



PARKS AND RECREATION ONTARIO

## Proposal Response:

Review of proposed policies for a new provincial planning policy  
instrument

ERO #: 019-8462

Parks and Recreation Ontario Submission  
May 10, 2024

Parks and Recreation Ontario  
1 Concorde Gate, Suite 30  
Toronto, ON M3C 3N6  
[prontario.org](http://prontario.org)



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## About Parks and Recreation Ontario

Parks and Recreation Ontario (PRO) is a non-profit association with over 6,500 members that delivers services to more than 85% of Ontario's population. We are devoted to advancing equitable access to quality parks and recreation services for all Ontarians. PRO champions the health, social, and environmental benefits of parks and recreation through evidence-based practices, advocacy, and collaborative cross-sectoral partnerships. Our work includes policy and research, education, training, and professional development opportunities, as well as our flagship quality standards program, HIGH FIVE®. We envision a future for Ontario where every person has equitable access to vibrant communities, sustainable environments, and personal health.

## Introduction

PRO appreciates the opportunity to provide commentary and recommendations on the *Review of proposed policies for a new provincial planning policy instrument* (ERO #019-8462). The *Proposed Provincial Planning Statement, 2024* (PPS 2024) is comprehensive and provides a wide breadth of policy direction on interrelated disciplines that shape and are impacted by planning and development.

While we appreciate the clarity that this detailed framework provides to streamline provincial planning processes, we request further information relating to the integration of municipal and school board infrastructure. Additionally, we advise that this policy tool highlights the role that parkland plays in climate change mitigation. Although we support requirements to undertake early engagement with Indigenous communities on land use planning matters, the success of such requirements hinge on the Ministry providing adequate funding to municipalities to support costs associated with engagement and relevant training. Additionally, we suggest that the Ministry conduct its own engagement process to determine capacity-enhancing funds and resources that Indigenous communities and organizations will require when fielding an influx of engagement requests. Finally, we recommend that language within PPS 2024 highlights the importance of equitable distribution in relation to the planning and provisioning of parks and recreation.

## Recommendations

**Provide infrastructure to support development: Integrating municipal and school infrastructure.**

### Recommendation:

Facilitate connections between school boards and municipalities.

Education and recreation both play an integral role in supporting healthy development during childhood, and throughout the lifespan. Like parks and recreation spaces, schools serve as hubs that unite Ontario's

diverse communities. Given the common values shared between these sectors, PRO appreciates the Ministry's efforts to better integrate parks and recreation and school infrastructure.

PPS 2024 requires, "municipalities and school boards to integrate planning for schools with planning for growth and promote opportunities to locate schools near parks and open space." Currently, playgrounds, fields, and green space are already an integral part of school facility design. Therefore, the requirement of locating schools near open space prompts us to assume that future schools may be increasingly reliant on municipal park infrastructure. Since this is only an inference, we request further clarity and rationale for this proposed policy.

Schools across Ontario boast quality recreation and green spaces that are often available for broader community use. However, cumbersome processes and [increased rates](#) challenge our members when provisioning recreation services in school facilities. We understand that recreation facility rentals are not, and nor should be, a top priority of school boards. However, as municipalities across Ontario experience growth and expansion, the optimization of all available recreation and parks spaces is vitally important to the vitality of complete communities. Furthermore, if our assumptions are correct and schools become increasingly reliant on municipal parks and open spaces, it is only reasonable for municipalities to be equally supported in accessing school gymnasiums, fields, tracks, pools, and other recreation infrastructure. The Ministry can support improved liaising between municipalities and school boards by facilitating connections and establishing standardized and streamlined processes for municipal-school board engagement, especially as it relates to parks and recreation infrastructure.

Public parks and open spaces have the potential to enhance educational experiences across Ontario. Parks are an especially important resource to supporting Indigenous-led [land-based learning](#), as well as [nature-based and outdoor education](#). While we support multi-purpose use, school reliance on parks will result in municipalities experiencing further challenges in sustainably funding playgrounds, trail systems, fields, and other parks and recreation projects. Therefore, potential school reliance on municipal parks and open spaces further underscores the necessity to repeal and replace the *More Homes Built Faster Act (2022)*.

### **Balance Housing with Resources: Mitigating Climate Change Impacts**

#### **Recommendation:**

Highlight the role of parkland, greenspace, and vegetation in climate change mitigation.

PRO acknowledges and commends the Ministry for addressing the responsibilities of planning authorities in reducing greenhouse gas emissions and preparing for the impacts of climate change. However, stipulations related to climate change policies appear reduced when compared with the *Provincial Policy Statement, 2020* (PPS 2020). Notably, PPS 2020 requires land use patterns within settlement areas to, "minimize negative impacts to air quality and climate change, and promote energy efficiency," and



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“prepare for the impacts of climate change” (p. 8). Both these stipulations were omitted from the *Proposed Provincial Planning Statement, 2023* (PPS 2023), and now PPS 2024. Furthermore, when compared to PPS 2020, the *Energy Conservation, Air Quality and Climate Change* section is significantly reduced. Particularly, PPS 2024 decreases emphasis on the effects of vegetation and green infrastructure in climate change mitigation and eliminates requirements to maximize vegetation within settlement areas, where feasible. The reduction and de-emphasis on vegetation and green infrastructure in PPS 2024 suggests a concerning trend in Provincial policy that devalues the role of parkland, vegetation, and greenspace in climate change mitigation.

