



November 24, 2023

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

Dear Gabe:

Subject: **Parks & Open Space Strategy
Parks Plan 2031 (updated November 2023)**

Thank you for the opportunity to comment on the updated [Parks Plan 2031 \(updated Nov 2023\)](#). It is understood that the Town of Oakville has re-opened and amended the Parks & Open Space Strategy with its consultants with the intent of addressing concerns raised by the appeal to the OLT of the previous by-law and plan that passed in September 2022, with the intention of passing a new by-law and plan for early Q1 of 2024.

The Board is re-submitting its comments from its previous circulation in July 2022 as well as additional comments resulting from the most recent circulation as it pertains to existing and planned school board facilities. The Board looks forward to further discussions on our comments and looks forward to further assisting the Town and the consultant as the Parks & Open Space Strategy progresses.

Town of Oakville Parks Plan 2031 (November 2023 draft)

The Board has reviewed the report and advises that its comments from the July 2022 letter still apply, where the Board would like some additional clarity on its role of being part of the overall open space networks for the Town of Oakville. Further to the comments, the Board provides the following additional comments:

1. The Board is supportive of any future collaboration and co-ordination, where possible, with the Town and other agencies in the development of its school sites, to maximize efficiency in providing quality open spaces for students and the community alike. The Board develops a [Long Term Accommodation Plan \(LTAP\)](#) updated on an annual basis. The document provides long range school projections and maintains a list of proposed Capital Projects which includes new school construction.
2. Section 4.10 continues to outline the exemption of certain categories of land use from the requirement to provide parkland dedications. The section refers to Appendix IX which reviews a

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number of parkland dedication exemptions in municipalities that are comparable in growth and funding pressures. In many parkland dedication by-laws, institutional uses such as schools are identified as exempt. The Board supports the identification of school boards to continue to be exempted from the parkland dedication requirement.

3. In consideration of Section 2.0 and Section 3.0 of Appendix IV of the Parks Plan, the Board would like to express its interest in further discussions with the Town of Oakville on coordinating how new school sites and parkland will be delivered within Town-identified Strategic Growth Areas such as Midtown Oakville and in other large-scale developments such as the IO/Argo lands located within the North Oakville East Secondary Plan.
4. In reviewing Appendix VI of the Parks Plan, the Board would like to see the scope of this review also include an analysis of development scenarios between parks and schools, and best practice strategies that could be explored in urban park environments.
5. In consideration of Appendix VIII of the Parks Plan, the Board is open to exploring different ownership and/or joint capital funding of school and park open spaces in urban park settings, especially where land is not as readily available.

Town of Oakville Draft Parkland Dedication By-law 2023

Further to Point 2 in the previous section, the Board continues to support exempting boards of education from parkland conveyances and/or payment-in-lieus when developing their sites, whether new or existing.

It is understood that although the previous park plan supported this approach, the council approved by-law in September 2022 did not include the exemption. We are therefore again taking the position that school boards should be exempt, as we were in previous by-laws, from parkland dedication requirements.

The addition of such expenses increases the already costly development of new schools and the lack of Ministry or Board funding sources to bridge the gap. This may preclude the feasibility of redeveloping existing school sites, the construction of additions, and/or the undertaking major renovations to existing facilities due to the additional costs. Note that the Board would not be in support of an iteration of the 2023 Parkland Dedication By-law that does not exempt school boards.

The Board would also like to take this opportunity to note that it is a contributor in enhancing the Town's open space inventory and community use facilities through our reciprocal use agreement with the Town which allows open access to the community to its school sites. This is acknowledged in the Parks Plan 2031 which supports these types of use agreements. As such we argue that we already contribute in kind through the open use of our sites, and should therefore not be subject to additional costs.

We thank you again for the opportunity to comment on the Town's Parks Plan and By-law, and look forward to ongoing discussions. Should you have any questions regarding our comments, please contact the undersigned.

