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Constituent Societies

Association of Ontario Health Centres

Association of Public Health Epidemiologists in Ontario

Association of Supervisors of Public Health Inspectors of Ontario

Canadian Institute of Public Health Inspectors (Ontario Branch)

Community Health Nurses' Initiatives Group (RNAO)

Health Promotion Ontario

Ontario Association of Public Health Dentistry

The Ontario Association of Public Health Nursing Leaders

Charitable Registration Number 11924 8771 RR0001 December 19, 2016

Ken Petersen Manager Ministry of Municipal Affairs and Housing Local Government and Planning Policy Division Provincial Planning Policy Branch 777 Bay Street Floor 13 Toronto ON M5G 2E5

Dear Mr. Peterson,

Re: Comments on EBR Registry Number: 012-7196, Consultation on Role of the Ontario Municipal Board in Ontario's Land Use Planning System

The Ontario Public Health Association (OPHA) appreciates the opportunity to provide comments on the role of the Ontario Municipal Board in Ontario's land use planning system.

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; and

- 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 (i.e. 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.

The OPHA's Health and Built Environment Workgroup has undertaken a review of the Ontario Municipal Board Public Consultation Document and EBR Notice and offers the following comments for your consideration. OPHA welcomes the proposed changes to the Planning Act as outlined in the Ontario Municipal Board (OMB) in Ontario's land use planning system EBR Notice and Ontario Municipal Board Public Consultation Document. We believe these changes will go a long way to support healthy, sustainable and safe communities by making the OMB more accountable, increase citizen participation, make the process less expensive, and will uphold municipal and provincial land use plans.

The OPHA is pleased to see the proposed changes incorporate many of the Complementary Recommendations from 77 and 78 outlined on page 160 in the December 2015 *Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe: 2015-2041* report including:

- Policies which will limit appeals to the OMB regarding official plans that are in conformity with provincial plans;
- Reviewing alternatives to the requirement that the OMB must consider matters "de novo";
- Revising rules, procedures and timelines to increase effectiveness and reduce delays;
- Exploring more collaborative processes to resolve disputes; and
- Increasing support for municipalities during OMB appeal processes, improving support for public participation and fair access to OMB processes, and enacting proposed changes to the Planning Act that would support increased public involvement in planning decisions.

OPHA is also supportive of the proposed changes designed to encourage citizen participation in local land use planning by addressing barriers related to cost, fairness, accessibility and communication. The proposed measures to increase public education on OMB practices and procedures (e.g. more plain language, new user friendly website) and to expand the Citizen Liaison Office (CLO) will help to further address the barriers while strengthening the citizen participation process. It is important that health and equity principles are considered for any OMB change.

In addition, OPHA would like to see public health professionals be considered on the Multi-Member Panel as they have important qualifications and experiences that support healthy and sustainable communities and would be an asset to the OMB process. We welcome the opportunity to be part of this review and any follow-up processes. Shaping the built environment to support health is a high level investment and a key upstream determinant of health that has a significant impact on numerous health outcomes, from influencing risk factors for chronic diseases and acute illnesses, to protection from health hazards, to affecting equitable access to opportunities for health.

Thank you for considering our recommendations and we look forward to future opportunities for consultation.

Sincerely,

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Pegeen Walsh, Executive Director