



August 10, 2022

Legislative & Planning Services  
Department  
Planning Services  
1151 Bronte Road  
Oakville ON L6M 3L1

Mr. Gabe Charles MCIP, RPP  
Director – Planning Services  
Town of Oakville

**RE: Draft Town of Oakville Parks Plan - 2031**

Thank you for the opportunity to review the Draft Town of Oakville Parks Plan – 2031. Regional Planning staff have reviewed the document prepared by the Planning Partnership NBLC and provide the following comments for consideration.

### **General Comments:**

1. The Region of Halton's vision believes in healthy communities as outlined in Section 31 of the Regional Official Plan (ROP). Safe and equitable access to parks and recreational opportunities are part of this vision and Halton supports the Town of Oakville's efforts.
2. When considering the location of parkland, the Town is encouraged to locate passive parks adjacent to the Natural Heritage System (NHS), where appropriate, to ensure that the ecological functions of the NHS will be maintained and enhanced.
3. The Town is encouraged to consider Regional Official Plan Amendment 48 (ROPA 48) which established a hierarchy of strategic growth areas and is supportive of the provision of parks and open space that promotes the development of complete communities, strengthens a pedestrian-oriented environment and, supports opportunities for transit and active transportation.
4. The Greenbelt Plan (2017) maps Bronte Creek, Fourteen Mile Creek and Sixteen Mile Creek as part of the Greenbelt Urban River Valley in Oakville. It is recommended the Town consider the dedication, or acquisition of lands adjacent to the Greenbelt's Urban River Valleys.

### **Section Specific Comments:**

5. **Section 2.2 – Town of Oakville Official Plan, Natural Heritage** subsection states that *Passive recreational activities such as walkway trails and cycling paths may be permitted to facilitate the connectivity of Oakville's open space network. The feasibility of these trail systems may differ based on the ecological sensitivity of the natural heritage area as well as the safety of the trail.*

#### **Regional Municipality of Halton**

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Comment:

The ROP is supportive of passive parks located adjacent to or within the NHS as they provide the greatest opportunity for the preservation and enhancement of the NHS compared to active parks. Section 117.1 of the ROP outlines a variety of uses that may be permitted in the NHS subject to demonstrating that the proposed development and site alteration will not result in negative impacts to the key features and their ecological functions of the NHS. Within the NHS, non-intensive recreation uses such as nature viewing and pedestrian trail activities may be permitted. Therefore, parks that are located adjacent to or within the NHS should be supportive of such uses outlined in Section 117.1 of the ROP.

6. **Section 2.4 – Development Patterns/Density third paragraph** states that *the Growth Plan, implemented first through the Region of Halton Official Plan, requires that a minimum percentage of all residential development be accommodated through intensification opportunities. In effect these policies dictate that urbanization and intensification trends will continue and occur at greater intensities throughout the GGH.*

Comment:

In addition to mentioning ROP intensification trends and targets, the following additional objectives outlined in Sections 79 and 81 of the ROP should be included as part of the analysis for the Region's Strategic Growth Areas and Major Transit Station areas identified in Oakville as they highlight the provision of parks and open spaces for these areas. These objectives should also be considered in **Section 4.6 – Achieving the Town's Parkland System**, Residential Intensification within the defined Strategic Growth Areas subsection (page 40).

- Strategic Growth Areas:
    - **To provide high quality public parks and open spaces** with site design and urban design standards that create attractive and vibrant places to promote the development of complete communities. (Section 79 (7) of the ROP)
  - Major Transit Station Areas
    - To provide a range and mix of transit-supportive uses, such as residential, retail, office and public uses, as well as public service facilities and **parks and open spaces** that support the area in a pedestrian-oriented urban environment. (Section 81 (2) of the ROP)
7. **Section 2.4 – Development Patterns/Density fourth paragraph** states that *other new greenfield development opportunities are still permitted and anticipated in Oakville with a focus on north Oakville. The Growth Plan also mandates a minimum density target for greenfield development that is substantially higher than what has been achieved over time in Oakville's traditional neighbourhoods.*

Comment:

For greenfield development in north Oakville, Section 77 (2.4) e) of the Regional Official Plan should be included and considered as part of park planning which requires *development occurring in Designated Greenfield Areas to **create high quality parks and open spaces** with site design standards and urban design guidelines that support opportunities for transit and active transportation.*

8. **Section 3.1 – Overview:** This section speaks to parks as vital to creating healthy and complete communities.

