
May 13, 2026

Province of Ontario – Ministry of Municipal Affairs and Housing

**Re: Proposed Changes to Support Standardizing of Parkland Requirements Under the Planning Act
ERO 026-0312**

Thank you for the opportunity to review and comment on the Environmental Registry of Ontario (ERO) posting 026-0312, seeking feedback on a Minister's regulation under the *Planning Act* to standardize parkland dedication requirements in Ontario in respect of the conveyance of developer-identified parkland, including encumbered lands and privately owned public spaces (POPS) arrangements, to implement Bill 23 provisions.

The Simcoe County District School Board (SCDSB) generally has no objection to the proposed regulation and understands that the intent is to facilitate a broader range of parkland types qualifying for municipal parkland dedication requirements. The identification and siting of municipal parkland is of great importance to the board. The SCDSB advocates for policy at the local level that encourages the co-location of schools with municipal parkland, as is consistent with policy 3.1.4 of the Provincial Planning Statement, 2024, in order to capitalize on land use efficiencies. Co-locating schools with municipal parkland helps the board distribute traffic across a wider geographical area by providing multiple drop off and pick up locations, such as at nearby park parking lots and on-street lay-by lanes, other than directly on the school site. This helps mitigate traffic impacts around school sites and encourages families who do drive to school to use active transportation for the "last mile". Co-locating schools with municipal parkland also provides opportunities for shared parking arrangements, meaning less of the school site needs to be dedicated to the exclusive storage of cars and can instead be used for educational and play space for students. As the size of new schools continue to trend smaller, particularly in urban areas, while enrolment generally increases, the board has to do more with smaller amounts of land while still providing a suitable school building, appropriate on-site parking and bus and private vehicle pickup/drop off facilities, suitable outdoor open field and play areas, and space for future growth in terms of additions and/or portable classrooms. Supportive co-location policies and practices ensure the board is able to use school sites in an efficient manner. Co-locating schools with municipal parkland even sometimes facilitates the provision of better play facilities and park amenities than could be provided without coordination, as combining financial and land resources can allow for additional or specialized facilities that can be shared by the school and municipality. Capitalizing on these opportunities ensures that there are high quality, age-appropriate play facilities and amenities available for children in the community. This is particularly important in urban areas where land is at a premium. The SCDSB is concerned that encumbered parkland and POPS may not be able to provide the same synergies and usability as it relates to adjacent or nearby school sites as more standard unencumbered parkland would – the ERO posting itself

even notes as a potential impact on the environment that, “unencumbered fee simple lands that may otherwise have been conveyed may not be conveyed under the proposed changes.” Therefore, the board recommends that the land suitability criteria be modified to reference that parkland must be provided in accordance with the Parks and Recreation Master Plan (or similar document) where one exists and where it provides direction for a particular development and/or area. Suggested language for the additional requirement under criterion 2. Land Accessibility/Comfort for Use is, “consistent with the required park type and facility(ies) outlined in the Parks and Recreation Master Plan, where applicable.” This would ensure that provided parkland is in alignment with community needs determined through park planning processes and facilitates continued school board and municipal cooperation to co-locate schools with suitable and usable parkland as part of developing complete communities.

More generally related to the provision of parkland, the SCDSB continues to advocate for provincial policy or legislation that exempts school boards from municipal parkland dedication requirements for both new builds and additions. Current parkland dedication requirements are inconsistent across the 16 municipalities and two separated cities in Simcoe County, with some exempting the school board from parkland dedication and others not. A school site identified within a plan of subdivision would typically have had parkland dedication paid as part of the planning approval process, which occurs prior to school board ownership. Existing school sites that have not paid parkland dedication were typically created by a local municipality and dedicated to school boards upon creation of school board legislation. Thus, the redevelopment of any school site for the purposes of schools should not be subject to parkland dedication. As schools provide an important source of green space and programmed outdoor space for the community, including sharing large field activities such as ball diamonds, soccer pitches, and running tracks, all which make efficient use of available land resources and public funds, it is the board’s position that schools should be exempt from parkland dedication. Additionally, school spaces and facilities are often available for public use through a permit system and therefore serve a similar function as parkland and other recreational facilities in the municipality.


SCDSB planning staff note that schools have experienced significant pressures to be used as urban green space as parkland dedication rates have been reduced and appropriate green space provision for residents has not kept pace. This creates challenges for operations and maintenance staff at schools as informal after-school hour usage increases, but funding for operations and maintenance does not take this additional use into account. The current parkland dedication calculation is based on the amount of land proposed for development; SCDSB planning staff respectfully posit that the parkland dedication calculation should be based on the density factor of the proposed development (i.e. density of units or people per hectare), as this would ensure that parkland is provided relative to the number of residents that will require it.

With the Province’s stated goal to construct 1.5 million new homes by 2031 comes the need to ensure public service facilities, such as schools, are sufficient to meet the needs of the residents of these new homes. The Simcoe County District School Board is understanding of the government’s proposals to facilitate the provision of alternative parkland types but emphasizes the importance of providing appropriate and usable parkland and park facilities, particularly as areas urbanize and densify and residents become more reliant on municipal parkland for recreation and relaxation purposes. Ensuring the right park types and right park amenities are

provided where they are needed, in conjunction with public service facilities like schools, facilitates the development of complete communities and maximizes the efficient use of land and resources.

Should you require additional information, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Bartmann". The signature is written in a cursive style with a large, sweeping initial "K".

Kristen Bartmann, MPLAN
Planner
Simcoe County District School Board

Cc:

Ministry of Education, Government of Ontario
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Simcoe County District School Board
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