



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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Association of Public Health  
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Association of Supervisors of  
Public Health Inspectors of  
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Canadian Institute of Public  
Health Inspectors (Ontario  
Branch)

Community Health Nurses'  
Initiatives Group (RNAO)

Health Promotion Ontario

Ontario Association of Public  
Health Dentistry

Ontario Society of Nutrition  
Professionals in Public Health

The Ontario Association of Public  
Health Nursing Leaders

*Charitable Registration  
Number 11924 8771 RR0001*

Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
777 Bay St, Suite 425 (4th Floor)  
Toronto, ON M5G 2E5

October 31, 2016

Dear Sir/Madame:

**Subject: Co-ordinated Land Use Planning Review: EBR Postings (Proposed Growth Plan for the Greater Golden Horseshoe, 2016. Notice #012-7194; Proposed Greenbelt Plan (2016). Notice #012-7195; Proposed Oak Ridges Moraine Conservation Plan (2016). Notice #012-7197; Proposed Niagara Escarpment Plan (2016). Notice #012-7228)**

The Ontario Public Health Association (OPHA) appreciates the opportunity to provide comments on the Province of Ontario's Co-ordinated Land Use Planning Review EBR Notices.

Created in 1949, OPHA is a not-for-profit organization committed to providing leadership on issues affecting the public's health and strengthening the impact of people who are active in public and community health throughout Ontario. Our mission is achieved by providing professional development, timely information and analysis on public health issues, access to multi-disciplinary networks, advocacy on healthy public policy and expertise and consultation.

There is increasing evidence that the way our communities are designed has a direct impact on factors such as: employment; social support networks; and the physical and social environments that influence health and health equity. Research indicates that poorly designed communities adversely affect the health of residents, as shown by increasing rates of obesity, diabetes, cardiovascular diseases, respiratory illnesses and exposures to environmental contaminants.

This was demonstrated, for example, by the findings from the 2014 report Improving Health by Design in the Greater Toronto Hamilton Area by the Medical Officers of Health for Peel Region, City of Toronto, Hamilton and Simcoe-Muskoka which showed that:

- The prevalence of diabetes among adults is projected to double in 25 years from 7.1% in 2002 to 16.4% by 2027. Current diabetes-related medical costs attributable to inactivity are over \$550 million in the GTHA each year.
- The annual costs of physical inactivity and obesity in the GTHA are now \$4 billion including \$1.4 billion in direct medical costs.
- Traffic-related emissions in the GTHA are estimated to be responsible for 854 premature
- deaths each year and 2,812 to 3,939 hospitalizations each year.

The OPHA supports public health-focused land use and design policies which create healthy, sustainable communities by recognizing the value of: protecting the natural environment (air, land, water), reducing community exposure to health hazards (e.g. transportation and point source emissions of pollutants, injuries), opportunities for increased physical activity and recreation; access to healthy food choices; social equity and cohesion; safety and security; and our aging and diverse population.

Public Health Units across Ontario are addressing the complex issues and impacts related to the built environment including: air quality, climate change, water quality, access to healthy foods, obesity, physical activity, traffic related injuries, falls and general wellbeing across all ages and throughout a lifetime. The goal to create healthy, livable communities through planning and growth policies aligns with the Ontario Ministry of Health and Long-Term Care's goal to improve public health through creating healthier built environments.

All four plans are supportive of concepts that are important to building healthy and complete communities. We were pleased to see that many of OPHA's comments submitted to your ministry as part of its 2015 consultations on land use planning were incorporated into these updated plans (i.e. net zero communities; climate change and resiliency; increased density; active transportation and transit systems; protected green space and natural heritage and agricultural systems; green infrastructure; and low impact development).

The OPHA's Health and Built Environment Workgroup has undertaken a review of the Co-ordinated Land Use Planning Review EBR Notices and has provided the comments below for your consideration. In addition to the review, OPHA's Workgroup Co-Chairs attended the technical briefing sessions held in Toronto and Clarington and other members attended the open house session held in Mississauga.

OPHA and members of its Health and Built Environment Workgroup welcome the opportunity to be part of this review and any follow-up processes. We would be pleased to discuss our submission further with you and provide additional information or clarification as needed. We would value collaborating with you and your colleagues to bring to the fore our recommendations which offer your ministry the opportunity to demonstrate leadership in creating healthy, livable, complete communities.

Thank you for your consideration and the opportunity to comment.

