent solution. Indeed, at just the five schools described in the attached Report, there are some 16 portables currently being used. Clearly a portable should be at most a very temporary solution and their use should be limited.
- **Significant further condo construction.** We have received several reports over the last few months regarding the number of new condo and other residential construction projects in the Willowdale area. The numbers are alarming, and all point to the conclusion that there will continue to be explosive growth in the number of young children requiring elementary and high school education in the Willowdale area.

In particular, we draw your attention to **Attachment 2**, which is the data from the TDSB as at March 2017 on the number and details of the active residential developments in the Ward 12/Willowdale area.

The upshot: today, there are 76 active new residential developments according to this Report.

We believe there are two important conclusions to draw from this data. First, this is a huge number of new residential projects, and as everyone now knows the high cost of a home in Toronto means that virtually all new families with

children are moving into condos or similar affordable high-rise living. This means these new residential developments will likely have a large percentage of families with young children.

Second, since these are all new residential developments, each one of these would be (or would have been) a candidate for applying the Education Development Charges and thus collecting a reasonable fee from each development that would go to financing the new school space needed in the area.

One reason most parents support the idea of the EDCs is that it is a very sound, common practice: the logical principle is that when developers build new projects in the area that increase the need for school space, it is completely logical that this new private sector development should also contribute to the financing of new school space needed for the kids.

- **Security risks for the children.** Many parents continue to complain to us about the safety of these portables, and we believe their concerns are fully justified. This is particularly so in light of these trying times where crimes sometimes today are motivated by hate or protest. One problem is that the portables simply do not have the same level of security as a classroom inside the school. Once the school day starts, an outside visitor can only enter the main school after being screened. With the portables, the opposite is true: an intruder could easily enter one of them with little difficulty. And as regards fire, the portables have only one door, and therefore would be a potential fire trap in the event of a fire.
- **An inferior education for the children.** Although most parents would like to be patient and accommodating, the reality is that the children who have to spend their year in a portable are at a disadvantage. They do not get ready access to many of the facilities in the school building, such as the library, media lab, etc. And in the winter months they face an unpleasant experience in having to trek back and forth through the snow to get to the main building.
- **The failure to properly expand school space in tandem with Willowdale's building expansion.** Parents have duly noted that Willowdale has been one of the province's targeted growth zones during the last ten years under the *Places to Grow Act*. Construction in the area has indeed been extensive and the growth spectacular. But the negative result has been the problem of overcrowding.

It follows that parents are very concerned that since the area was not able to use the Education Development Charges from developers to contribute to the cost of building new school space, there has been a significant lost opportunity. Many parents have expressed the view that this failure to grow school space in tandem with the population growth reflects a serious failure in management.

Format of the Special Forum with the Minister of Education

Once again, we are very pleased that both of you remain committed to holding the proposed Special Forum in October.

We would be very grateful if you could confirm a final date for the Special Forum at your earliest opportunity. This will help us coordinate with other parents and the other SAC's. In addition, we would be grateful if you could provide advance guidance on the proposed format of the Forum, and in particular whether you will by then be in a position to present a definitive solution to the problem.

In the event that Education Development Charges are not the solution proposed, we are particularly keen to learn what solution will be proposed and how it will solve the problem over the long-term. As you can imagine, parents with young children are thinking long-term (eg. 5 to 10 years ahead) as this is the period when their children will be attending elementary school in the area.

*

In closing, we thank you once again for hearing and addressing these concerns, and most of all for agreeing to give the problem of overcrowding in our schools the highest priority.

Sincerely yours,

Alireza Youssefi
Co-Chair, McKee SAC

Afsaneh Shahsavar
Co-Chair, McKee SAC

Attachments:

Attachment 1: Report on the Special Forum on Overcrowding in our Willowdale Schools, held on February 22, 2017

Attachment 2: Ward 12 Active Residential Developments as at March 2017: 76 Active New Residential Developments in Progress

February 2017

REPORT ON THE SPECIAL FORUM ON OVERCROWDING IN OUR WILLOWDALE SCHOOLS, HELD ON FEBRUARY 22, 2017 AT McKEE PUBLIC SCHOOL

Ontario MPP David Zimmer, Willowdale Councillor John Filion and Trustee Alexander Brown agree on how to solve a growing crisis hurting kids' education in North York



From l to r: Councillor John Filion, MPP David Zimmer and Trustee Alexander Brown

A three-way political debate on February 22, 2017 at a Special Forum led to a clear consensus on how to solve the growing crisis in Toronto's North York: insufficient classroom space for students triggered by the area's explosive growth.

