



Ontario Association of  
**Landscape Architects**

A component organization of the  
Canadian Society of Landscape Architects

April 20, 2020

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay St., 17th Floor  
Toronto, ON  
M5G 2E5

Dear Minister Clark,

**Re: Landscape architects still concerned about proposed regulatory changes pertaining to the community benefits authority under the Planning Act, the Development Charges Act and the Building Code Act**

## **WE UNDERSTAND THE ISSUE**

I am writing today on behalf of the 2,000 members of the Ontario Association of Landscape Architects (OALA).

We have been a proud association since 1968, speaking out on issues to protect the public realm and achieve healthy, liveable and resilient communities.

We bring a unique perspective with the majority of our members working directly for and with municipalities across the province.

## **PROGRESS IS BEING MADE**

We are pleased that in the proposal released on February 28, 2020, ERO 019-1406, several positive changes have been made that reflect this association's previous comments.

These changes include bringing park development back into the DC eligible category, and going further to remove the 10% mandatory deduction.

This is consistent with the principle that "growth pays for growth" for park development in this province.

We thank the province for listening to our concerns, and responding with these changes.

Promoting, improving and advancing the profession of landscape architecture and maintaining standards of professional practice and conduct consistent with the need to serve and to protect the public interest.

## LARGE CONCERNS REMAIN

**There are, however, still areas of concern related to the proposed legislation, which threatens to reduce the amount and quality of the public realm.**

In particular, the regulations regarding the acquisition of parkland have the potential to reduce the amount and quality of public space in urban growth areas within the urban boundary and in city core areas experiencing density intensification.

The provision of a well-designed public realm is a key ingredient of successful municipalities – a place where people want to live and raise their families, which in turn attracts businesses to invest.

Three of our specific concerns deal with the parkland acquisition proposal captured in the Community Benefits Charge mechanism:

- The **limiting of collection of funds for parkland acquisition to 2% or 5%**, through the removal of the density calculation, will result in a net reduction of parkland in the province.
- The **removal of the ability of municipalities to compel developers** to dedicate lands, rather than contributions of cash in lieu, will create parkland deficient areas
- Municipalities need more than 12 months to implement a Park Masterplan, as required by the legislation. This type of planning requires robust analysis and public consultation. As landscape architects are experts in park planning matters, this is of particular concern to OALA members, to have sufficient time to complete these studies.

Parkland deficiencies are a risk, particularly where land values are so high that municipalities cannot reasonably purchase lands themselves for the purposes of parkland, or areas where lands are in such high demand that it may force municipalities to explore expropriation as a mechanism to acquire lands.

## COVID – 19 RESPONSE

The need for public open space and parkland in Ontario has never been clearer than in recent weeks. The COVID-19 pandemic has demonstrated how valued parkland and open space networks can contribute to healthy citizens – while Ontarians are restricted to their homes, they need a safe way to exercise for mental health benefits and stress relief.



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Sufficient parkland, where safe distances can be achieved, contributes to the health and well-being of Ontarians.

While density increases across the province, per Provincial Policy, the preservation of sufficient open spaces is vital to keep Ontario as a desirable place to live, work and invest.

As the profession that has expertise in the creation of those important public spaces, we are advocating for the preservation of the mechanisms to secure and develop them. We are deeply concerned that the character of the neighbourhoods created post Bill 108 will differ dramatically from those created with legislation that provides for dedication of parkland.

### **REQUEST FOR TELECONFERENCE CALL**

We will be actively asking our members to write and call their individual MPPs to express their concern about this legislation.

We would appreciate the opportunity to discuss with you at your earliest convenience on this important file.

Yours truly,  
ONTARIO ASSOCIATION OF LANDSCAPE ARCHITECTS

A handwritten signature in black ink, appearing to read 'Doris Chee', is written over a light blue horizontal line.

Doris Chee, OALA, CSLA  
OALA Past President

cc: OALA Council