Sincerely,



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Cc: C. Mark, Town of Oakville - Parks and Open Space
L. Choi, Halton District School Board
B. Vidovic, Halton Catholic District School Board
R. Merrick, Halton Catholic District School Board

December 15, 2023

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

Dear Gabe:

**RE: Town of Oakville Parks Plan 2031 (Updated) & Draft Parkland Dedication By-law
Town of Oakville**

Thank you for providing the Halton Catholic District School Board (HCDSB) with an opportunity to comment on the Oakville Parks Plan 2031, updated November 2023, and the draft Parkland Dedication By-law.

HCDSB previously provided comments on the Town of Oakville Parks Plan 2031. It is understood that the Town of Oakville Council endorsed the Parks Plan 2031, dated June 2022 and associated Parkland Dedication By-law in September 2022; however, the by-law was subsequently appealed to the Ontario Land Tribunal. Furthermore, it is understood that Bill 23, which received royal assent in November 2022, effects the overall strategy municipalities can employ to secure lands and cash-in-lieu for parkland.

As such, the updated Parks Plan 2031 and draft Parkland Dedication By-law have been updated in consideration of the new legislation.

Parks Plan 2031 (Updated November 2023)

1.2 Greenlands & Parks

HCDSB reiterates its comments on this section from August 2022 regarding the need for 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.

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.

Since August 2022, HCDSB has requested its first school site in one of the Town of Oakville's Strategic Growth Areas, namely the Midtown Oakville Urban Growth Area.

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. HCDSB will continually monitor student yields to ensure projections are accurate and that the school accommodation needs of the future can be met.

As 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.

HCDSB is generally supportive that the PC park type would be suitable for co-location with urban school sites as it may provide the maximum opportunity for creating partnerships and site space efficiencies. Further, HCDSB reiterates that it supports 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. HCDSB reiterates that based on past experience in the Town of Oakville (e.g. co-location of Holy Trinity Catholic Secondary School, River Oaks Community Centre, and River Oaks Park), the Community Park type in certain instances may be suitable to be co-located with a secondary school, where possible. 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. HCDSB reiterates its support of co-location of elementary and secondary schools 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).

HCDSB expresses interest in having discussions with the Town of Oakville regarding the delivery of co-location of schools with parks in Strategic Growth Areas. Furthermore, HCDSB reiterates that 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, HCDSB 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 43 states that the Town consider Board of Education, such as HCDSB, exempt or subject to a reduction from any parkland dedication/cash-in-lieu requirement. 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. HCDSB strongly supports exempting schools and school board uses from parkland dedication requirements.

General Comments

HCDSB reiterates the following 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 curriculum needs, especially when school sites are located adjacent to parkland and there is seamless access between both uses.
- HCDSB 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, HCDSB 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.
- HCDSB 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.

Draft Parkland Dedication By-law (2023-XXX)

It is understood that the previously approved Parkland Dedication By-law did not exempt school boards as-of-right from parkland dedication requirements. As stated previously, school board facilities play an important role in providing open space and recreational opportunities for the local community after school hours through shared use agreements. As school boards already add to the Town's open space and recreational space inventory outside of the Town-owned properties, it should not be subject to parkland requirements. Furthermore, the placement of additional financial requirements on school board projects may result in challenges to project delivery.

Section 2.1 of the new draft Parkland Dedication By-law provides an exemption for school boards from parkland dedication requirements for lands owned and used for the purposes of a Board of Education. HCDSB strongly supports the exemption of school board uses from parkland dedication requirements provided in the new Parkland Dedication By-law. HCDSB however requests that the wording be revised to exempt situations where school boards would use space in buildings where the land is not owned by school boards (e.g. podium schools where space in a mixed-use building may be owned or leased by a school board). As such we would support a revision to Section 2.1 to provide the exemption for land that is owned "and/or" used for the purposes of a board of education.

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

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

Yours truly,



Dhilan Gunasekara
Manager, Planning Services

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