REPORT PREPARED BY
McKee Student Advisory Council, Host of the Special Forum
Feb. 23, 2017

WILLOWDALE, North York / Toronto, Ontario, Feb. 23, 2017 --

At a Special Forum on February 22, 2017 organized by the McKee Public School parent council (the Student Advisory Council or SAC), the **Honourable David Zimmer** (MPP for Willowdale), North York **Councillor John Filion**, and Willowdale School **Trustee Alexander Brown** reached a strong three-way consensus on how to urgently solve a problem that has many parents increasingly up in arms.

REPORT ON THE SPECIAL FORUM ON OVERCROWDING
IN OUR WILLOWDALE SCHOOLS, HELD ON FEBRUARY 22, 2017
AT MCKEE PUBLIC SCHOOL

The problem? Developers have built new condos and houses in Willowdale at an alarming pace in the last ten years. However, the government bodies have been blocked from using what are called ‘Education Development Charges’ (or EDCs) for new school space. When available, the EDCs enable a school board to collect money from the developers to buy new land for new school sites. Under the current rules, Toronto as a whole is blocked from using this source of funding – because of the rule that says student numbers must first exceed capacity across the *whole* of Toronto. That’s not the case – as a whole. The overcrowding is in places like Willowdale, North York. And in any event the school board doesn’t need to buy new *land* in Willowdale, it needs to construct new *classrooms and buildings*.



Who’s feeling the pain? Overcrowding in Willowdale’s schools has reached chronic proportions, and a growing number of young kids spend the year in portables, not classrooms. Worse, the experts predict that the problem is only getting worse if not solved *now*.

The solution? After debating the options available, MPP David Zimmer, Councillor John Filion and Trustee Alexander Brown emerged in complete agreement on the needed solution, building on an initial idea put forward by Councillor Filion.



From l to r: Councillor John Filion, MPP David Zimmer and Trustee Alexander Brown

REPORT ON THE SPECIAL FORUM ON OVERCROWDING
IN OUR WILLOWDALE SCHOOLS, HELD ON FEBRUARY 22, 2017
AT MCKEE PUBLIC SCHOOL

The solution involves having the Ontario Government recognize a *limited exception for high growth centres* like North York Centre, which is in fact *an area targeted for growth* under the province's own legislation. That legislation, called Ontario's *Places to Grow Act*, designates about 25 such centres across Ontario, and North York Centre is one of them.

As Councillor Filion explained, North York Centre has seen explosive growth and has already reached its growth targets set for the year 2041. But the development of schools in Willowdale has not kept pace.

"I'm very attracted by this idea of recognizing the local reality," said MPP David Zimmer, adding that the solution is in realizing that "one size does not fit all."

The change to the law would be relatively simple. The minor amendment, Councillor Filion said, would consist of "1 – in growth target areas that have exceeded or achieved their growth targets, such areas are exempt from the general rule on Education Development Charges, and 2 – they [the charges] need to be for new construction, not just new land."

The amendment would mean that in the designated high growth zones like North York Centre, the school board would be able to collect charges from the developers on new development and use this money to build the needed new school classrooms and buildings.

Trustee Alexander Brown confirmed he was delighted the constructive debate had focused on this realistic solution: "I think at this table tonight, we have a consensus," he said. He then stressed that to move this forward, we need to show that how there is this mounting pressure from parents to get the solution adopted.

Many parents attending asked what the speakers would need from parents to get this adopted at Queen's Park.

REPORT ON THE SPECIAL FORUM ON OVERCROWDING
IN OUR WILLOWDALE SCHOOLS, HELD ON FEBRUARY 22, 2017
AT McKEE PUBLIC SCHOOL

All three speakers said it's essential to communicate this strong desire of the parents to see change here.

MPP David Zimmer added that "one of my responsibilities is to convey the strength of the emotion here, and I will commit here to speak to the Ministry of Education and the Premier."