Comment:

Consider including reference to Halton's Healthy Community Guidelines. *The purpose of the Healthy Communities Guidelines is to identify attributes of a healthy community so that the Region and Local Municipalities can work together during Area-Specific plans and long range planning policy review processes to achieve Healthy Communities.* The Healthy Community Guidelines identify seven attributes of a healthy community, one of which is the natural environment and open space. Elements of 'Natural and Open Space' identified in the guidelines include the Natural Heritage System, parks and public spaces and, pathways and trails. The guidelines can be found here:

<https://www.halton.ca/Repository/Healthy-Communities-Guidelines>

9. **Section 3.2 – Quality of Place/Quality of Life:** This section speaks to how parks contribute to placemaking and quality of life, and the economic and environmental value of investing in the parks system.

Comment:

The ROP recognizes the benefits and multifaceted value of parks and, supports the Town's investment in the parks system as parks have the opportunity to meet the goal of the NHS and implement the Region's objectives for the NHS outlined in section 114.1 of the ROP. The objectives of the NHS include, but are not limited to; protecting and enhancing natural features and functions, contributing to a continuous natural open space system, and providing opportunities where appropriate for passive, outdoor recreational activities in the NHS. The ROP also provides direction on strategic locations for consideration in relation to the parks system and the NHS. The ROP encourages local municipalities or other public agencies to obtain parts of the NHS as per Section 118 (7) and, to locate open spaces adjacent to or near the NHS as per Section 118 (5) of the ROP. The Region also promotes the donation of privately owned lands in the NHS to public agencies or charitable organizations for the protection of the ecological functions and features as outlined in Section 118 (9) of the ROP. Similarly, Section 118 (15) of the ROP provides direction for properties immediately adjacent to Lake Ontario that are subject to a development or redevelopment application in which the Region encourages the Local Municipality to obtain, through dedication, agreement or purchase, suitable waterfront property along Lake Ontario for

public access and as part of a continuous trail system along or adjacent to the waterfront.

**10. Section 4.3 – Meeting the Town’s Active Parkland Target of 2.2ha/1,000**

**people** suggests *refining the definition of Active Parkland to include a more fulsome list of recreational opportunities, including non-intensive recreational activities such as trails and the enjoyment of nature.* The potential redefinition of Active Parkland would also suggest the need to consider the utilization alternative land resources including unconstrained lands within the Natural Heritage System, the acquisition of lands currently owned by the Province/ Conservation Authority, as well as other innovative approaches in order to maintain the long-term achievement of the Active Parkland Target. Further, Recommendation 3 states it is recommended that the Town consider the dedication, or acquisition of:

- *Unconstrained lands that can be added to the Natural Heritage System for the purposes of public parkland; and/or,*
- *Provincially owned lands within the Town’s boundaries, including Bronte Provincial Park and suitable lands owned by the Conservation Authority.*

**Comment:**

It is recommended the Town also consider the dedication, or acquisition of lands adjacent to the Greenbelt’s Urban River Valleys in Oakville including; Bronte Creek, Fourteen Mile Creek and, Sixteen Mile Creek as the Greenbelt Plan promotes *the provision of a range of natural settings on publicly owned lands for recreational, cultural and tourism uses, including parkland, open space land and trails in Urban River Valleylands* as per Policy 1.2.3. Section 3.3 of the Greenbelt Plan has specific policies with respect to parkland, open space and trails and these policies would apply to areas designated as Urban River Valleys as noted in Policy 6.2.4.b of the Greenbelt Plan.

When the Town is considering updating the definition of ‘active parkland’, the permitted uses in the NHS (including buffers), outlined in Section 117.1 of the ROP still apply. Parks located adjacent to or within the NHS that support passive uses provide the greatest opportunity for the preservation and enhancement of the NHS. Halton’s NHS is a systems approach to protecting and enhancing natural features and functions and is scientifically structured based on Key Features and components and is mapped on Map 1 of the ROP. Section 117.1 of the ROP permits a variety of uses that may be permitted in the NHS subject to demonstrating that the proposed development and site alteration will not result in negative impacts to the Key Features and their ecological functions. For example, within the NHS, non-intensive recreation uses such as nature viewing, pedestrian trail activities and, forest, fisheries and wildlife management may be permitted. Therefore, regardless of the definition of passive or active parks, any park that is located adjacent to or within the NHS should be supportive of such uses outlined in Section 117.1 of the ROP. Further, traditional active parks, such as playgrounds, sports fields etc., may have potential impacts on the NHS due to

construction, ongoing maintenance and possible user disturbance and encroachment. Therefore, it is recommended that as part of the design for active parks that support such uses, there is adequate area outside of the NHS for these types of uses that provide a sufficient setback from the NHS in order to minimize impacts to the system and its ecological function.