Sincerely,



Pegeen Walsh  
Executive Director

# Comments and Recommendations from The Ontario Public Health Association on Ontario's Co-ordinated Land Use Planning Review: EBR Postings

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By the Ontario Public Health Association

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## General Comments

### Climate Change:

- The proposed density and intensification target policies should incorporate both public-health and climate-change linkages to provide better support to municipal initiatives to improve health and climate change outcomes. Intensification contributes both to better health and climate change outcomes, which should be reflected in changes to the Plans. Connecting intensification and density targets to measurable health and climate outcomes would be a significant step forward for planning in Ontario. The Province should also consider both public-health and climate-change criteria, targets and metrics that support municipal initiatives to improve health and climate change outcomes.
- Broadly, the Plans work together to address climate change from both a mitigation and an adaptation perspective by promoting the development of complete, healthy, compact communities; integrating transportation and land use; protecting natural heritage, water and agricultural systems; and promoting a culture of conservation. Programming, and funding, for municipalities to support adaptation and improve resiliency of communities in areas of municipal responsibility would be helpful in realizing the objectives of the Plans. These commitments should be included in the Province's plan for adapting to climate change proposed to be released in 2017.
- Efforts to mitigate greenhouse gas emissions must expand to include all harmful emissions such as particulates, sulfur oxides and nitrogen oxides. Proposed changes to the Plans should consider mitigation of this entire spectrum of air pollutants, in addition to the traditional carbon-orientated approach to greenhouse gases.

### Housing:

- Investments by the Province in affordable housing, coordination of housing programs and funding mechanisms with all levels of government, and ensuring a wide variety of tools to address affordability issues, including housing supply considerations, are necessary. Proposed changes to the Plans are encouraging greater affordability and availability of a greater diversity of housing types and tenures by creating the conditions for higher-density housing supply. Further, potential changes through Bill 204 to introduce inclusionary zoning could encourage more affordable housing development.
- Consider policies that support apartment tower neighbourhood renewal and revitalization for the purposes of providing more affordable, quality housing in areas in the Greater Golden Horseshoe; and for creating complete communities in the apartment neighbourhoods. Findings in the report Tower Neighbourhood Renewal in the Greater Golden Horseshoe<sup>i</sup> prepared for the Growth Secretariat recommend that mixed use intensification of the often isolated apartment tower neighbourhoods can make these sites become connected, integrated, and complete communities.

## Equity:

- Incorporating transit affordability for people on a low income into provincial policies reduces inequities in access to employment and services. Consider allocating a portion of new funding for transit expansion to improving transit affordability for people on a low income.
- Age-Friendly Communities (AFC) need to be added in various areas throughout the plans as appropriate. For example, consider including AFC in sentences discussing “complete communities”, where possible, as AFC is a more comprehensive framework that includes concepts from complete communities, but also includes social and health aspects related to quality of life, especially for older adults.
- (Definitions): Consider adding a definition of “Age-Friendly Communities” (AFC) to all four plans as this framework is not the same as “complete communities”. AFC is a framework from the World Health Organization that is also supported and promoted by the Public Health Agency of Canada and the Ontario Seniors’ Secretariat. Age-Friendly Communities is a more comprehensive framework that looks at the physical and social environment from the perspective of an older adult and recognizes the diverse needs of older adults. Age-Friendly Communities design environments that are inclusive and accessible to everyone (i.e. age and ability are not a barrier to living and thriving in a community) and promote active aging, aging in place, social inclusion, civic engagement, community support, physical activity, access to community and health services, and a range of affordable, accessible, and appropriate housing and transportation options for everyone.

## Cycling:

- Ensure planning for bicycle networks is coordinated across all four plans and within the Province. Regional and local municipalities, conservation authorities and other levels of government need to coordinate planning activities to ensure existing and planned infrastructure support bicycle networks and are efficient and well connected. A variety of cycling facilities and traffic calming measures are needed to encourage cyclists of all ages and abilities. Facilities should be context sensitive and work to create a comprehensive cycling network that meets both recreational and utilitarian needs. In order to increase cycling mode share and reduce injuries, dedicated and separated facilities are encouraged where possible.

## Land Use Mix:

- Ensure human scale factors are explicit within the policies. In the current policy, only absolute residential or employment density targets by area are identified; however, the same targets could be achieved through a reduced number of very high density tall buildings or through a more homogeneous distribution of medium density development. Experts in land use planning and urban design caution that taller buildings along a transit corridor do not necessarily equal healthier, walkable communities and cities. Land use mix, public transit, diversity in employment and housing including affordable housing, and proximity to amenities are the more important factors for promoting walkable and complete communities.<sup>ii</sup> Human scale factors can be considered to promote walkability, connectivity, and housing affordability. Identify for instance the extent to which existing tools such as the LEED Standard for Neighbourhoods can help support the message of human scale development.

