

<b>TO:</b>	<b>CHAIR AND MEMBERS CORPORATE SERVICES COMMITTEE MEETING OF FEBRUARY 17, 2015</b>
	<b>GRANT HOPCROFT, DIRECTOR OF INTERGOVERNMENTAL AND COMMUNITY LIAISON</b>
<b>SUBJECT</b>	<b>SUBMISSION TO MINISTRY OF EDUCATION REVIEW OF THE PUPIL ACCOMMODATION REVIEW GUIDELINE (PARG)</b>

<b>RECOMMENDATION</b>
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That, on the recommendation of the Director of Intergovernmental and Community Liaison, the following action be taken in connection with the Ministry of Education Review of the Pupil Accommodation Review Guideline (PARG):

- a) the draft City of London response to the Ministry of Education Review of the Pupil Accommodation Review Guideline BE ENDORSED; and
- b) Civic Administration BE REQUESTED to report back at a future meeting of the Community Services Committee following release of any revisions to the PARG by the Ministry of Education.

<b>PREVIOUS REPORTS PERTINENT TO THIS MATTER</b>
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None

<b>BACKGROUND</b>
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In December 2014, the Ministry of Education proposed changes to the Pupil Accommodation Review Guideline (PARG). The PARG provides Ministry direction to school boards regarding the accommodation review process undertaken by school boards to determine the future of a school or group of schools. The current PARG has been in place since 2009, and can be found at <http://www.edu.gov.on.ca/eng/policyfunding/reviewGuide09.pdf>.

The existing Guideline requires school boards to establish accommodation review policies, and expects school boards to undertake long term enrolment and capital planning, and wherever possible focus on groups of schools rather than single schools whenever reviews occur. Reviews are led by an Accommodation Review Committee (ARC) appointed by the board. The ARCs are advisory and submit recommendations to the school board. The review process includes development of a School Information Profile (SIP) to assist the ARC and the community in evaluating how well schools meet objectives and reference criteria. ARCs are to take into account four considerations:

- Value to the student
- Value to the school board
- Value to the community
- Value to the local economy

Many municipalities and other organizations have expressed concerns over the years about school closings and the application of the PARG to the school closure process. The Community Schools Alliance (<http://www.communityschoolsalliance.ca/>), with a membership comprised of many municipal governments, has called on the province to place a moratorium on school closings until

after a full review of the PARG. AMO has also urged the province to reassess the accommodation review process.

### Proposed Changes to the PARG

The Ministry is proposing changes in six main areas:

1. Role of the ARC
  - a) Focus on being a conduit of information rather than voting on recommendations.
  - b) Providing comment on school board administration reports and options.
  - c) Providing new options for consideration of the board.
2. ARC membership
  - a) ARC members would include parent reps from school(s) under consideration and school board administration.
  - b) Broader community input would be through open public meetings or delegations.
3. Municipal Involvement
  - a) More defined role for engagement of municipalities with 2 minimum roles: technical support to school board administration for initial report and SIP; and formal invitation to municipal administration or councillors to share information on upcoming accommodation reviews.
  - b) Municipal rep on ARCs to still be at school board option.
  - c) Municipal opportunity to attend ARC and Board meetings as a delegation.
4. Timelines
  - a) Minimum process to be shortened from seven months with 4 public meetings to five months with 2 public meetings.
  - b) Decreased minimum requirement for public consultation period from 90 days to 60 days.
  - c) Decreased minimum requirement between school administration final report and Board trustee vote from 60 days to 30 days.
5. Optional Shortened Process
  - a) Optional shortened ARC process can be utilized, with: minimum process of 2½ months; no ARC required; minimum requirement of one public meeting.
  - b) Shortened process would be based on listed factors; including distance to nearest accommodation; utilization rate of facility; number of enrolled students at the school; elective programming available at the school.
6. Reports and School Information Profiles
  - a) School Board Administration initial report will be required to contain one or more options, including a recommended option.
  - b) Initial report must include information on actions taken prior to the process, with supporting rationale why such actions were not suitable.
  - c) Instead of ARC providing a recommendation to the Board, the ARC report will summarize consultation feedback, including options developed by ARC members with supporting rationale.
  - d) Instead of SIP considering value to student, school board, community and local economy, the SIP will be an orientation document with school board and school data.