The Regional Official Plan encourages the development of trails within the NHS. Where the Town of Oakville is considering the development of trails within the NHS, the requirements outlined in section 118 (6) of the ROP must be met which include:

- *the trails are located on publicly owned lands or are part of the Bruce Trail;*
- *the trails and associated activities do not impact negatively on ecologically sensitive areas or resource uses such as agricultural operations;*
- *proper regard is given to the issues of trespassing on private properties and liability in the event of property damages or personal injuries; and*
- *adjacent landowners potentially affected by the trails are consulted.*

In addition to the requirements noted above, we recommend that trail design should be completed in advance of any area specific plan and plan of subdivision as it needs to ensure that if trails are being proposed within the NHS, their designs and functions are permitted in accordance with the ROP and will not result in impacts to the NHS. Further, the location and design of the trails within the buffer to Key Features may warrant a large buffer width to ensure that no negative impact to the Key Features and their ecological function can be achieved.

- 11. Section 4.10 Administration of the Town's New Parkland Dedication By-law, Land that should Count/Not Count for Parkland Dedication subsection, Recommendation 44,** states, that *it is recommended that the Town of Oakville identify the following as potentially being acceptable lands for parkland dedication, but at a reduced rate: Lands that are within the designated Natural Heritage System, but are not specifically identified as a core natural feature;*

Comment:

In addition to core natural features, buffers are a component of the NHS and as such, active parks would generally not be supported in buffers. However, the Region encourages opportunities within the NHS for passive, outdoor recreational activities. Therefore, passive parks would be more appropriate in buffers provided that the proposed use demonstrates no negative impact to the NHS can be achieved.

- 12. Section 4.10 Administration of the Town's New Parkland Dedication By-law, Land that should Count/Not Count for Parkland Dedication subsection, Recommendation 45,** states, *it is recommended that the Town of Oakville identify the following as not acceptable lands for parkland dedication: Lands that*

*are an identified core natural heritage feature as defined in the Official Plan, or an applicable Secondary Plan, or as identified in an Environmental Impact Study accepted by the Town.*

Comment

We recommend that this should be further clarified to include lands identified as Key Features as defined in Section 115.3 (1) in the Regional Official Plan.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

*Heather Ireland*

Heather Ireland  
Senior Planner – Environment  
Planning Services  
Halton Region Legislative & Planning Services

August 29, 2022

Gabe Charles  
Director – Planning Services  
Town of Oakville  
1225 Trafalgar Road  
Oakville, ON L6H 0H3

Dear Gabe:

**RE: Oakville Parks Plan 2031  
Town of Oakville**

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Thank you for providing the Halton Catholic District School Board (“Board”) with an opportunity to comment on the draft Oakville Parks Plan 2031, dated June 2022. It is understood that this is a strategic document that will provide direction for new parkland throughout the Town of Oakville, particularly in the urban centres and corridors. It is also understood that a new Parkland Dedication By-law will be provided as part of the Parks Plan.

Presently the Board has a total of 16 elementary and 3 secondary schools established in the Town of Oakville, and the Thomas Merton Adult Learning Centre Oakville Campus. Based on enrolment counts for the 2021-2022 school year, the Board serves over 10,623 students within the Town of Oakville, which represents a total 10-year enrolment decrease of 4% since 2011. Based on the [2022 Long-Term Capital Plan](#), enrolment is projected to increase by 22% over the next 10 years as a result of development in North Oakville. Note that enrolment projections include students expected from proposed developments through planning applications circulated to date, but do not include students expected from secondary plan or growth areas where applications have not been circulated. As a result, it is expected that student enrolment will increase further over the long-term from these additional developments.

HCDSB currently has one (1) school facility in North Oakville, St. Gregory the Great Catholic Elementary School. To address increasing enrolment demands, the Board has four (4) planned elementary schools and one (1) planned secondary school. The planned facilities currently identified in the 2022 Long-Term Capital Plan are as follows:

- North Oakville #4 Catholic Elementary School – expected to open for September 2023
- North Oakville #3 Catholic Elementary School – required for September 2025
- North Oakville #5 Catholic Elementary School – required for September 2029
- North Oakville #2 Catholic Elementary School – required for September 2033
- North Oakville #1 Catholic Secondary School – required for September 2033

The timing of above school requirements may change as new development applications are circulated and enrolment projections for the area change.

The Board does not currently have school sites designated in the Strategic Growth Areas. The Board has typically seen lower yields from townhouses and apartment units compared to single-detached and semi-detached dwelling units in the past. However, market conditions and affordability may push families away from ground-oriented housing, which may increase student yields from higher density unit types in the future and school sites may be required to accommodate students. The Board will continually monitor student yields to ensure projections are accurate and that the school accommodation needs of the future can be met.

Based on the Board’s review of the draft Oakville Parks Plan, dated June 2022, the Board would like to submit the following comments as it pertains to school board facilities.