## Nutrition and Food Systems:

- Policies to support urban agriculture and food systems connections from cities to rural agricultural lands should be included as part of building food-friendly, healthy communities. Urban food production, waste reduction through composting, and related community food initiatives are a key part of building healthy, inclusive and livable communities. Policies for urban food production should consider how it nourishes people and the environment, protects against climate change, promotes social justice, creates local and diverse economic development and builds community.
- Align with work of others to ensure a healthy food system in Ontario. For example, many key agriculture, food, and health players have been involved in a collective impact approach to develop a food and nutrition strategy for Ontario. Such a food system plan could address all of the goals of this review, and particularly address the need for a “cross-government, multi-stakeholder coordinated approach”.<sup>iii</sup>

## Rural Communities:

- It is important that the provincial plans include policies that support economic development of rural communities taking advantage of local resources. Both the agrifood and mineral aggregate resource sectors should be encouraged but better regulated to ensure that the natural environment is protected.

## Coordination:

- Proposed changes generally support development of complete, compact communities, increased density, mixed uses and alignment of land use, transportation and better mobility choices. Further improvement could add requirements to require consideration of health impacts and health criteria when assessing land needs and development proposals.
- Continue to coordinate reviews of complementary plans (i.e., PPS, the Big Move, Lake Simcoe Protection Plan, Climate Change Action Plan, etc.) to ensure consistent messaging and identify synergies and conflicts within the plans.
- Greater accountability in the implementation of the plans and related outcomes needs to occur. This could be addressed through linking incentives to monitoring and rewarding municipalities for exceeding minimum requirements (i.e. link provincial investments in public transit and transportation infrastructure to municipal performance and adherence to requirements for density and land use mix).
- Investments in transit, and other mobility infrastructure, by the Province must accelerate to support increased density, intensification, and growth.
- Ensure infrastructure funding arrangements (e.g., development charges, land transfer tax rebates, funding formulas for schools and hospitals, and so on) and the incentives they provide with respect to the location of future development and the appropriateness of those incentives align with the goals contained in the plans.

## Comments and Recommendations on the Growth Plan for the Greater Golden Horseshoe

- **Section 1.1 Pg2-Paragraph3-Bullet3:**

Recommendation:

- Consider adding links to Age Friendly Communities (AFC): “A growing and aging population will result in...” **the need for a more inclusive and accessible age-friendly community that considers the physical and social environment of all ages, is able to respond to the diverse needs of all residents, regardless of age and/or ability, and provides an “...appropriate range and mix of...” affordable “...housing...” and transportation “...options and for health care and other amenities in accessible locations...” according to the World Health Organization.**

- **Section 1.1. Introduction - pages 2 -3.**

Comment:

- Land-use planning and the built environment have a direct impact on factors, such as employment, social support networks, and the physical and social environments that influence health and health equity. Reducing health inequities through land-use planning involves improving opportunities for all people to make healthy choices, and reducing exposure to circumstances and substances that lead to poor health outcomes. Land-use planning decisions based on health and equity principles will help create environments that foster the growth of healthy children and productive adults needed for the long-term prosperity of Ontario.

Recommendations:

- Retain the listed challenges to be addressed over the coming decades
- Add the following challenges associated with growth: Increased demand for infrastructure, community services and facilities including green space associated with growth should be addressed with the goal of reducing inequities and promoting health equity through needs based investment in infrastructure and public service facilities to build complete communities.

- **Section 1.2 Introduction, pages 4-5.**

Comment:

- The physical form of the built environment and the quality of the natural environment are key determinants of health. Inequities in the distribution of accessible green space, infrastructure for public transport and active transportation, and public services and facilities including a vibrant public realm within communities.

Recommendation:

- In the ‘vision for the GGH’ box, include the concept of social equity within the statement on how urban centres in the GGH will grow to be an economic powerhouse: “Urban centres will be characterized by vibrant and more compact settlement and development patterns, will provide ~~diversity of~~ **diverse and equitable** opportunities for living, working and enjoying culture and will support climate change mitigation. The



evolving regional economy of the GGH will have matured into an economic powerhouse of global significance. It will function as Canada's principal international gateway".

- **Section 1.2, pages 5: Pg5-Vision for the GGH Box at top-Paragraph5-Line1:**

Recommendation:

- Consider adding to the sentence beginning on line 1: "All of this will translate into a place where residents...." **of all ages and abilities can** "...enjoy a high standard of living and an exceptional quality of life." **Pg5-below the Vision for the GGH Box-Paragraph3-Line 4:** Consider adding AFC link to the sentence beginning with: "Now is the time to build on the progress that has been made towards creating more complete communities that are compact, transit-supportive, make effective use of infrastructure investments..." **and are also more age-friendly and inclusive to residents of all ages** "...while protecting our agricultural and natural areas and supporting climate change mitigation as Ontario moves towards net-zero communities in the long-term."

- **Section 1.2.1 (Guiding Principles): Pg6-Paragraph2-Bullet1:**

Recommendation:

- Consider adding to the bullet starting with: "Design complete communities..." **and age-friendly communities** "...to meet the physical and social "...needs..." **of people of all ages and abilities** "...for daily living throughout an entire lifetime, and support healthy and active living."