A complete listing of the proposed changes to the PARG can be found at; <http://www.peopleforeducation.ca/wp-content/uploads/2014/12/Ministry-of-Education-consultation-document-on-Pupil-Accommodation-Review-Guidelines.pdf>

A Civic Administration working group comprised of Lynne Livingstone, John Fleming, Sandra Datars Bere and Grant Hopcroft was convened to review the PARG changes proposed by the Ministry of Education. The working group were informed by policy work of AMO as well as the Regional Planning Commissioners of Ontario.

On the positive side, the proposed guidelines define a clear role for municipalities in the ARC process. However, many of the proposals are of concern, including:

1. The new Student Information Profile document focuses on student well-being, academic achievement and school board financial matters. Value to the community and local economy are no longer considerations.
2. ARCs will no longer make recommendations, but only comment on or propose options for board consideration.
3. While there is a new formal role for municipalities, it is limited in scope.
4. The timelines for public process are being shortened. Public engagement will be more limited.

#### London Submission to the Ministry of Education

The deadline for submission of comments on the proposed changes was in mid-December, 2014. As a result, there was insufficient time for submitting a report through Committee or Council prior to the Ministry deadline, and draft comments, subject to Council approval, were submitted on behalf of the City.

The following is a summary of the comments submitted:

London urges the Ministry to consider the following:

1. Continue the role of Accommodation Review Committees (ARCs) to make recommendations about potential school closings rather than just commenting and presenting options. This would be consistent with the values of transparency and accountability.
2. Define a clear role for municipalities in the ARC process that includes informing the ARC process, and aiding and participating in the ARC process, if interested. Municipalities should play a greater role early in the process so that a proactive, rather than reactive dialogue can take place. Municipalities should be given opportunity to suggest how a retained school could work as a community hub in the context of how we can create a fiscally responsible model.
3. School Board Administration role in an ARC process be to provide advice and information, rather than sit on the committee as a member.
4. Continue to include in the Student Information Profile (SIP) an evaluation of value of the school to the community and the local economy. See the PPS provisions (attached Appendix 'A') as well as the attached (Appendix 'B') letter dated November 27, 2014 from the Regional Planning Commissioners of Ontario.
5. Provide that the process take a period of time that permits full engagement in the ARC process of both the municipality and the community.
6. Provide that the process and the school board have regard for the policies in the Provincial Policy Statement (PPS) under the Planning Act. We urge the government to articulate a clear view, with due regard for the PPS, of the how the government as a whole and the Ministry of Education view schools in the context of the community. We suggest that some of the changes to the PARG are not consistent with the PPS.
7. Provide that the process evaluate the feasibility of utilizing Community Hub opportunities (School uses, recreation, fitness, child and family health, non-formalized education, connection of students to their community) to fill surplus space, and mandating school boards to consider such options. In this regard, we urge the Ministry to fast track the development of the Community Hub policies that are referenced in the Mandate Letters of the Ministers of Education, Municipal Affairs and Housing, and others. The new PARG measures appear to conflict with the EDU's 2014 mandate letter which acknowledged that it will be engaging stakeholders on two other aspects linked to the school board planning process for excess space. The Pascal Report, while focusing on implementation of Full Day Kindergarten, was to have been followed by looking at how we can combine schools with community hub concept such as Child and Family Centres and other child centred services.

8. Review policies and legislation, including the *Safe Schools Act*, that may unnecessarily impede implementation, or even consideration, of hub opportunities. Policies instead need to focus a dialogue that fosters open and creative dialogue on better consolidation and use of space in a broader community context.
9. Spillover costs such as health costs associated with child obesity as schools move to more bussing and a “big box” approach to accommodating students.
10. The City of London supports the submission of the Association of Municipalities of Ontario (AMO) in response to the consultation.