## 1.2 Greenlands & Parks

In addition to the existing school board facilities provided in the map on Page 4 of the Plan, the Board received funding approval from the Ministry of Education to construct North Oakville #4 Catholic Elementary School, located at 420 Threshing Mill Boulevard. This school is adjacent to William Rose Park and is expected to be completed and ready for students by September 2023 based on current estimates.

It was noted not all school board facilities are identified in the map on Page 4. As such, the Board would like clarification on the criteria used to identify certain school sites as a school board use parkland classification, and the expected use/availability of board open space for Town/community needs.

It should be noted that while school sites offer open space in the community, they are designed to provide outdoor space for students to support their curriculum requirements (e.g., Health and Physical Education, Science and Technology). The Board does have shared use agreements with the Town to allow the use of Board facilities outside of school hours when required on a case-by-case basis, and will continue to support the use of spaces for the community where it is safe and does not adversely impact student learning.

### 4.4 Establishing a Context Appropriate Parkland Hierarchy The Urban Park Hierarchy for the Strategic Growth Areas

Recommendation 5 states that Public Common (PC) spaces shall be coordinated with urban school sites, where possible. It is understood that the Public Common urban park type provides the largest park typology; provides multifunctional flexible space for programming; primarily be soft surfaced and green, but may include hard surface elements; and may include larger program spaces such as small sport fields and play elements for children.

The Board has not currently requested school sites in the Town of Oakville's Strategic Growth Areas. However, growth around the GO stations and Strategic Growth Areas may result in the school board needing to acquire sites and/or explore alternate build methods for education program delivery (e.g. podium schools, compact schools). In these communities, especially where a traditional school site cannot be built, land will continue to be required for students for outdoor play areas as part of their regular day-to-day programming.

If school sites are required in Strategic Growth Areas, it would be beneficial for students and the Board to ensure that school sites are located adjacent to parks with the ability for students to access the park space during school hours. As such, the Board is generally supportive of coordinating the co-location of school sites with parks where it provides the maximum opportunity for creating partnerships and site space efficiencies. In addition, the Board would support a coordinated planning process to ensure that school sites and park uses are acquired and delivered at the same time so students can access the green space.

### The Park Hierarchy for the Established Neighbourhoods, North Oakville and Other Greenfield Communities

Recommendation 7 states that Community Park (CP) spaces are typically co-located with Community Centres, where possible. The Board also supports the co-location of parks with the Community Park type and secondary schools, where possible. An example of an HCDSB secondary school located adjacent to a community centre and large Town parkland is Holy Trinity Catholic Secondary School, which is adjacent to River Oaks Community Centre and River Oaks Park. The co-location provides access for secondary students to community centre facilities, sports fields and programs at the local community centre. The co-location may also provide benefits to the Town through Shared Use Agreements for space on school board lands.

Recommendation 7 also states that Neighbourhood Park (NP) spaces may be co-ordinated with school sites, where possible. The Board is supportive of co-location with neighbourhood parks as it may provide opportunities for efficiencies, such as shared parking, and may reduce the overall size required for school sites.

#### **4.8 Options for Ownership of the Town's Parkland System**

Recommendation 28 states that the Town would prefer to acquire Public Common parkland in the Strategic Growth Areas through Fee Simple Parkland ownership, i.e., be wholly owned by the Town. However, the Town may explore alternatives of Strata Ownership and/or Privately Owned Public Spaces (POPS). In the event the Town proceeds to acquire parkland through alternate means and the parkland is adjacent to or co-located with a future school site, the Board may require notice at the earliest opportunity as it may impact the Board's timeline for site acquisition and/or creation of alternate school builds.

#### **4.10 Administration of the Town's New Parkland Dedication By-law**

Recommendation 42 states that notwithstanding the list of exemptions identified in the Parks Plan, the Town may reduce the parkland dedication/cash-in-lieu requirement for any land use or specific development, at the discretion of Council. In Appendix IX, Parkland Dedication Practices in Other Jurisdictions, it notes that majority of by-laws reviewed provide exemptions to parkland dedication to land, buildings and structures owned by and used for the Town, region, municipality, province and federal government; as well institutional uses such as schools. The Board is supportive of exempting schools and school board uses from parkland dedication requirements.

#### **General Comments**

School board facilities play an important role in providing recreational opportunities and greenspace for the local community after school hours through shared use agreements. In addition, there may be opportunities for students to use Town parks for its curriculum needs, especially when school sites are located adjacent to parkland and there is seamless access between both uses.

The Board continues to support working with the Town to create partnerships and find land use efficiencies between adjacent uses wherever possible in new development areas, in both the suburban development context, such as North Oakville, and the urban development concept, such as in Strategic Growth Areas. Furthermore, the Board is willing to work with the Town of Oakville to create Community Use hubs associated with school uses to the benefit of students and the wider community.