Councillor Filion added that the upcoming year is a good time to get this done. He said "Kathleen Wynne does understand education. The more David (Zimmer) can speak on behalf of local residents, the more likely this will get adopted – especially as there are other MPPs who have this problem" in their districts.

About the McKee SAC The Student Advisory Council (SAC) is the provincially-mandated parent council of McKee Public School, Willowdale. It has long enjoyed a record of active participation by parents in the school as well as the local community in North York. Its current Co-Chairs are: Ali Youssefi and Afsaneh Shahsavari.

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Ward 12 Active Residential Developments as at March 2017: 76 Active New Residential Developments in Progress



**Ward 12 Active Residential Developments
March 2017**

WARD	ID #	Development Address	Status	Total # of Units	Type of Units	Pupil Yield		Estimated Occupancy Year	Designated Schools		
						Elem	Sec		Elementary	Intermediate	Secondary
12	00023	120 & 166 Sheppard Ave E/150 & 163 Maplehurst Ave	CIRC	74	R	8	6	2020/21	Avondale	Avondale	G Vanier
12	04023	4917-4975 Yonge St/Building C	COMCN	478	C	33	19	2020/21	Avondale	Avondale	G Vanier
12	11019	500 Sheppard Ave E	COMCN	310	C	22	12	2020/21	Avondale	Avondale	G Vanier
12	12017	2,4,6 & 10 Teagarden Crt	COMCN	115	C	8	5	2018/19	Avondale	Avondale	G Vanier
12	13013	49 Sheppard Ave E/14-24 Bonnington Pl	OMB	152	C	11	6	2020/21	Avondale	Avondale	G Vanier
12	13048	176-180 Sheppard Ave E	OMB	22	C	2	1	2019/20	Avondale	Avondale	G Vanier
12	13052	2 & 50 Sheppard Ave/4841-4881Yonge/2-6 Forest Lane	BL	374	C	26	15	2020/21	Avondale	Avondale	G Vanier
12	16084	179-181 Sheppard Ave E	COMCN	230	C	16	9	2020/21	Avondale	Avondale	G Vanier
12	13021	57 Linelle St	COMCN	26	TH	3	2	2020/21	Cameron	Willowdale	Northview
12	15045	53-63 Sheppard Ave W/62-68 Bogert Ave	OMB	192	C	14	8	2020/21	Cameron	Willowdale	Northview
12	15102	4800 Yonge St	CIRC	536	C	38	21	2020/21	Cameron	Willowdale	Northview
12	16060	21 & 23 Franklin Ave	CIRC	6	SF/SD	1	1	2019/20	Cameron	Willowdale	Northview
12	16133	314-317 & 325 Bogert Ave/305-308 Poyntz Ave	CIRC	1348	C/R	98	59	2020/21	Cameron	Willowdale	Northview
12	16073	245-255 Sheppard Ave W/250-258 Bogert Ave	COMCN	105	C	8	4	2020/21	Cameron	Willowdale	Northview Hts
12	16131	23-27 Poyntz Ave	CIRC	4	R	0	3	2020/21	Cameron	Willowdale	Northview Hts
12	05198	5350 Yonge St/77 Canterbury Pl	OMB	346	C	24	14	2019/20	Churchill	Willowdale	Northview
12	09029	5220-5254 Yonge St	COMCN	285	C	19	11	2019/20	Churchill	Willowdale	Northview
12	14069	36-40 Churchill Ave	OMB	18	TH	2	1	2019/20	Churchill	Willowdale	Northview
12	99012	5182-5218 Yonge St	BL	374	C	26	15	2018/19	Churchill	Willowdale	Northview
12	16101	26-36 Hounslow Ave	CIRC	34	C	2	1	2020/21	Churchill	Willowdale	Northview Hts