The Ministry of Education is expected to announce a decision on the proposed PARG in the near future.

<b>PREPARED AND RECOMMENDED BY:</b>	
<b>GRANT HOPCROFT DIRECTOR OF INTERGOVERNMENTAL AND COMMUNITY LIAISON</b>	

## **Appendix 'A'**

Policies in the **Provincial Policy Statement** (PPS, 2014) that relate to school closures in established urban neighbourhoods.

Note that in the PPS a **'public service facility'** is defined as "land, buildings and structures for the provision of programs and services provided or subsidized by a government." This definition is interpreted as including schools.

### **Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns**

1.1.1 Healthy, livable and safe communities are sustained by ... (b) accommodating an appropriate range and mix of residential (including second units, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs

#### **Settlement Areas**

1.1.3 It is in the interest of all communities to use land and resources wisely, to promote efficient development patterns, protect resources, promote green spaces, ensure effective use of infrastructure and public service facilities and minimize unnecessary public expenditures.

1.1.3.1 Settlement areas shall be the focus of growth and development, and their vitality and regeneration shall be promoted.

1.1.3.2 Land use patterns within settlement areas shall be based on (a) densities and a mix of land uses which ... (2) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;

1.1.3.6 New development taking place in designated growth areas should occur adjacent to the existing built-up area and shall have a compact form, mix of uses and densities that allow for the efficient use of land, infrastructure and public service facilities.

#### **Employment**

1.3.1 Planning authorities shall promote economic development and competitiveness by (a) providing for an appropriate mix and range of employment and institutional uses to meet long-term needs

#### **Public Spaces, Recreation, Parks, Trails and Open Space**

1.5.1 Healthy, active communities should be promoted by:

- a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity;
- b) planning and providing for a full range and equitable distribution of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;

#### **Infrastructure and Public Service Facilities**

1.6.1 Planning for infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities shall be coordinated and integrated with land use planning so that they are:

- a) financially viable over their life cycle, which may be demonstrated through asset management planning; and
- b) available to meet current and projected needs.

- 1.6.3 Before consideration is given to developing new Infrastructure and public service facilities:
- a) the use of existing infrastructure and public service facilities should be optimized; and
  - b) opportunities for adaptive re-use should be considered, wherever feasible.
- 1.6.5 Public service facilities should be co-located in community hubs, where appropriate, to promote cost-effectiveness and facilitate service integration, access to transit and active transportation.

### **Transportation Systems**

- 1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.

### **Long-Term Economic Prosperity**

- 1.7.1 Long-term economic prosperity should be supported by: ... (b) optimizing the long-term availability and use of land, resources, infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities;

**Appendix 'B'**



**Regional Planning  
Commissioners of Ontario**

Please direct all correspondence to the office of the Chair.

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November 27, 2014

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Dear Assistant Deputy Ministers:

**Re: Closing of Schools and Provincial Funding Formula**

The Regional Planning Commissioners of Ontario (RPCO) would like to express its significant concerns relating to the closing of schools in communities across Ontario. We believe that the Province's current funding formula forces school boards to close schools in urban and rural areas where enrollment is down, using proceeds from the

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*Haldimand*  
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schools in urban and rural areas where enrollment is down, using proceeds from the sale to fund new school construction. In other instances, the formula forces school boards to consolidate and construct large scale schools, often beyond walking distance for many of the children who use them. Closing schools in neighbourhoods removes important community hubs, undermines the health of our children, weakens communities and often frustrates appropriate regeneration from occurring in urban neighbourhoods. Even more to the point, we run the risk of undermining the very fundamentals of our accessible, high quality, community-based education system.

We believe that the Province should review the current school funding formula and the approach for planning schools across the Province.