- **Section 1.2.1 (Guiding Principles):**

Comment:

- In the proposed Plan, on page 4, under "vision for the GGH", it is stated that communities will be supported by the pillars of a "strong economy, a clean and healthy environment and social equity." Social equity is fundamental to reducing health inequities and this concept should be integrated into the policies in the Plan. On page 6, the principles listed as the guiding principles for the policies in the proposed Plan should include a principle on how land use planning and planning for investment in infrastructure will be based on the concept of social equity.

Recommendation:

- Consider the proposed addition to the guiding principles: Integrate social equity considerations into planning for investment in infrastructure and public services to create communities where there are no disadvantages in the physical environment so that people can achieve their fullest health potential.

- **Section 2.0 (Where and How to Grow):**

Comment:

- Green space includes parks, ravines, school yards, private yards, street trees, landscaped open spaces along streets and around buildings, cemeteries and green roofs. [The evidence review conducted by Toronto Public Health](#) concluded: Green space improves physical health, mental health and wellbeing of urban residents; frequent access to nearby green space is important, especially for children; nearby green space may

provide added benefit in low-income neighbourhoods; green space that is perceived as unsafe and poorly maintained does not provide health benefits.

Recommendation:

- Strengthen the concept of green space for human health and wellbeing within the definition of green infrastructure in the proposed Plan (please refer to comments for section 7).

- **Section 2.1 (context): Pg10-Paragraph3 below the Box:**

Recommendations:

- Consider including the term/concept “**age-friendly communities**” with complete communities as the age-friendly community framework is much broader and more comprehensive than “complete communities”. For example: “This Plan is about accommodating forecasted growth in complete communities, whether urban or rural, existing or new. These are communities that are well designed to meet the...” **needs of people of all ages and abilities for daily living across the lifespan from young to old by providing convenient access to appropriate employment and volunteer opportunities, local and community health programs/services, and a range of accessible and affordable housing and transportation options to accommodate the diverse range of ages, abilities, incomes** “... and household sizes.”
- **Pg.11-Paragraph2-Line3:** Consider adding to the sentence that starts on line 3: “The continued revitalization of urban growth centres as meeting places, locations for cultural facilities, public institutions and major services and transit hubs with the potential to become more vibrant, mixed-use, transit-supportive communities is particularly important...” **as the aging population increases and the Province moves towards supporting communities to become more age-friendly.**
- **Pg12-Paragraph1-Line8to9:** Consider making a link to AFC and health by expanding on the last sentence of this paragraph that begins on line 8 with: “Moreover, an increased modal share for transit and active transportation ensures reduced air pollution and improved public health outcomes...”, **such as better air quality, increased physical activity and positive mental health, improved access to services, and greater opportunities to stay socially connected.**

- **2.2.1 (Managing Growth): Pg14-#2b:**

Recommendations:

- Consider including AFC link to this bullet: “building complete communities with compact built form in settlement areas” **and age-friendly communities that are more inclusive, accessible, and better able to meet the needs of residents of all ages and abilities.**
- **Pg15-#3:** Consider including AFC as an achievement along with “complete communities”.
- **Policy 3.d (v)** – Proposed change to include the concept of green space for human health to support the achievement of complete communities that support the overall quality of life including human health, for people of all ages and abilities through the

planning for and provision of: **“a supply of parks, trails, green space and other recreation facilities...”**

- **2.2.2 (Built Up Areas): Pg17-#5c:**

Recommendation:

- Consider adding the following to the end of this bullet that begins with: “ensure the development of high quality urban form and public open spaces...” **that also considers the unique needs of Ontario’s aging population, as well as, people with disabilities.**

- **2.2.3 (Urban Growth Centres) Pg17-#2a:**

Recommendation:

- Consider elaborating on this bullet: “as focal areas for investment in regional public service facilities, as well as commercial, recreational, cultural and entertaining uses...” **to promote the social connectedness of residents of all ages and increase access to community programs and services.**

- **2.2.4 (Transit Corridors and Station Areas) Pg18-#4b:**

- Recommendation:

- Consider expanding on this bullet: “infrastructure to support active transportation, including sidewalks, bicycle lanes, and secure bicycle parking,...” **as well as features to improve a community’s age-friendliness, such as safe pedestrian crossings and signals (visual and audio), easy to read signage, well lit roadways and walkways, level curbs and building entrances, and appropriate seating with arm rests.**

- **Section 2.2.6 (Housing):**

Comment:

- The definition for complete communities (section 7) in the proposed Plan does not specify the need for "affordable" housing. The PPS does not include a definition for complete communities.

Recommendations:

- Include policy requirement to provide affordable housing for people on low to moderate income.
- Policy 2.2.6 (2): Proposed addition: "Notwithstanding policy 1.4.1 of the PPS 2014, to provide for a range and mix of housing types and densities municipalities will: ...d) plan to diversify their overall housing supply to achieve complete communities including the provision of affordable housing.