The Board generally supports neighbourhood design that encourages active transportation of students to/from school. This includes the creation of a safe, accessible, and well-maintained active transportation/trail network that connects various parts of the community to school sites. In addition to health benefits to students, increased use of active transportation may also reduce traffic in and around school sites during drop off and pick up times.

Board staff is available should the Town require further discussions on these comments and future circulations on the Parks Plan and Parkland Dedication By-law as it pertains to school board facilities. Please continue to keep the Board apprised of the plan and by-law.

If you have any questions regarding the aforementioned, please contact the undersigned.

Yours truly,



Dhilan Gunasekara  
Planning Officer

cc: A. Lofts, Superintendent of Business Services and Treasurer of the Board  
R. Merrick, Superintendent of Facility Management Services  
B. Vidovic, Senior Manager of Planning Services, Planning Services  
K. Panzer, Planning Officer, Planning Services  
L. Choi, Halton District School Board

August 18, 2022

Mr. Gabe Charles, Director of Planning  
Mr. Chris Mark, Director Parks and Open Space  
Town of Oakville  
1225 Trafalgar Road  
Oakville, ON L6H 0H3

Gentlemen,

In response to the recent Council meeting of August 3, the Draft Parks Plan and associated online materials, following are comments from Coronation Park Residents Association (CPRA).

Given its location in the Southwest, as a long-established community in close proximity to one of Oakville's largest and best loved parks, the CPRA membership enjoys the innumerable benefits that green space delivers to our daily lives. It is for that reason we wish to ensure that all residents of Oakville, especially those who will live in our Strategic Growth Areas, receive the same consideration. We are committed to supporting policies that will deliver those benefits and equally committed to opposing those that do not.

A review of preliminary policy direction elicits the following:

**1. Commit to establishing parks as a top priority in high density areas.**

Green space/parks are essential to liveability, especially in areas of high density. Beyond recreational space for physical and mental benefits, urban parkland provides crucial relief to stormwater systems, improves local air quality, captures carbon and lessens the urban heat-dome effect. Urban green space creates wins for environmental sustainability, health, and health equity. Access to these spaces must be publicly available and within easy walking distance. Families need parks and they need them nearby.

While the prospects of increasing our system of parks with a suggested eco-park is appealing and something we could aspire to in future, our immediate need is to ensure our SGAs are given the critical green space they need. Allocating funds for the purchase of land outside the SGAs, is not a policy we support. It is crucial we show our commitment to properly planned growth that delivers high-quality, vibrant, healthy, liveable communities in high density areas.

We note the Draft Parkland Dedication Policy document proposes to achieve a parkland standard in SGAs of 7.5% to 12% of the net land area - *where opportunities exist*. The

City of Mississauga has set its rate at 12% of the overall area of each SGA. Using Midtown as an example, here's what the proposals would produce:

Midtown SGA	7.50%	12%
Net Area of 43 ha	3.23 ha	5 ha
Gross Area of 103 ha	7.72 ha	12.36 ha

While we understand it is not possible to provide 2.2 ha/1,000 people in SGAs, if we were to choose an average projected number in Midtown to be 40,000, that would result in 88 ha for parkland. The Net Area numbers above suggest an incongruous disparity. Lastly, the same section within the Draft Policy outlines:

I. that the planned urban parkland system within a comprehensively planned SGA be:

- i. Comprised of the Public Common, Urban Square and **Promenade** categories; and,
- ii. Distributed throughout the SGA, such that all residents are within a 2.5 minute walk (200 meters) from a defined Public Common, Urban Square or **Promenade**. *(Please see our references to Promenades below).*

## 2. Urban Green Space. Not Urban Gray Space.

In recognition of the above stated benefits, we see a park as an area of natural and semi-natural space set aside for human enjoyment and recreation or for the protection of wildlife and natural habitats. In other words, urban parks are green, not gray.

Connections, Promenades, Slivers and similar areas are nothing more than walkways, sometimes covered concrete connections between buildings, small planted areas beside sidewalks, or enhancements to retail store fronts. These aren't parks. They are predominantly areas of impervious surfaces. They don't provide green space or deliver the benefits outlined earlier. **They should never be counted into the inventory of green space/parks. Furthermore, Promenades should not be eligible for inclusion in the Parkland Dedication Policy's computation of Land Conveyance.**

## 3. Create What People & the Environment Need

New urban parks should be a networked series of varying green space configurations nested across scales, whereby local smaller parks connect with larger urban parks. This combination enhances amenity value of green spaces by providing greater opportunity for those seeking exercise or those who find smaller parks are not responsive to their use desires.

Such networks help to distribute and disperse users across a wider space. In times of pandemic, for instance, such distribution is safer and adds to the ability for social distancing. We are all aware of the high numbers of people who have flocked to our parks during this pandemic. Residents living in high density urban areas do not have the

ability to step out their door into a garden or back yard for exercise, fresh air or the simple human need for stress relief and relaxation. They need green space at an appropriate distance of appropriate size to give them the liveability they deserve.