Climate change mitigating policies are well aligned with long-term economic sustainability. In the face of extreme weather events, [parks and green space play a vital role in improving air quality, reducing air temperatures, and absorbing stormwater runoff](#). In other words, parks and greenspaces act as an economic and social safeguard against the impacts of climate change. Additionally, well planned and connected trail networks encourage low-emission transportation, like walking and biking, thereby [reducing greenhouse gas emissions](#).

While we support the climate change related policies of PPS 2024, these policies should also acknowledge and emphasize the role that parks play in climate change mitigation. Therefore, PRO requests that the Ministry reinstate stipulations from PPS 2020 that emphasize the positive effects of vegetation and green infrastructure, as well as requirements to maximize vegetation in settlement areas, where feasible. Furthermore, PRO recommends that PPS 2024 include an explicit statement about parkland in relation to climate change mitigation planning.

### Implementation: Indigenous Engagement Processes

#### Recommendation:

Provide funds and resources to carry out Indigenous engagement processes.

PRO recognizes and applauds the Ministry for prioritizing Indigenous engagement throughout PPS 2024. When compared with PPS 2020, the Ministry has included stronger language that emphasizes early engagement and ensures the consideration of Indigenous interests throughout municipal planning processes. Echoing commentary from municipalities and Indigenous communities in response to PPS 2023 (ERO #019-6813), PRO fully supports requirements for municipalities to undertake early and thorough engagement with Indigenous communities. However, the successful implementation of this policy hinges on the Ministry providing adequate training, funding, and capacity-building resources to both municipalities and Indigenous communities who will be involved in these engagements.

Meaningful Indigenous engagement is an ongoing relationship building process that must be a continual priority for municipalities. Therefore, PRO recommends that the Ministry allocate province-wide funding

for municipal-Indigenous engagement. Establishing this budgetary line will demonstrate the Ministry's commitment to Indigenous engagement and ensure that Indigenous communities and organizations are adequately compensated for their feedback and input in planning processes.

Municipal staff across Ontario vary in degrees of experience with Indigenous engagement. [Effective Indigenous engagement](#) requires astute cross-cultural communication skills, knowledge of Indigenous histories and cultures, and nuanced understandings of local knowledge and politics. Therefore, in addition to funding for engagement processes, we also recommend that the Ministry provide Indigenous engagement training and/or funding for training to municipalities.

Finally, while we support increased engagement requirements, we also acknowledge that this policy may place additional workloads that exceed current capacities of Indigenous communities and organizations. Therefore, we recommend that the Ministry conduct its own engagement process to determine the funds and resources that Indigenous communities and organizations require when fielding an influx of municipal engagement requests.

#### **Public Spaces, Recreation, Parks, Trails, and Open Spaces: Recommendations on Language**

##### **Recommendation:**

Reinstate PPS 2020 language related to 'equitable distribution.'

PRO recognizes and commends the Ministry for emphasizing healthy, active, and inclusive communities throughout the *Public Spaces, Recreation, Parks, Trails and Open Space* section of PPS 2024 (p. 20). Parks are intrinsically important to the vast majority of citizens; they are our collective backyard, offering visual relief, environmental value, and a staggering array of recreational opportunities.

For these reasons, it is vitally important that equitable access and distribution to public spaces, recreation, parks, trails, and open space is prioritized and emphasized throughout planning policies. Therefore, PRO recommends that the Ministry reinstate language from PPS 2020 related to equitable distribution. PPS 2020 states, "Healthy, active communities should be promoted by...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" (p. 17). PPS 2024 omits language around equitable distribution and instead references the need to plan and provide for, "persons of all ages and abilities" (p. 20). While PRO fully supports age and ability considerations in the planning and provisioning of parks and recreation, this language fails to acknowledge the need for equitable distribution, particularly in low-income communities.

Parks are crucially important in vulnerable neighbourhoods that include those living on low income, racialized groups, older adults, and children. Evidence suggests that the [health benefits of green space are](#)



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[more pronounced for lower socioeconomic groups and other vulnerable groups](#). Children benefit considerably from well-maintained parks with playgrounds close to where they live. Even modest increases in nearby green space density have been shown to improve health in vulnerable populations. Therefore, PRO recommends that language related to equitable distribution is reinstated in PPS 2024.

## Conclusion

Ontario has a multi-billion-dollar parks and recreation sector that support economic sustainability and healthy, active lifestyles for everyone from young children to seniors in every community across the province. High quality, accessible parks and recreation opportunities are integral to a well-functioning society; all people and communities deserve equitable access to these experiences. Provided for the benefit of both individuals and communities, recreation is a public good, in the same way as education or healthcare.

Quality recreation services need to be a part of municipal planning processes, supported by policies at all levels of government. As a strong and diverse provincial association, Parks and Recreation Ontario is well-positioned to represent the interests of parks and recreation professionals across the province and collaborate with the Ministry to ensure that all Ontarians can enjoy quality parks and recreation experiences.

We are pleased to discuss our comments further with the Ministry, should any clarity be required. Thank you for the opportunity to provide comments on this important proposal.

Sincerely,

A handwritten signature in black ink that reads 'S. Ane'.

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Sarah Ane  
Director of Policy and Partnerships  
Parks and Recreation Ontario  
[sane@prontario.org](mailto:sane@prontario.org)  
289-241-4325

A handwritten signature in brown ink that reads 'Kim Gavine'.

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Kim Gavine  
Chief Executive Officer  
Parks and Recreation Ontario  
[kgavine@prontario.org](mailto:kgavine@prontario.org)  
905-717-8354