- **2.2.6 (Housing) Pg22-#2d:**

Recommendation:

- Consider expanding on this bullet at the end to make a link to AFC: “plan to diversify their overall housing supply to achieve complete communities...” **and enhance the age-friendliness of a community to meet the housing needs of people of all ages and abilities and enable residents to age in place.**

- **3. Infrastructure to Support growth (vulnerability assessments, page 28):**

- Recommendation:
  - The plan should consider providing standardized vulnerability assessment tools to municipalities and key sectors to determine these risks and areas of opportunity. The Ministry of Health and Long Term Care has developed Climate Change and Health Vulnerability Assessment and Adaptation Guidelines for health units across Ontario. The Ministry of Environment and Climate Change is developing climate and health models to support the health vulnerability assessment. Examples such as this showcase the value of cross-sectoral collaboration in the development of tools to assess climate change impacts, and in the implementation of action plans to build resiliency.

- **Section 3.2.1 (Integrated Planning)**

- Comment:

- Recognizing the critical role of the built environment in population health, the principles of health and health equity should be integrated in policies in all sections of the Growth Plan for the GGH.

Policy 3: This policy states that "priority will be given to infrastructure investments made by the Province that support the policies and schedules in this Plan."

- Comment:

- In order to reduce disadvantages in the built form in low growth, low income communities, investments to provide access to infrastructure for healthy living (e.g. transit, bike lanes, green space, housing, etc.) should be prioritized in communities where such opportunities are limited. Therefore, integrating health and equity principles in the policies and schedules in the proposed Plan is critical to ensuring infrastructure investment in Ontario improves health and wellbeing for everyone while reducing inequities.

- **3.2.2 (Transportation – General) Pg31-#2d:**

- Recommendation:

- Consider adding to the bullet beginning with: “offer multimodal access to jobs, housing, schools, cultural and recreational opportunities, and goods and services...” **that promotes social inclusion, employment, civic participation and physical activity and provides community support to all ages.**

- **3.2.5 Infrastructure Corridors.**

- Comment:

- Health Impact Assessment tools can be used to complement environmental and agricultural impact assessments.

Policy 1 (c): This policy states that "In planning for the development, optimization or expansion of existing and planned corridors and supporting facilities, the Province, other public agencies and upper- and single-tier municipalities will:...a)...b)...c) where applicable, demonstrate through an environmental assessment, informed by an agricultural impact assessment or equivalent, that any impacts to the agricultural system have been avoided or, if avoidance is not possible, minimized and to the extent feasible mitigated;"

Comment:

- In planning for development of/ expansion of existing corridors, the Province, municipalities and other agencies should (in addition to the agricultural and natural resources impact studies) ensure the health of the population/communities is protected and that disadvantaged communities are not additionally burdened with potential adverse impacts related to the proposed development.

- **3.2.8 (Public Service Facilities) Pg36-#2:**

Recommendation:

- Consider adding to the end of this bullet starting with: “Public service facilities and public services should be co-located in community hubs and integrated to promote cost-effectiveness...” **and accessibility for all ages and abilities.**

- **3.2.8 (Public Service Facilities).**

Comment:

- Neighbourhoods with few public service buildings within walking/ biking distance will benefit from new infrastructure for public services.

Policy 2 states that “Public service facilities and public services should be co-located in community hubs and integrated to promote cost-effectiveness” and Policy 3 states that “Priority should be given to maintaining and adapting existing public service facilities and spaces as community hubs to meet the needs of the community and optimize the long-term viability of public investments.”

Recommendation:

- Priority for investing in public service facilities and public services should be based on the principle of reducing inequities in access to services and facilities among communities.

- **4.2.9 A Culture of Conservation:**

Comment:

- c) air quality improvement and protection, including through reduction in emissions from municipal, commercial, industrial and residential sources: impact to neighbourhood air quality from the movement of goods as a significant proportion of air pollutants comes from diesel transport. Planning policies should ensure that sensitive populations are adequately separated from these sources of pollution. Develop tax policies that reward smart growth planning and climate change goals and discourage unsustainable planning, and development; and harmful environments and pollutants (e.g. Town of Oakville Health Protection & Air Quality By-Law.)

- **4.2.10 (Climate Change):**

Comment:

- We are in support of the new policy which requires municipalities to develop official plan policies to identify actions that will reduce greenhouse gas emissions and address climate change adaptation goals, aligned with the 2015 Ontario Climate Change Strategy and Action Plan. The new policy would encourage municipalities to develop greenhouse gas inventories and climate change strategies to reduce greenhouse gas emissions; and,

establish municipal interim and long-term greenhouse gas emission reduction targets. The health co-benefits of addressing climate change including better air quality, reduced urban heat islands, increased community resiliency, protection from infectious diseases and lower health care costs should be mentioned in the plan. Also, it is important to take steps to measure and report on these benefits in the performance indicator and monitoring section of the plan (page 58) in order to demonstrate the benefits of resilient communities. Updates to the Ontario Building Code to further support low impact development and green infrastructure are needed. Life cycle assessments need to incorporate climate change considerations. While the PPS requires asset management plans including the cost of replacing infrastructure, in order to fully account for infrastructure costs the plans must also consider the health costs associated with damage to infrastructure such as floods and power outages e.g. infectious diseases, injuries, etc.