12	08097	57-63 Finch Ave W	COMCN	70	C	6	3	2019/20	Churchill / Yorkview	Willowdale	Northview
12	01051	151 McNicoll Ave/155 McNicoll/McNicoll PS)	BL	22	SF/SD	4	3	2017/18	Cresthaven	Highland	AY Jackson
12	00022	1001-1019 Sheppard Ave E-Block 13	OMB	712	C	59	37	2018/19	Crestview	Woodbine	G Vanier
12	00022	1015-1181 Sheppard Ave E-Block 12	CIRC	689	C	55	34	2019/20	Crestview	Woodbine	G Vanier
12	00022	1015-1181 Sheppard Ave E-Block 7/17	CIRC	270	C	22	14	2020/21	Crestview	Woodbine	G Vanier
12	00022	1015-1181 Sheppard Ave E-Block 9/18	CIRC	252	C	20	13	2020/21	Crestview	Woodbine	G Vanier
12	00022	1015-1181 Sheppard Ave E-Block 11	CIRC	419	C	34	21	2020/21	Crestview	Woodbine	G Vanier
12	00022	1015-1181 Sheppard Ave E-Block 15	CIRC	865	C	69	43	2020/21	Crestview	Woodbine	G Vanier
12	09014	5,7,9,11& 15 Kenaston Grdns/577 Sheppard Ave E	OMB	245	C	20	12	2018/19	Crestview	Woodbine	G Vanier
12	12001	2,14 Cusack Crt	BL	163	C	14	9	2018/19	Crestview	Woodbine	G Vanier
12	13010	591-593 Sheppard Ave E	COMCN	186	C	15	9	2018/19	Crestview	Woodbine	G Vanier
12	15077	15-21 Greenbriar Rd	CIRC	14	TH	3	2	2019/20	Crestview	Woodbine	G Vanier
12	15077	14-20 Greenbriar Rd	CIRC	14	TH	3	2	2019/20	Crestview	Woodbine	G Vanier
12	15081	12-16 Dervock Cres	CIRC	24	C	2	1	2019/20	Crestview	Woodbine	G Vanier
12	16019	625-627 Sheppard Ave E/6-10 Greenbriar Rd	CIRC	184	C	15	9	2019/20	Crestview	Woodbine	G Vanier
12	15056	3057-3067 Bayview Ave/1 Burleigh Hts Dr	OMB	21	TH	4	3	2019/20	Elkhorn	Bayview	G Vanier
12	15105	3049-3051 Bayview Ave/2 Blithfield Ave	OMB	11	TH	0	0	2019/20	Elkhorn	Bayview	G Vanier
12	08002	448-456 Kenneth Ave	BL	29	C	2	1	Spring 2018	Finch	Avondale	G Vanier
12	12102	238-258 Finch Ave E	BL	58	TH	11	7	Spring 2017	Finch	Avondale	G Vanier
12	12103	100-114 Finch Ave E	BL	82	C	7	4	2019/20	Finch	Avondale	G Vanier
12	16045	50 & 52 Finch Ave E	COMCN	64	C	5	3	2019/20	Finch	Avondale	G Vanier
12	16072	260-264 Finch Ave E	COMCN	28	C	2	1	2019/20	Finch	Avondale	G Vanier
12	14036	3052 Bayview Ave/351 McKee Ave	BL	7	TH	1	0	2017/18	Finch	Bayview	G Vanier
12	15024	2966 Bayview Ave/400 Hillcrest Ave	BL	6	TH	1	0	2019/20	Hollywood	Bayview	G Vanier
12	15064	2932-2942 Bayview Ave	OMB	48	C	3	2	2019/20	Hollywood	Bayview	G Vanier
12	12024	*1200-1220 Sheppard Ave E	OMB	1478	C	118	74	2020/21	Lescon	Woodbine	G Vanier
12	10080	5948&5959Yonge/1&2Doverwood/15Wedgewood/48Cun	OMB	2108	MIX	170	106	2019/20	Lillian	Cummer Valley	Newtonbrook
12	10080	5959 Yonge St-Building C/PH2	OMB	328	C	26	16	2020/21	Lillian	Cummer Valley	Newtonbrook
12	10080	5959 Yonge St-Building D/PH2	OMB	275	C	22	14	2020/21	Lillian	Cummer Valley	Newtonbrook
12	10080	5959 Yonge St-Building E/FUTURE PHASE	OMB	180	C	14	9	2021/22	Lillian	Cummer Valley	Newtonbrook
12	10080	5959 Yonge St-Building F/FUTURE PHASE	OMB	12	TH	2	1	2021/22	Lillian	Cummer Valley	Newtonbrook