There is no question that we will face another pandemic in coming years. These eventualities must become part of our outdoor space planning. Thus, we must ensure high-density neighbourhoods in both horizontal and vertical forms include new, high-quality parks to support residents and workers.

In addition to human needs, we must also recognize the role and importance of parks in supporting biodiversity and as wildlife corridors, and help to contribute to that role.

#### **4. Design Matters**

Green space must be easily accessible and nearby - no more than three to five minutes' walk for most residents. Parks should be simple and not over-designed. Trees, grass, some walkways and a bench: these are the basics most people require in a park. Larger parks can have a strong identity and implied use—for example, active versus passive recreation—but it should also have enough of the 'basics' to satisfy the needs of a broad range of users.

#### **5. Public Not Private**

*Privately Owned Public Space* (POPS) should never be seen as a replacement for public parks. While Toronto and Vancouver have added this practice to their development policies, New York City has experimented with this concept for decades. A study published in 2000 found that “41% of Manhattan’s POPS were, and are, practically useless, with austere designs, no amenities and no direct sunlight.” In addition, about half of New York’s landlords are not in compliance with their POPS agreements. Violations range from minor infractions to making designated POPS space inaccessible or inhospitable (by removing seating or locking gates), and even enclosing and decorating POPS arcades so they become the formidably elegant lobbies of private buildings. New York has learned the hard way that creating and maintaining public space carries the usual caveat attached to offers of a free lunch.

The author of the study concluded that POPS pose three substantial dangers: they undermine zoning requirements; they signal to developers that exemptions are for sale; and they are not equitable, because unlike public parks few POPS are equally accessible to every citizen.

In Toronto, POPS have been used to create a more connected public realm, like a landscaped walkway or small gathering space in the front of a building, but not to replace requirements for parks. However, the “publicness” of POPS have been called into question with disputes over access and encroachment from businesses. And since they’re privately owned, these spaces could be redeveloped over time, as has happened in Vancouver.

*Strata* development has similar challenges. On its face, it seems like a win-win situation. A property owner gets to build something and the city gets a park on top. But in reality, strata parks present a number of logistical, design, and legal challenges with which cities are grappling. The structural integrity of what is below dictates the amount of soil you can place on top, which impacts landscaping. Additionally, when the waterproof membrane separating the park from the structure below needs replacing or maintenance, the park must often be scraped off and rebuilt - our own Town Square. These parks can end up less green because of these factors - an issue when cities facing climate change want to add more greenery for stormwater management and urban heat mitigation.

Aside from the design challenges of strata parks, there's a host of legal and logistical implications, like long-term financial liability for future upgrades.

The advice for municipalities facing park planning in the face of high density growth is to get ahead of development by targeting land acquisition in areas that are slated for growth, as opposed to playing catch up later - an approach in which we are sorely lacking.

**As well, we note that both POPS and Strata are listed on Page 8 of the Draft Parkland Dedication policy as being potentially acceptable for dedication. Based on the information above, we strongly disagree. They should be removed from the policy.**

## **6. Positive Action**

Before we consider Strata, POPS and other privately-owned scenarios, we have other tools and opportunities that must be investigated, developed and employed.

- Pursue agreements with educational and other institutions to expand available open space resources for community use to create 'win-win' partnerships that recognize school yards and other publicly owned open spaces as integral to the overall open space network. Develop opportunities with schools boards to expand and/or create new shared park/open space that would benefit both Oakville and the school boards in enhancing both the quality and quantity of park space accessible for community use. Our SGAs will need schools and those schools need green space, not elevators. Plan these partnerships now.
- Leverage rail transit and hydro-corridors as opportunities to create new park areas and improve connection and access to others. Parks along linear developments or as ribbons of green space bordering these otherwise unused areas can assist in creating additional opportunities for recreation such as bike paths, a place to walk pets or simply a place to walk and rest on a park bench. As well, the Town of Oakville is the majority shareholder of Oakville Enterprises/Oakville Hydro. Use that position to determine what additional real estate holdings currently exist that can be transitioned into green space in SGAs.

- Make strategic use of Oakville's own considerable collection of real estate assets to determine which can be designated for green space immediately or become part of a targeted acquisition plan/ land exchange or other strategy to ensure development of more parks in SGAs.
- Improve and integrate the design of streets and other town-owned land adjacent to parks or recreation spots to enlarge the feeling of park spaces and make the pedestrian experience more seamless, safer, and comfortable.
- The Finance Department reports inform us \$10.8-million and over \$30-million was collected in 'Cash-in-Lieu' payments in 2020 and 2021 alone. Prior funding and ongoing inputs from yearly 'cash-in-lieu' clearly establishes our ability to target strategic land acquisitions to support the provision of sufficient green space in SGAs.

