

Staff Report

Presented By: Candace Hamm, Development Services Officer

Meeting Date: May 20, 2025

Subject: Bluewater District School Board Administrative Procedure for Holding Zones and Holding Schools

Attachment(s): Notice of Adoption AP 3101-D – Holding Zones and Holding Schools
BWDSB Administrative Procedure for Holding Zones and Holding Schools

Recommendation

That Council endorse the comments in this report and instruct staff to forward them to the Bluewater District School Board.

Report Summary

Bluewater District School Board (BWDSB) adopted Administrative Procedure Holding Zones and Holding Schools (AP 3101- D) on November 27, 2024. This report outlines the procedure and potential future impacts to the Town.

Background/Analysis

On April 10, 2025, a Notice of Adoption dated February 25, 2025, was forwarded to the Town indicating that BWDSB Administrative Procedure AP 3101-D – Holding Zones and Holding Schools (Administrative Procedure) was adopted by the School Board on November 27, 2024.

The [BWDSB 2024-2025 Long-Term Accommodation Strategy \(LTAS\)](#), which aligns with Ministry of Education legislation under the Education Act, includes recommendations for short, medium and long-term actions related to student accommodation and capital planning. The implementation of a holding zone policy was recommended as a board wide short-term action within the LTAS. The Administrative Procedure for Holding Zones and Holding Schools emanates from [BWDSB Policy BP 3101-D Accommodation Review - School Program and Facility Efficiency](#).

The intent of the Administrative Procedure for Holding Zones and Holding Schools is to mitigate enrolment pressures arising from new residential developments, ensuring that schools do not exceed their capacity. The procedure includes guidance on a recommended clause to be included in subdivision agreements, specifically outlining a condition for municipalities to incorporate into their development approval process. The procedure also established formal

guidelines for the School Board for the designation and management of Holding Zones and Holding Schools to accommodate students moving into newly constructed homes within the BWDSB's jurisdiction.

The BWDSB circulated the administrative procedure to all municipal partners (April 10, 2025) within their jurisdiction to clarify the board's role in school accommodation planning, especially in the context of development approvals. By sharing the procedure, the BWDSB is aiming to foster greater collaboration with municipal partners, strengthening their shared commitment to effective community planning and management of school capacity.

As of the date of writing this report, the BWDSB has not designated any Holding Zones or Holding Schools in the Town of Saugeen Shores. Currently, the only designated Holding Zone in the BWDSB's jurisdiction is the [Dundalk Area - Grade Relocation and Holding Zones](#), within the Township of Southgate.

In review of the BWDSB Administrative Procedure AP 3101-D – Holding Zones and Holding Schools, topics that are of key interest to the Town have been outlined in this report and further examined as they relate to or affect the local context of Saugeen Shores, with an analysis of the impact on the Town, and a recommended comment.

Holding Zone Subdivision Agreement Clause

The following wording is included in the Administrative Procedure as an example of a Condition of Draft Approval that may be recommended by the BWDSB for inclusion in a Subdivision Agreement between a developer and the Town as part of subdivision approval process:

“The developer agrees to include in all of its agreements of purchase and sale with purchasers of residential lots and blocks, a provision advising such purchasers that the construction of additional public school accommodation is dependent upon funding approval from the Ontario Ministry of Education and, as a result, the property may be designated as part of a “Holding Zone” by Bluewater District School Board and that any students residing in such Holding Zone may be designated to attend a “Holding School” until a long-term accommodation solution is in place. There can be no assurance that a new elementary or secondary school may be built to accommodate students residing within the Holding Zone.”

Analysis

As part of the regular Planning Act process, applications are circulated to the BWDSB by the County of Bruce. As outlined in the Administrative Procedure, when schools are at risk of exceeding their total available capacity, the BWDSB will recommend a Condition of Draft Approval, such as the example above, that will require developers to clearly inform prospective homebuyers that the property may be designated as part of a holding zone, and that students may be temporarily assigned to a holding school until a permanent accommodation solution is established.