12	10080	5959 Yonge St-Building G/FUTURE PHASE	OMB	374	C	30	19	2021/22	Lillian	Cummer Valley	Newtonbrook
12	10080	5959 Yonge St-Building H/FUTURE PHASE	OMB	0	0	0	0	2021/22	Lillian	Cummer Valley	Newtonbrook
12	10080	5959 Yonge St-Building A/PH1	OMB	555	C	44	28	Summer 2018	Lillian	Cummer Valley	Newtonbrook
12	10080	5959 Yonge St-Building B/PH1	OMB	384	C	31	19	Spring 2019	Lillian	Cummer Valley	Newtonbrook
12	11089	5799-5915 Yonge/Towers A & B-BLOCK 1/PH1	OMB	799	C	64	40	2020/21	Lillian	Cummer Valley	Newtonbrook
12	11089	5799-5915 Yonge/Towers C & D-BLOCK 2/PH2	OMB	737	C	59	37	2020/21	Lillian	Cummer Valley	Newtonbrook
12	11089	5799-5915 Yonge/BLOCK 3/PH3	OMB	92	C	7	5	2020/21	Lillian	Cummer Valley	Newtonbrook
12	12123	3358-3364 Bayview Ave	COMCN	16	TH	3	2	2019/20	Lillian	Cummer Valley	Newtonbrook
12	16007	3390-3398 Bayview Ave	CIRC	22	TH	4	3	2020/21	Lillian	Cummer Valley	Newtonbrook
12	16044	162-200 Cummer Ave	COMCN	14	SF/SD	3	2	2019/20	Lillian	Cummer Valley	Newtonbrook
12	14018	191 & 193 Empress Ave	OMB	8	TH	1	1	Spring 2017	McKee	Bayview	G Vanier
12	13002	50 Kenton Dr/KENTON PS SITE	BL	15	SF/SD	3	2	2017/18	RJ Lang	Fisherville	Northview
12	08042	51 Drewry Ave & 8-28 Inez Crt	OMB	540	C	41	23	2020/21	RJ Lang	RJ Lang	Newtonbrook
12	16001	5840-5870 Yonge St	OMB	518	C	36	21	2020/21	RJ Lang	RJ Lang	Newtonbrook
12	99105	43 Drewry Ave	BP	45	TH	6	3	2018/17	RJ Lang	RJ Lang	Newtonbrook
12	08014	228-232 Finch Ave W	CIRC	39	C	3	2	2019/20	RJ Lang	RJ Lang	Northview
12	12022	206 & 208 Finch Ave W	BL	8	TH	1	1	Spring 2017	RJ Lang	RJ Lang	Northview
12	13058	172-180 Finch Ave W/1-11 & 23 Grantbrooke St	OMB	182	C	13	7	2020/21	RJ Lang	RJ Lang	Northview
12	15086	11-19 Altamont Rd	OMB	32	TH	4	2	2020/21	RJ Lang	RJ Lang	Northview
12	16000	286 Finch Ave W	COMCN	25	C	2	1	2020/21	RJ Lang	RJ Lang	Northview
12	16100	240 & 242 Finch Ave W	COMCN	6	TH	1	0	2020/21	RJ Lang	RJ Lang	Northview Hts
12	14012	25 Ballyconner Crt	BL	32	SF/SD	6	4	2019/20	Steelesview	Zion Hts	AY Jackson
12	15006	3237 Bayview Ave	COMCN	153	C	12	8	2018/19	Steelesview	Zion Hts	AY Jackson
12	11064	10 Ruddington Dr	CIRC	184	TH	6	4	2020/21	Steelesview	Valley	AY Jackson
12	13038	221-231 Finch Ave W	BL	91	C	6	4	2019/20	Yorkview	Willowdale	Northview

Definition of Status:
 APPR - Application Approved
 BP - Building Permit Approved
 BL - By Law Passed
 CIRC - Application Circulating
 COMCN - Community Council / Public Meeting
 CONVR - Conversion from Rental to Condo
 OMB - Ontario Municipal Board Meeting
 REFUSE - Application Refused

Definition of Type of Units:
 C - Condominium
 T - Townhouse
 A - Assisted / Affordable
 R - Rental
 SD - Semi Detached
 SF - Single Family
 O - Other Type

Methodology for Calculating the Pupil Yield:
 The pupil yield forecasts are based upon counts of actual TDSB students residing in similar units based on unit type and tenure type.

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