## 7. Park Hierarchy In Growth Areas

**Public Common Parks** and **Urban Squares** are identified as being Primary Park Space in to be employed in growth areas, followed by lesser parks.

We are told typical sizes of Public Commons are a minimum of 8000m<sup>2</sup> (0.8 ha) and can be much larger. Yet, in the Urban Park Hierarchy (page 139) the suggestion is a Public Common of between .75 and 2 ha and expected to serve as a primary green space for a population that is forecast to be 40,000 to 50,000 people.

To put this into perspective, using existing parks, George's Square, between Trafalgar and Reynolds Streets is approximately 10,000 m<sup>2</sup> (1ha) and Wallace Park without the Curling Club is about 15,500 m<sup>2</sup> (1.5 ha).

Similarly, Urban Squares which are primarily hard surfaced, are identified as being larger than 1000 m<sup>2</sup> (0.1ha) but less than 8000 m<sup>2</sup> (0.8 ha) are suggested to be between .25 and 1 ha in size. A local green space example of similar size would be Westwood Park on Kerr Street that is just over 7,000 m<sup>2</sup> (0.7 ha).

How can we possibly expect spaces such as the above to meet the needs of the growth that is projected for our SGAs in locations such as Midtown, Bronte GO and Neyagawa? These examples, combined with earlier comments on the inappropriate classification of Connections, Slivers and Promenades as parks, underscore the critical need for a commitment and a strategic action plan to deliver quality parkland to our SGAs.

In listening to the Council workshop we were struck with what seemed to be an eagerness on behalf of consultants to count as many spaces as possible into the overall number in order to increase the percentage of what can be counted as a park/green space for recreation. Surely we should be more interested in ensuring the green space we create is indeed based on equity and geographic need.

## **8. Administration**

As a final point, we have concern regarding the proposed by-law wherein it includes the following:

*Council hereby delegates to the Director of Planning in consultation with the Director of Parks and Open Space and the Manager of Realty Services, the administration of this Parkland Dedication By-Law, including the authority to:*

*i. Negotiate parkland dedication and/or payment- in-lieu for each development or redevelopment application, and execution of parkland dedication agreements or amendments thereto as may be necessary, in accordance with the provisions of the Town's Parkland Dedication By-Law and the policies of the Official Plan; and,*

*ii. Establish the location and configuration of land required to be conveyed;*

Our two current Directors of Planning and Parks & Open Space are beyond reproach. However, if future holders of those positions were not, there is no regular, ongoing participation by the public or Council to ensure the types of parks and their locations are being created in the best interest of residents. Further, lack of this type of oversight exposes these administrators to increased pressures from some land development proponents who have little to no regard for anything other than profit.

As residents, we not willing to support any plan that does not reflect the treatment of our SGAs with appropriate quantity and type parkland for the benefit of our future residents.

As Abraham Lincoln opined, public sentiment is everything. With public sentiment, nothing can fail. Without it, nothing can succeed.

Thank you for the opportunity to contribute to your information.

Yours truly,

**Pamela Knight**

*President*

**Melanie Rose**

*Vice President*

cc:

Members of Council

CAO Clohecy

Commissioners Bell and Garbe

August 31, 2022

Mr. Gabe Charles, Director of Planning  
Mr. Chris Mark, Director Parks and Open Space  
Town of Oakville 1225 Trafalgar Road Oakville, ON L6H 0H3

Dear Mr Charles and Mr Mark,

I am writing on behalf of the Trafalgar Chartwell Residents' Association (TCRA). Thank you for giving us this opportunity to comment on the Draft Parks Plan after the Council Meeting of August 3, 2022. We are located in South East Oakville, where Midtown, one of the key Strategic Growth Areas (SGA's), is located. We are very fortunate to have many beautiful parks and green spaces located within our boundaries, or very close nearby. We would like to ensure that, with the forthcoming developments and major increase in population density in the SGA's, all current and future Oakville residents will have access to sufficient parkland and green space within easy walking distance.

When looking for a definition of exactly what a park is, and conversely, isn't, the Oxford dictionary describes it as "a large public green area in a town, used for recreation". The Merriam-Webster dictionary describes it as "an area of land set aside for recreation or for its beauty". In each definition, the land is to be used for recreation, either active or passive. It is not a "Connecting Link" (concrete walkway) linking one condominium building to another, nor is it a Sliver Park, Promenade or Pocket Park. These should not be included in the calculation of parkland or green space in SGA's or anywhere else. Parks are large, open, green, living spaces, not small, confined, grey, concrete spaces!