As part of this review, we ask that the Province consider the following (negative) planning impacts, within the context of the goals of the Provincial Policy Statement, that stem from the closing of schools in neighbourhoods across the Province.

### **Schools as Community Hubs**

Schools play an important role as community hubs within neighbourhoods. Schools provide open spaces and recreational fields that are often accessible to the public after school hours and serve to supplement local public parks and open space areas, particularly in areas deficient in park space. Classrooms, gymnasiums, meeting rooms and libraries are often used to deliver community recreational and social programs. Schools often share space with daycare facilities, nutritional programs, and non-traditional educational services. Closing schools not only removes important school services in a neighbourhood, but also removes these important community activities.

Schools provide an identity for neighbourhoods – for children, their parents and even those who don't use school services directly. They serve to provide children with a connection to their neighbourhood and community as a whole. Removing them can have significant impacts on the way that children think about their communities, their sense of place and even their sense of self. This can be particularly significant within rural communities and highly urban neighbourhoods, with the potential of creating "education deserts".

### **Planning for Healthy Communities**

The Provincial Policy Statement (2014) clearly states the province's desire and requirement for municipalities to plan for healthy communities. Closing schools within neighbourhoods is a significant detriment to this goal. Recent studies<sup>1 2</sup> conducted by Western University professor Dr. Jason Gilliland concluded that a child's propensity to walk to school is dictated first and foremost by the distance between that child's home and school. It is well understood that increasing numbers of Ontario children are obese

<sup>1</sup> Larsen, K., J. Gilliland, & P.M. Hess (2012). Route based analysis to capture the environmental influences on a child's mode of travel between home and school. *Annals of the Association of American Geographers*, 1021-18. [http://www.theheal.ca/uploads/pdf/LarsenEtAl\\_2012\\_Route-BasedAnalysis.pdf](http://www.theheal.ca/uploads/pdf/LarsenEtAl_2012_Route-BasedAnalysis.pdf)

<sup>2</sup> Larsen, K., J. Gilliland, P.M. Hess, P. Tucker, J. Irwin, & M. He (2009). The influence of the Physical Environment and Sociodemographic Characteristics on Children's Mode of Travel to and from School. *American Journal of Public Health*, 99 (3), 520-526. [http://www.theheal.ca/uploads/pdf/LarsenEtAl\\_2009\\_InfluencePhysicalEnvironment.pdf](http://www.theheal.ca/uploads/pdf/LarsenEtAl_2009_InfluencePhysicalEnvironment.pdf)



and facing health problems associated with such obesity. When a school is close to home, the likelihood that a child will walk to and from school – perhaps even at lunchtime – is significantly greater.

Numerous studies show that the majority of Ontario children are not physically active enough for optimal growth and development. Walking as a form of transportation can play a significant role in helping children achieve much needed physical activity. Closing schools, such that children are no longer within reasonable or safe walking distance of their school, or where children are bussed to school, takes this opportunity away.

### **Protecting Community Assets**

Schools are vital community assets – this is demonstrated by the fact that schools are one of the first elements identified in designing any plan for a new neighbourhood. These assets need to be protected. We know that urban regeneration is taking hold across North America and people's preferences for where they live are changing. Changes in birth rates, immigration trends, the cost of oil/energy and many other factors can have an impact on where people choose to live.

Closing schools in response to recent trends is short-sighted. When schools are closed within neighbourhoods and ultimately sold, the opportunity to use these properties and facilities in the future, should the demand for them return, is lost. The cost of assembling land for the purpose of establishing a new school at a future date, within an urban context, is likely cost-prohibitive. Existing school properties are resources that should be protected as important long term community assets and the risk of losing them in the face of uncertain long-term demand should be avoided. Neighbourhoods evolve over time and the demographics in neighbourhoods reflect these cyclical changes. Neighbourhoods which have shown a decline in student enrolment have over time shown to once again have increased enrolment as neighbourhoods transform over time.