- **5.2.4 (Growth Forecasts):**

- Comment:

- what about management of the changing needs of a rapidly growing older adult population? Older adults have diverse needs and the older adult population is expected to double in the next 15-20 years.

- **Implementation pg 53:**

- Comment:

- Greater accountability in the implementation of the plans and related outcomes needs to occur. This could be addressed through linking incentives to monitoring and rewarding municipalities for exceeding minimum requirements (i.e. link provincial investments in public transit and transportation infrastructure to municipal performance and adherence to requirements for density and land use mix).

- **5.2.6 (Performance Indicators and Monitoring):**

- Comment:

- Indicators and targets for levels of active transportation, affordable housing, green space and public transit use should be established.
    - Policy 1: “The Minister will develop a set of performance indicators to measure the implementation of the policies in this Plan. The Minister will monitor the implementation of this Plan, including reviewing performance indicators concurrent with any review of this Plan”.

- **5.2.6 (Performance Indicators and Monitoring) (page 58):**

- Comment:

- Expand the use of indicators to better monitor the achievement of compact, complete communities, including the explicit assessment of health impacts of land use and transportation planning. This can be done provincially by developing targets and indicators. It can also be achieved locally by clearly expressing the role that public health units can have in the identification of local public health impacts of land use development. Building on the growing body of evidence linking human health and well-

being with the natural and built environment, the province should lead the use of health impact assessments to identify benefits and potential negative outcomes as an important consideration in the development of complete communities. Support research on a province-wide environmental health tracking system to collect and analyze indicators of environment and human health. Such a system can identify linkages and support policies to protect human health and inform land use planning. It can also be used to increase public awareness of the health benefits in protecting water, natural areas and agricultural lands.

Recommendation:

- Provide direction for land use and transportation planning to work with public health to support improved health outcomes and mitigate potential negative impacts on health and the environment.

Comments:

- The Growth Plan could acknowledge the importance for land use and transportation planning in municipalities to involve public health units in health based analysis of plans.

● **7.0 Definitions.**

Recommendation:

- Recommended change (in bold) to the definition of *Complete Communities*: “Places such as mixed-use neighbourhoods or other areas within cities, towns and *settlement areas* that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, including an appropriate mix of jobs, local stores and services, **healthy food sources**, a full range of housing **including affordable housing** and *public service facilities*. *Complete communities* may take different shapes and forms appropriate to their contexts”.

## Comments and Recommendations on the Greenbelt Plan

● **Section 1.1 (Context): Pg2-Paragraph5-Line4:**

Recommendation:

- Consider adding to the sentence beginning on line 4 “...a clean and healthy environment and social equity...” **for all people of all ages and abilities.**

● **Vision 1.2.1.**

Comment:

- It is important that the plan mentions the growing evidence that the natural environment provides many benefits to human health including: improving air quality, reducing greenhouse gas emissions, preserving water quality, providing opportunities for physical activity and recreation, and addressing social and mental health.

● **Section 1.2.2 (Protected Countryside Goals) Pg.5-Paragraph1:**

Recommendation:

- Consider adding: “To enhance our urban and rural areas and overall quality of life...” **for residents of all ages and abilities** “...by promoting the following matters within the Protected Countryside:”
- **3.3 Parkland, Open Space and Trails Pg31-section titled “3.3 Parkland, open space and trails”- first bullet in the box:**  
Recommendation:
  - Consider adding to this bullet to make a link with AFC: “Recognition that parks, open spaces and trails are important components of “complete communities”, which also help to address the causes and impacts of climate change...”, **and Age-Friendly Communities, which helps create opportunities for people of all ages to access green spaces and to participate in physical activity in order to promote physical and mental well-being.**
- **3.3 Parkland, Open Space and Trails (3.3.3 (3 b) Description pg.33)**  
Recommendation:
  - Consider incorporating natural and built shade features in the following: “Providing facilities, parklands, open space areas and trails that particularly support an active, healthy community lifestyle.”
- **3.3.3 Municipal Parkland, Open Space and Trail Strategies Pg33-#4e:**  
Recommendation:
  - Consider adding to the end of this bullet: “Providing for multi-use trail systems which establish a safe system for both motorized and non-motorized uses...”, **including motorized mobility devices.**
- **3.4 Settlement Areas Pg34-First bullet in the Explanatory Text box:**  
Recommendation:
  - Consider adding to this bullet: “New goals for “settlement areas’ that would encourage the development of community hubs and the development of “complete communities” that have a long-term goal of becoming “net-zero communities...” **and communities that have an ongoing objective to be more age-friendly and inclusive to all ages and abilities, where feasible.**
- **3.4.1 Description Pg35-Paragraph 1-line5:**  
Recommendation:
  - Consider adding to the sentence beginning on line 5: “Land use patterns within settlement areas shall support the development of complete communities that support the long-term goal of becoming net-zero communities...” **and promote the creation of age-friendly communities to better support the growing older adult population.**
- **General Policies for the Protected Countryside: 4.1 Non-Agricultural Uses.**  
Recommendations:
  - Ensure the new “agricultural impact assessment” policy is applied to previously-approved development plans (i.e. “grandfathered”) on agricultural lands being allowed to remain approved under outdated legislation. New public highways, transit lines,



