
Proposal Response:

Uxbridge Urban Provincial Park Preliminary Management Plan

ERO #: 019-9209

Parks and Recreation Ontario Submission
January 26, 2025

About Parks and Recreation Ontario

Parks and Recreation Ontario (PRO) is a non-profit association with over 7,000 members that deliver 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, research, education, training, professional development opportunities, and our flagship quality standards program, HIGH FIVE®, which includes a stream called the *Principles of Healthy Child Development*. We envision a future for Ontario where every person has equitable access to vibrant communities, sustainable environments, and personal health.

Introduction

We are writing to express our support for the Uxbridge Urban Provincial Park Preliminary Management Plan. Located less than 30km from the Greater-Toronto-Area, this park provides our growing province with much needed space for active living, connection with nature, and education about Ontario's cultural heritage.

We would like to express our gratitude to the Ministry of Environment, Conservation and Parks, and all others involved, for the development of the Uxbridge Urban Provincial Park Preliminary Management Plan. As a result of this plan, more Ontarians will be able to gain the benefits of outdoor recreation.

Acknowledgement & Recommendations

PRO commends the Ministry for prioritizing ecological integrity, accessibility, and Indigenous engagement throughout the Uxbridge Urban Provincial Park Preliminary Management Plan. These priorities strongly align with PRO's mandate of advocating for equitable access to parks and recreation for all Ontarians. While we are largely in support of the plan, PRO seeks further clarity on Uxbridge Urban Provincial Park's accessibility strategy, and the 'Urban Provincial Park' classification. Additionally, the opening of this new park presents an important opportunity for Ontario Parks to re-examine employee accreditation requirements, particularly for those who interact with children and youth. The following document provides additional considerations pertaining to the Uxbridge Urban Provincial Park Preliminary Management Plan.

Publicly Share Park Accessibility Strategy

Recommendation:

Develop and publicly share an accessibility strategy that will be adhered to in the design and operation of Uxbridge Urban Provincial Park.

Outdoor recreation improves the health and well-being of all Ontarians. However, not all Ontarians share equitable access to outdoor recreation. [6 in 10 Canadians with disabilities encounter barriers](#) when accessing indoor and outdoor public spaces. When Ontarians are unable to access outdoor spaces, [their health suffers](#). That is why PRO applauds the Ministry for prioritizing accessibility in the Uxbridge Urban Provincial Park Management Plan.

The vision of Uxbridge Urban Provincial Park includes, "*permanently protecting an area that is an inclusive space and accessible to all.*" While the document makes several references to accessibility, it lacks a clear plan for how this vision will be achieved.

PRO acknowledges that a detailed accessibility strategy is likely beyond the scope of this preliminary document. Therefore, we look forward to seeing an accessibility strategy developed in collaboration with key stakeholders – most importantly, Ontarians living with disabilities. This accessibility strategy should include, but not be limited to:

- Details about compliance and exceedance of *Accessibility for Ontarians with Disabilities Act* (AODA).
 - AODA offers a satisfactory starting point for identifying, removing, and preventing barriers of access to public spaces. However, PRO believes that the opening of the first Urban Provincial Park presents unique opportunity to exceed these standards. Using the [Improving Accessible Built Environment Standards – 2023 Initial Recommendations Report](#) as a starting point, Uxbridge Urban Provincial Park has an opportunity to lead Ontario into the future of accessible built environments.

Developing and publicly sharing an accessibility strategy for Uxbridge Urban Provincial Park would support the Province in fulfilling the promise of *Ontario's Accessibility Action Plan*, including the vision for a fully accessible Ontario by 2025.

Develop Urban Provincial Park Classification

Recommendation:

Develop a new 'Urban Provincial Park' classification under the *Provincial Parks and Conservation Reserves Act, 2006*, that provides clear differentiation from other park classifications.