### **Promoting Resilient Development and Urban Regeneration**

Schools are public uses with important relationships to bigger picture city plans. Consistent with the province's goals for infill and intensification, many communities have been working hard to regenerate urban neighbourhoods through the use of community improvement plans, brownfield revitalization initiatives, infrastructure renewal projects, civic space investments and an assortment of incentives. The removal of schools from urban neighbourhoods can significantly undermine these initiatives, making it difficult to attract families and other demographic segments that rely upon schools and the community hub functions that they deliver. This can also impact the economic investment in communities as employers look to what a community has to offer for their employees including access to schools.

Urban regeneration is key to the success and sustainability of cities. Such regeneration creates small business opportunities, utilizes existing infrastructure and services, and reduces the need for outward expansion to accommodate population growth. It creates opportunity for higher forms of transit service, reduces energy consumption and also reduces greenhouse gasses. All of these important goals can be frustrated by the closure of schools in urban neighbourhoods.

## **Rural**

The sustainability of rural communities can also be significantly impacted by the closure of schools in rural neighbourhoods. These schools are often clustered with other public facilities such as playing fields, arenas, community centres and other social infrastructure. These hubs are critical focal points for rural neighbourhoods, where residences are often spread out beyond reasonable walking distances. They represent a rural community's identity and social binder. Losing these schools can be disastrous for rural neighbourhoods.

## **Accommodation Review Committee Process**

We believe that the Accommodation Review Committee process that is used by school boards to consolidate and close schools can be extremely divisive. It pits neighbourhoods against each other and leaves lasting divides between them well after the process is over. It deflects consideration from why a school is closing, or if a school really does need to close, to a discussion focused around which school (of two or more) will be closed. It is difficult to understand how this process can be considered a positive form of genuine community engagement.

## **Programming and Cost Savings**

We understand that the premise for the current Provincial funding formula is that larger schools can offer superior programming to smaller schools and, furthermore, significant cost savings can be realized through consolidation. We question whether such an important consideration as the health and well-being of children and the goal of healthy and sustainable communities should be sacrificed for the purpose of cost savings. The literature appears to offer differing opinions on whether programming and educational experience is truly superior within large schools – even if a broader range of options can be offered.

## **Creative Options to Keep Schools Open**

The Regional Planning Commissioners of Ontario believe there are creative options to consider that can keep schools open in neighbourhoods. While these would require a change to the underlying approach of the current funding formula, they could help protect the long-term asset provided by school properties. For example, partnering with other community facilities and functions to lease vacant portions of schools can help to create neighbourhood hubs, while allowing for schools to shrink and expand into the existing space as needed over the long term. Sharing resources between multiple schools to fill programming gaps can help to offer more recreational, technical, and social options for those attending smaller schools. Partnership opportunities with private sector enterprises may also be possible to help small schools remain sustainable over the long-term.

## **Summary**

There is a significant body of research concerning the current Provincial practice of closing schools in neighbourhoods.<sup>3</sup> The Regional Planning Commissioners of Ontario

<sup>3</sup> For example, a growing body of research is provided by Dr. Mark Seasons at the University of Waterloo and Dr. Bill Irwin at Huron College, Western University at the following web site: School Closure Policy Research <http://env-blogs.uwaterloo.ca/schoolclosures/about-this-research>  
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believe that schools play a vital role as community hubs and focal points within neighbourhoods. Closing these schools can do irreparable harm to neighbourhoods, undermining their long-term viability as strong and healthy communities. We believe that the Province should review the current school funding formula and the approach for planning schools across Ontario. Our community's and our children's health is at stake. We would be pleased to be a part of that review.

Yours truly,



Rob Horne, MA, MCIP, RPP  
Chair  
Regional Planning Commissioners of Ontario

cc : Regional Planning Commissioners of Ontario  
Mr. Mike Murray on behalf of the Regional and Single Tier Chief Administrators of Ontario  
Dr. Mark Seasons, President, Association of Canadian University Planning Programs