Establishing parks should be done pro-actively and as a top priority in high density areas. Parks must be publicly available, have amenities such as benches and playgrounds, be safe places to get to and be in, and be within easy walking distance for all residents, i.e. 2-3 minutes walk (200m) as outlined in the Draft Policy. Parks are an essential part of the "Livable Oakville Plan", not just to provide space for physical activity and to improve mental health. They help improve air quality, support biodiversity and as wildlife corridors, provide drainage for storm water run-off and crucially, lessen the heat dome effect that plagues many high density developments throughout the world.

In order to maximise the benefits to the residents of these new SGA's, it is important to link these new urban parks, connecting the smaller parks to the larger ones, increasing accessibility and utilization. If the pandemic has taught us anything, it is that fresh air and exercise are vital for stress relief and relaxation, especially if one is confined to a 600 square foot residence.

We fully understand that it is not possible to provide the 2.2ha/1000 people, which is the parkland standard for Oakville, in SGA's. However, in the Urban Park Hierarchy (page 139) of the Draft Park Dedication Policy, the suggestion that a Public Common of between 0.75-2 ha would serve as the primary green space for the 20,000+ residents of Midtown is nothing short of ridiculous. Nearby Wallace Park is approximately 1.5 ha and George's Square is approximately 1 ha. Walking there daily during the summer holidays and seeing 30 or so children playing in George's Square, they take almost a quarter of the space. Imagine even 1/10<sup>th</sup> of the midtown residents trying to use the proposed Public Common at any one time!

A space of this size can never meet the needs of the residents in the SGA's. In addition, counting as many spaces as possible as parks, such as connections, slivers and promenades, inflates the percentage of what can be counted as green space. This is inappropriate as none of these can be used for recreation

– the very definition of what a park provides. Mississauga does not count corridors, trails, POPS, schoolgrounds, cemeteries and non-accessible parkland in its calculation of green space.

We do not believe that Privately Owned Public Space (POPS) should ever be seen as a replacement for public parks. The design, ongoing access and maintenance, and potential for redevelopment into something other than a park, make this an option fraught with problems. Strata developments have other challenges, including structural integrity – look at our Town Square as an example – and are very costly to maintain in the medium to longer term. There are better ways to create parks and green spaces.

One such way would be to utilise existing school yards to expand and create new parks that will benefit the entire community. New schools will also be required to educate the children living in the SGA's – it is important to plan for this now, as Oakville prepares for the forthcoming high density developments. There are also the transit and hydro corridors that could be used to safely link parks, with both pedestrian and bike access.

Creating an eco-park is a great idea for increasing the parkland available in the future. However, the focus must be on the imminent development of the SGA's and providing those residents with the green space they need. Creating a healthy, happy community should be the top priority and sufficient parkland is the key to achieving this. Driving 25 minutes north to an eco-park from Midtown is hardly eco-friendly!

The cash-in-lieu payments received thus far from developers, plus what is forecast to be received from current development proposals is a substantial amount, more than \$40 million thus far. It should be prioritized to purchase parcels of land in appropriate locations throughout the SGA's in order to provide the parks that will be required by the future residents.

What is required is a Parkland Acquisition Plan, especially relating to the imminent SGA developments. We are not willing to support any plan that does provide sufficient parkland for the benefit of the future residents of the SGA's. We need regular and ongoing participation to ensure the types and locations of parks are created in the best interests of residents. We need to withstand pressure from developers, who put profit before people. Allocation of cash in lieu for parkland acquisition should be a council decision, not delegated authority, and should be allocated to the local neighbourhood from which the cash in lieu was derived.

Thank you again for the opportunity to contribute to this vital plan, the aim of which should be to make Oakville more liveable, not more leaveable.

Yours sincerely,

Carolyn McMinn  
President  
Trafalgar Chartwell Residents' Association

cc: Members of Council  
CAO Clohec  
Commissioners Bell and Garbe

## *Other Public Comments*

It seems as though the mayor is favouring a large purchase of land in an area that is already protected instead of heat reducing swaths of land which the public can use adjacent to their residences? Haven't we learned anything from Covid. Parkland should be easily accessible and not require a vehicle to get to. He is however correct in asking developers to open their books. Too many of them are more than willing to spend millions on edifices glorifying their names rather than really contributing to the community - think social housing. Then they could truly contribute to a liveable community for more than the privileged elite.

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Oakville has been considered a desirable place to live partly based on the green space it offers in many neighborhood's. New developments should be required to keep with the culture of Oakville and provide natural surroundings including green space walking trails and trees to provide shade on hot summer days, beauty and oxygen. After the long isolation of COVID this should be a given that parks are essential to people and necessary to physical and mental health. I would also argue that every new neighborhood should also contain garden plots to allow new residents to grow their own food.