- railways, gas and oil pipelines, sewage and water service areas, power transmission and telecommunication lines should not be permitted in agricultural areas.
- The province working together with municipalities, ENGOs and local agencies should develop a coordinated urban forest strategy to protect urban and heritage trees.
- It would be beneficial for the Province to identify mechanisms to achieve a net gain of forest cover in both urban and rural areas. The Province should set a target under these plans for woodland/forest cover. It would help the Province meet its climate change targets by providing a carbon sink, improving air quality, and reducing energy usage as forested areas can reduce the urban heat island effect, and help buffer against the damaging effects of flooding during storm surges and respond to social determinates to health and achieve net zero communities.
- Recommendation:
  - Avoid siting new public highways, transit lines, airports, railways, gas and oil pipelines, sewage and water service areas, power transmission and telecommunication lines throughout the natural core areas, natural heritage or hydrogeological sensitive feature areas of the Greenbelt plan area. Conduct health impact assessment prior to siting the same within communities where people live, work and play.

## Comments and Recommendations on the Oak Ridges Moraine Conservation Plan

- **Introduction: Context Pg.3-Paragraph1-Line2:**  
Recommendation:
  - Consider adding to the end of the sentence beginning on Line 2: “The Greenbelt Plan, together with the Growth Plan for the Greater Golden Horseshoe build on the Provincial Policy Statement to establish a land use planning framework for the GGH that supports a thriving economy, a clean and healthy environment and social equity...” **for all ages and abilities.**
- **Some Key Land Use Policies Pg.7-“Settlement Areas”:**  
Recommendation:
  - Consider adding AFC to the sentence beginning on line 8: “The development of complete communities...” **and age-friendly communities** “...will, in part, be achieved by facilitating the development of community hubs that involve the co-location of public services...” **for all ages** “...to address local community needs to convenient locations that are accessible by active transportation and transit...” **and promote increased social participation, community engagement, and equitable access to community programs and services. Pg8-Paragraph 1 at the top of the page-Line2to5: Consider that the sentence beginning on line 2 and ending on line 5 needs a link to health, not just life and property. For example: “By increasing the resiliency of infrastructure and encouraging the use of green infrastructure, municipalities can reduce the risk of harm**

to life...”, **health** “...and property, decrease the need for costly repairs or replacement resulting from extreme weather events.”

- **Culture, Recreation and Tourism Pg.8-Paragraph4:**

Recommendation:

- Consider adding the end of the paragraph: “The trail system through the Oak Ridges Moraine shall provide non-motorized accessible recreational access through the Moraine to link with a system of parklands, water bodies, open spaces and trails across the Greenbelt...” **to provide all ages with better access to green spaces.**

- **Countryside Areas Pg.32-#13.1e:**

Recommendations:

- Consider adding AFC link to this bullet: “maintaining existing public service facilities and adapting them, where feasible, to meet the needs of...” **older adults and people with disabilities living in the community.**
- **Pg.32-#13.2g:** Consider adding AFC link to this bullet: “accommodating a trail system through the Plan Areas and trail connections to it...” **allows for greater access to green spaces for all ages and promotes physical activity and positive mental health.**

- **Plans of subdivision, site plan approval and lot creation in Countryside Areas Pg.35-#16.1b:**

Recommendation:

- Consider adding AFC link to this bullet: “design lots and roads...” to **enhance walkability and access to public transit** “...so as to minimize stream crossings and extensions into key natural heritage features.”