Saugeen Shores Context

Through discussion with representatives from the BWDSB, it is the intention of the School Board to only recommend Holding Zone/Holding School Conditions of Draft Approval in instances where student enrolment numbers and school utilization are anticipated to be significantly impacted by new residential development within a school attendance area. The recommendation by the BWDSB for the inclusion of a Holding Zone Condition as part of the planning approval process is an early indicator that a Holding Zone designation is required or is being considered by the Board for a particular area.

The potential impacts to the developer, and the Town as a whole, as a result of the proposed Condition, even on a temporary basis, should be carefully considered by the Town when/if a Holding Zone condition is recommended by the BWDSB for future developments in Saugeen Shores. Understanding the status of funding approvals from the Ontario Ministry of Education and having knowledge of the long-term accommodation solutions proposed by the School Board will be factors in this consideration.

Recommendation 1

That the Town and the Bluewater District School Board work together to strengthen our relationship and enhance our partnership.

Recommendation 2

That the BWDSB keep open lines of communication with the Town regarding anticipated impacts to student enrolment numbers and school utilization resulting from new development proposals.

Recommendation 3

That the Town, in conjunction with the County of Bruce Planning and Development Department, seek out opportunities to obtain preliminary feedback from the BWDSB during the pre-consultation stage for planning and development applications.

Designation of Holding Zones and Holding Schools

The procedure permits the BWDSB to designate Holding Zones and Holding Schools and temporarily assign students from new developments to schools with available space until long-term accommodation solutions are implemented. Holding Zones and Holding Schools are defined in the Administrative Procedure as:

“Holding Zone: an area defined by a geographic boundary, within an attendance area (usually with high concentrations of new or imminent development), for which the trustees have approved that students residing in it are to attend a specified school based on available capacity, until such time as long-term accommodation and related revised attendance areas can be established.”

“Holding School: a school designated by the trustees to accommodate students from one (1) or more holding zones and is not part of the student’s attendance area. Examples of a holding school situation include, but are not limited to, enrolment pressure, construction of a new school, or renovation of an existing designated home school.”

Section 3.1 of the Administrative Procedure outlines the procedure for the Designation of Holding Zones and Holding Schools, and Section 3.2 outlines the process for Notification. In the event that a Holding Zone is designated by the Board of Trustees, and a determination is made in respect of a related holding school(s), the school administrator; the chairs of school councils and presidents of home and school associations; parents and guardians of any student that has a primary address in the holding zone; the owner of property yet to be developed if a residential plan of subdivision has been submitted and the BWDSB is aware of the development; and the Town will be notified.

Analysis

Student enrolment numbers and school utilization can be significantly impacted by new residential development, and the BWDSB Holding Zones and Holding Schools Administrative Procedure provides the School Board with a new tool to help mitigate enrollment pressures.

Saugeen Shores Context

As seen in the LTAS, the BWDSB researches many key metrics as part of their student accommodation and capital planning. Saugeen Shore is the fastest growing municipality in Bruce County, and it stands to reason that the School Board would be very interested in new development proposals in the Town and closely monitoring enrolment numbers and school utilization. Should it be determined by the BWDSB that one or more Holding Zones and Holding Schools are required as a short-term solution to alleviate enrollment pressures in the Town of Saugeen Shores, the potential impacts to the community should be closely evaluated. A number of factors would be considered by the BWDSB when determining an appropriate Holding School, with the goal of accommodating Saugeen Shores students within the Saugeen District School Group boundary before considering schools outside of the district.

Recommendation 4

That the Town of Saugeen Shores request to be notified by the BWDSB and engaged in the process as early as possible if a Holding Zone is to be designated by the School Board for lands within the Town, and/or if a Holding School is required to accommodate students within the Saugeen District School Group.

Linkages

- Strategic Plan Alignment: Pillar 3: Building Valued Relationships
- Business Plan Alignment: Development Services Business as Usual

Financial Impacts/Source of Funding

No costs or revenue is associated with this report.

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