For over 100 years, Ontario's Provincial Parks and Conservation Reserves have provided Ontarians and out-of-province visitors with access to quality outdoor recreation experiences. The establishment of Uxbridge Urban Provincial Park continues this legacy, protecting ecologically sensitive areas, offering visitors opportunities for learning and environmentally responsible recreation, and providing rich settings for academic research and citizen science.

We acknowledge that a new classification of park is currently being proposed under the *Provincial Parks and Conservation Reserves Act, 2006*. Therefore, we look forward to further clarification on how *Urban* Provincial Parks will differ in management and operation from other recreation class parks in and around urban areas. We request the Ministry provide a definition for 'Urban Provincial Parks' that address the following questions:

- How will the classification of 'Urban' effect the management and operation of Uxbridge Urban Provincial Park?
- How will Urban Provincial Parks better meet the needs of an urban population, when compared to other Provincial Parks and Conservation Reserves?
- How will Urban Provincial Parks serve urban Indigenous populations?
- What is the plan for integrating Uxbridge Urban Provincial Park with other urban community services (e.g., public transit, community group use, child and youth programming, older adult programming, etc.)?

Establishing clear definitions and priorities will cement the relevance and importance of Urban Provincial Parks among other park classifications. Developing an Urban Provincial Park classification will ensure management and operational plans better meet the needs of intended visitor groups, especially urban populations.



Implementation of childhood development training

Recommendation:

Require specialized training in healthy child development for Ontario Parks staff who lead programming for children and youth.

As a provincial institution, Ontario Parks has an obligation to uphold the highest standard of training amongst employees. The opening of Uxbridge Urban Provincial Park will increase the programming capacity potential for Ontario Parks, especially close to the GTA. This presents an exciting opportunity for the Ministry to revisit employment accreditation requirements and pilot new training, particularly among employees who lead child and youth programming.

For decades, Ontario Parks has enhanced the benefits of spending time in nature by delivering educational programming, such as [Discovery Programs](#), that directly link nature-based learning to Ontario school curricula. However, recent [job postings](#) indicate that training in healthy child development is not a requirement for employees delivering these programs.

Many municipalities, universities, and organizations across Canada that run child and youth programming require staff to attain the [HIGH FIVE®](#) certification in [Principles of Health Child Development](#). For over two decades, HIGH FIVE has been the champion of quality assurance, ensuring that organizations meet the highest standards of excellence. [Principles of Healthy Child Development](#) is rooted in extensive research and hands-on experience, providing participants with essential learnings about designing, delivering, and evaluating quality programming.


The opening of Ontario's first Urban Provincial Park brings new possibilities and increased programming capacity for Ontario Parks. To support Ontario Parks during this time of transformation, PRO would be pleased to openly dialogue and collaborate with the Ministry regarding the inclusion of the [HIGH FIVE® Principles of Health Child Development](#) course as part of training for Naturalists, Discovery Rangers, and other Ontario Park's staff involved in creating and delivering programming for children and youth.

Conclusion

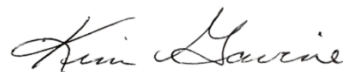
High quality, accessible outdoor recreation opportunities are integral to the health and well-being of all Ontarians. Provided for the benefit of both individuals and communities, parks and recreation are a public good, in the same way as education or healthcare. Quality parks and recreation services need to be available to all Ontarians, sustainable and supported at all levels of government. The long-term sustainability of parks and outdoor recreation are only made possible through prioritizing accessibility, ecological integrity, and environmental management practices informed by Traditional Indigenous Knowledges. For this reason, we applaud the Ministry for the Uxbridge Urban Provincial Park Preliminary Management Plan. We especially commend the Ministry for prioritizing accessibility and inclusion, ecological integrity, and Indigenous engagement throughout the proposal. We encourage that these priorities continue to be a central focus as the management plan is further developed.

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,



Sarah Ane
Director of Policy and Partnerships
Parks and Recreation Ontario
sane@prontario.org
289-241-4325



Kim Gavine
Chief Executive Officer
Parks and Recreation Ontario
kgavine@prontario.org
905-717-8354