



Ontario Public Health Association
 l'Association pour la santé publique de l'Ontario
 Established/Établi 1949

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

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Ontario Growth Secretariat
 C/O Charles O'Hara
 Director, Growth Planning and Analysis Branch
 Ministry of Municipal Affairs
 College Park 23rd Floor
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President
 Karen Ellis-Scharfenberg
 E-mail: president@opha.on.ca

Dear Charles O'Hara,

Executive Director
 Pegeen Walsh
 E-mail: PWalsh@opha.on.ca

Re: Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017 (2019)

Constituent Societies

- Alliance for Healthier Communities
- Association of Public Health Epidemiologists in Ontario (APHEO)
- Association of Supervisors of Public Health Inspectors of Ontario (ASPHIO)
- Canadian Institute of Public Health Inspectors (Ontario Branch) (CIPHIO)
- Community Health Nurses' Initiatives Group (RNAO)
- Health Promotion Ontario (HPO)
- Ontario Association of Public Health Dentistry (OAPHD)
- Ontario Association of Public Health Nursing Leaders, (OAPHNL)
- Ontario Dietitians in Public Health (ODPH)
- Ontario Society of Physical Activity Promoters in Public Health (OSPAPPH)

The Ontario Public Health Association (OPHA) appreciates the opportunity to provide comments on the Proposed Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017* (the Growth Plan). OPHA is a member-based, non-profit, non-partisan organization, which has been providing an independent voice for public health for 70 years. We bring together a broad spectrum of individuals and groups from various backgrounds and sectors, all of whom are committed to promoting the health and wellbeing of Ontarians.

There is increasing evidence that healthy and complete communities, which are communities that are compact, pedestrian-friendly, transit-supportive, and conducive to a variety of uses, positively impact population health and health equity. Research indicates that low-density and automobile-dependent communities adversely affect the health of residents. For example, such communities can be associated with increased rates of obesity, diabetes, cardiovascular diseases, respiratory illnesses and increased exposure to environmental contaminants.

OPHA supports the guiding principles of the Growth Plan, especially the principles which contribute to health such as: the promotion of complete communities that are designed to support healthy and active living; intensification and higher densities to support transit and service viability; and protection of the environment. The Growth Plan is an important and valuable tool that OPHA members rely on when working with regions, counties, cities, and towns to develop local policies in support of healthy, complete communities.

OPHA is committed to advocating for a comprehensive and health-promoting Growth Plan, and as such, has been participating in written and in-person consultations regarding the Growth Plan since 2015. Recently, OPHA was invited to provide comments in-person at the *Growth Plan for the Greater Golden Horseshoe*

Charitable Registration
 Number 11924 8771 RR0001

Stakeholder Forum on November 8th, 2018 and at the *Stakeholder Exchange on the Proposed Changes to the Growth Plan* on February 11th, 2019.

OPHA supports Proposed Amendment 1 to increase flexibility and reflect the realities of various local contexts. However, it is critical that local-level policies encourage and contribute to the most healthy, complete, climate-resilient communities possible for each context (e.g., compact, pedestrian-friendly, transit-supportive, and conducive to a variety of uses.) This would require the establishment of clear criteria and performance measure indicators to evaluate implementation and impact of the Growth Plan and the Proposed Amendment 1 with respect to topics such as density, affordable housing, and land use mix. Below, we are pleased to offer a summary of our recommendations regarding Proposed Amendment 1. Please find more detailed comments regarding each recommendation in Appendix A.

Our recommendations are based on the following central guiding principle of the Growth Plan: ***Proposed amendments shouldn't compromise the vision to build healthy, complete communities.***

OPHA urges your government to consider the following recommendations:

- **Intensification Targets and Designated Greenfield Area Density Targets**
 - Maintain minimum densities above 50 people and jobs per hectare to support transit, walkability, and mixed-use development.
- **Employment Planning**
 - Support the development of an Economic Strategy for the Greater Golden Horseshoe as employment areas may be part of an overall strategy for employment for the region and municipalities.
- **Settlement Area Boundary Adjustments**
 - To protect the natural environment, limit expansion of settlement area boundaries within white belt, greenbelt, natural heritage, or agricultural systems if there is an opportunity to intensify in already established boundaries.
 - Avoid lessening the requirements for large settlement area boundary expansions as this may discourage intensification; intensification helps promote more active lifestyle.
 - Provide more clarity about the amendment to allow municipalities to do boundary expansions of 40 hectares without an Official Plan review. For smaller municipalities 40 hectares represents a significant portion of land which could potentially hold 200-300 new homes, a large development for some communities.
- **Major Transit Station Areas**
 - Retain existing density targets, expanding the potential ratio of major transit station areas, and expediting designation processes to support transit.
 - Consider clarifying the conditions/definitions under “Major Trip Generators” such that it is not used to enable lower density with unrealistic trip generation to support transit sustainability.

OPHA would welcome any further opportunities to be involved in this review and follow-up processes. We value being able to collaborate with your ministry to advance our shared interest in creating healthy, livable, complete and climate-resilient communities. OPHA, through its Build Environment Working Group will be

contacting your branch to set up a meeting to discuss how we may assist your ministry in achieving healthy and complete communities in the Greater Golden Horseshoe.

Thank you for your consideration,

Sincerely,



Pegeen Walsh
Executive Director, OPHA

More about the Ontario Public Health Association

We are a member-based charity that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including promoting public dialogue and education on healthy public policy, capacity building, research and knowledge exchange. Our membership brings together many different disciplines and sectors working together to achieve our shared vision of optimal health for all.