- **Settlement Areas Pg.37-#18.1(0.a):**

Recommendation:

- Consider adding AFC link to this bullet: “encouraging the development of communities that provide their residents with convenient...” **and inclusive,** “...access to an appropriate mix of employment, transportation options and local services and a full range of...” **affordable and accessible** “...housing...” **options** “...and public services facilities...” **regardless of age and/or ability.**

- **Part IV Specific Land Use Policies: Trail System Pg.64-#39.3.2:**

Recommendation:

- Consider adding AFC link to this bullet: “Parking, signage, washrooms,...” **lighting, seating,** “...and interpretive facilities to support access to the trail system...” **for all ages and abilities, where feasible.**

- **Small-scale commercial, industrial and institutional uses Pg.64-#40.1.c.iii:**

Recommendation:

- Consider adding AFC link to this bullet: “schools, places of worship, community halls, retirement homes,...” **seniors’ centres and/or older adult centres,** “...and cemeteries, intended mainly to serve nearby Rural Settlements within the Plan Area...” **to promote learning, community engagement, and social connectedness for all ages.**

- **Infrastructure Pg.65-#40.1.c.iii:**

Recommendation:

- Consider adding AFC link to this bullet: “public highways...” **roadways, bicycle paths and lanes, sidewalks and walkways, and pedestrian crossings to promote active transportation.**
- **Settlement Areas; pg. 37, 18 (2) (c)**

Recommendation:

- Consider addition of health and wellbeing context – “Promoting strong communities, a strong economy, a healthy environment and **opportunities for healthy and active living**”
- **Section 46:**

Comment:

- Stormwater Management Plans under section 46 of the ORMCP should encourage the use of green infrastructure as a stormwater mitigation technique. This should incent both maintaining existing green infrastructure and expanding it where feasible. Green infrastructure maintenance and expansion supports climate change adaptation and mitigation. Flooding has resulted in significant infrastructure cost implications for the Province, municipalities, and property owners.

## **Comments and Recommendations on The Niagara Escarpment Plan (NEP)**

The NEP recognizes the substantial public health benefits of the Niagara Escarpment such as providing drinking water, cleaning the air, recreational activities, social equity through access to natural environments and improved quality of life. There is no doubt that this significant geological feature contributes to the well-being of the people who live within its vicinity or who come to visit to enjoy its many trails, preserves and open spaces. OPHA values the draft Plan’s reference to considerations for the reduction of greenhouse gas emissions and attempts to mitigate climate change. OPHA also values the promotion of co-locating compatible public services to address local community needs within convenient locations that could be accessed by active transportation and public transit where available. OPHA recognizes the significance that nature brings to people’s physical, mental, spiritual and cultural being and that challenges can occur between the needs of the natural and built environment. Our association hope that your ministry receives our comments in the spirit of creating both healthy built and natural environments and that generations to come can benefit from this beautiful provincial asset.

### **General Comments/Recommendations:**

- Ensure that the maps being used have been ground-truthed in consultation with the affected municipalities. Current map restrictions could have implications on local official plan policy for community growth. Many communities are taking into consideration complete community design. The needs of natural space protection and healthy community growth and prosperity need to be balanced.

- Agricultural viability must be considered a high priority within the NEP through **more flexibility for agricultural uses** on lands impacted by the NEP.
- **Exemptions** to the NEP should be given to **public use facilities** such as fire stations, EMS stations, community parks/recreation areas and trails. With the emergency services it may be determined through careful analysis and calculation that the location of the facilities for the best response times should be located within the lands impacted by the NEP. Therefore special consideration should be given to exempt EMS from Niagara Escarpment Commission control. In addition, the creation of trails by local municipalities should also be exempt, as these trails can be used for active transportation as well as to enjoy the natural beauty of the escarpment.
- Where additional lands are going to be added to the NEP all land owners should be notified and consulted along with a **public consultation process**.
- Research indicates that people who have been exposed to nature and conservation areas are more likely to support conservation efforts. **Ensuring ease of access to the escarpment for recreational activities** can bolster support for the retention of these conserved areas.
- Consider **removal of urban plans** from the NEP (p.30)
- Consideration for **more transit use** with provincial support (p.32)
- Plan for complete communities that have **schools as community hubs** (p.32)
- Consider **location of municipal assets** such as hospitals (p.32)
- **Consistent language, tools and mapping** (p.34-36)
- Recreational Development Land Use. Section (2.11):
  - For those communities with lands that fall within the NEP and the Green Belt Plan, business and landowners have to comply with and apply for amendments within both Plans. This was also referenced within the Recreational Development Land Use section (2.11) and creates significant barriers to local economic growth. Consideration should be given to **ensuring that both Plans are completely aligned and that there is a streamline process put in place such that one application would satisfy both Plans**. Another option would be to exempt those lands from having to apply for amendments to both Plans and only need to apply for one such as the Greenbelt Plan. This could be implicated on page 4 of the document where it identifies that the “NEP takes precedence over the policies of the Provincial Policy Statement to the extent of any conflict”.

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<sup>i</sup> Available at <http://www.cugr.ca/tnrggh>

<sup>ii</sup> Condon, Patrick (2010). Seven Rules for Sustainable Communities. Washington, DC: Island Press.17-35.

<sup>iii</sup> Ontario Food and Nutrition Strategy Design Team (2014). Ontario Food and Nutrition Strategy. A plan for healthy food and food systems. Available from: <http://sustainontario.com/work/ofns/>