Appendix A - Detailed Comments Around Recommendations Re: Proposed Amendment 1 by Section

	Comments
Section 1 - Introduction	
1.1 – The Greater Golden Horseshoe	A definition of “unmanaged growth” needs to be included in the definition section to better understand the context of replacing “low-density urban sprawl” with “unmanaged growth.”
1.2 – The Growth Plan for the Greater Golden Horseshoe	<p>Consider re-inclusion of social equity with the Vision. As noted in section 2.2.1, social equity is an important element in complete communities where people live, work and play.</p> <p>In third last paragraph of Section 1.2. consider removing “in larger urban centers” and adding a revision that would indicate that all communities need to grow at transit-supportive densities appropriate for the local context and transit service being contemplated, rather than just those in larger urban centers.</p>
1.2.1 – Guiding Principles	<p>Consider re-inclusion of the term <i>low-carbon communities</i> in the guiding principles. Low-carbon communities not only help address climate change but also improve local air quality. According to a 2017 Health Canada report, air pollution contributes to over 14,400 premature deaths annually in Canada, and a significant portion of this comes from traffic related air pollution. The Ontario Government’s Environment Plan acknowledges the private sector’s capacity to “<i>transition to a low-carbon economy</i>” and commits to working with municipalities to “<i>support building climate resilience and transformation to the low-carbon future.</i>”</p> <p>A definition of environmentally sustainable communities needs to be included in the definition section in order to provide proper context for the proposed guiding principle edits.</p> <p>The amendment is proposing use of environmental sustainability instead of climate change, “low-carbon”, or green infrastructure. The new terminology is vague and doesn’t make it clear on what is required to achieve environmental sustainability.</p>
Section 2 – Where and How to Grow	
2.1 - Context	<p>Proposed GHG reduction target (37% below 2005 levels by 2030) is substantially weaker compared to the previous target (37% below 1990 levels by 2030). There is no mention of the 2050 target which, as per the Intergovernmental Panel on Climate Change (IPCC), needs to be at least 80% lower by 2050.</p> <p>There is no mention of overall monitoring and reporting in terms of frequency and provincial accountability to meeting the new targets.</p> <p>OPHA would like to reiterate our comments from our January 28, 2019 submission on the government’s proposed Ontario Environment Plan. We urge the government to set stronger greenhouse gas reduction targets. Ontario can realize substantial co-benefits in terms of healthier communities, a growing economy and a healthier environment by setting a target that limits emissions to 112.9MT by 2030, rather than the 143 MT outlined in the Environment Plan.</p>
2.2.2 – Delineated	2.2.2.4 The reference to “size, location and capacity” is not adequate to ensure

Built-up Area	factors that could impact human health are taken into account. The existing policy considers how targets can be assessed, such as diversification of the total range and mix of housing options, and achievement of complete communities.
2.2.4 – Transit Corridors and Station Areas	2.2.4.4. Consider clarifying the details and conditions of a “major trip generator or feeder service”. It is important that this policy is not used to support lower densities under transit ridership forecasts that are not realistic and can, in the long term, undermine the financial sustainability of transit.
2.2.5 – Employment	2.2.5.8 This policy should prioritize the minimization or mitigation of adverse impacts on sensitive land uses, and not the other way around.
2.2.6 – Housing	<p>Reconsider the removal of requirements for a municipal housing strategy. Even if municipalities are still required to do this through other legislation, removing mention of a required housing strategy in the Growth Plan will water it down.</p> <p>Need clarification to define “market demand” and how that is to be balanced while ensuring housing supply meets local need through a full range and mix of housing types and tenures including affordable housing.</p> <p>With respect to rental housing supply, municipalities lack the necessary tools and resources to match demand with supply. The Province should consider introducing new tools, such as the ability to zone by tenure recently introduced in British Columbia, to assist municipalities in responding to market and local community needs</p>
2.2.7 – Designated Greenfield Areas	<p>2.2.7.3. Decreasing the intensification targets and minimum Designated Greenfield Area density targets for Group A (Hamilton, Peel, Waterloo and York), Group B (Barrie, Brantford, Guelph, Orillia, City of Peterborough, Durham, Halton, and Niagara) and Group C (Kawaratha Lakes, Brant, Dufferin, Haldimand, Northumberland, Peterborough County, Simcoe and Wellington) will mean that new development will be much less than what the Growth Plan was trying to achieve previously and could impact the ability of those communities to achieve healthier, more complete communities.</p> <p>2.2.7.3 It is unclear how to ensure that factors that could impact human health would be taken into account. The existing policy considers how targets can be assessed, such as achievement of complete communities and compact built form that supports active transportation.</p>
Section 4 – Protecting What is Valuable	
4.2.2 – Natural Heritage Systems	Provincial agricultural mapping and Natural Heritage mapping will not take effect until a municipality adopts these in a new OP. This will delay the incorporation of these maps to our local area. Also, municipalities have the ability to change the mapping at the local level.
Definitions	
Major Transit Station Areas	Support the expansion of the ratio for Major Transit Station Areas to include 800 meters. This is positive to support transit.
Other	
Remove any reference to climate change, “low-carbon”, or green infrastructure.	<p>Using environmental sustainability is a vague term; it isn’t clear on what is required to achieve environmental sustainability (i.e., how will it be measured?)</p> <p>The word “appropriate” should be removed with reference to low impact development. The inclusion of this word weakens the policy direction for the implementation of green infrastructure.</p> <p>Regarding Climate Change, consider defining the “other provincial plans and</p>

	<p>policies” that take the place of the Ontario Climate Change Strategy. It would be beneficial for these to be defined to provide clarity on the guidance municipalities can use to ensure a consistent approach in developing vulnerability risks assessments, assessment of climate change impacts, etc.</p>
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