



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.

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

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- Alliance for Healthier Communities (AHC)
 - 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 (CIPHI-O)
 - 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)

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RE: ERO 019-6163 – Proposed Planning Act and City of Toronto Act Changes (Schedule 9 and 1 of Bill 23 – the proposed More Homes Built Faster Act, 2022)

Thank you for the opportunity to comment on proposed changes to the Planning Act as outlined in ERO 019-6163 and as related to Bill 23, the proposed More Homes Built Faster Act.

As noted in our November 16th submission to the Legislative Assembly of Ontario, Standing Committee on Heritage, Infrastructure and Cultural Policy on Bill 23, the Ontario Public Health Association (OPHA) fully supports the need for Ontario to find more affordable housing opportunities for its residents and create healthy, equitable and climate-resilient communities. At the same time, it is vital that these processes, including legislative changes, are undertaken in a manner that reduces the risk of inadvertent harms and inequities to the health and climate resiliency of communities.

Public health agencies have long recognized the connections between healthy environments and population health, and thus the importance of healthy public policy across all sectors to strengthen health protection and equity. This includes policies related to housing, the built and natural environment, land-use planning, climate-resiliency including mitigation and adaptation, and ecosystem protection.

OPHA supports action to create more rental and ownership types of housing that prioritizes affordable, healthy and environmentally sustainable housing. Actions such as intensification and transit-oriented development can be health and equity promoting, without compromising other vital attributes required for healthy and equitable communities including: access to, and protection provided by, parkland and other greenspace; access to affordable, sustainable and active transportation; and healthy, energy-efficient housing units.

OPHA urges the Government of Ontario to pursue affordable housing opportunities through legislative changes to the Planning Act that:

1. Strengthens inclusionary zoning policies and allows for additional dwelling units on existing residential properties in settlement areas with municipal water and sewage services, and where additional units are affordable and will not diminish access to greenspace.

2. Achieves higher density around transit corridors through equitable transit-oriented development.
3. Maintains the ability of municipalities, through site plan control, to regulate sustainable design and implement of municipal green building standards.
4. Maintains the upper-tier municipalities' approval responsibilities for coordinating community planning and helping create healthy, complete and climate-resilient communities.

OPHA supports changes to the Planning Act that strengthen the provision for additional dwelling units on existing residential properties in settlement areas with municipal water and sewage services, and where additional units are affordable and will not diminish access to greenspace. Additional residential units can provide a degree of affordable rental housing and additional income for home-owners, and supports intensification and higher densities around transit. OPHA also supports inclusionary zoning policies that require new development to include affordable housing units, creating mixed-income housing. Prohibiting exclusionary single-family zoning policies is one measure to increase gentle density, including duplexes, triplexes and four-plexes, next to existing density and close to transit and other active transportation routes.

OPHA supports higher density around transit corridors where it prioritizes equitable transit-oriented development. Equitable transit-oriented communities promote healthy, active and sustainable communities by encouraging active modes of travel including walking, cycling and public transit, by creating equitable, mixed-use, affordable housing neighbourhoods with access to nearby services and amenities, and by reducing single-occupancy vehicle use and the associated greenhouse gas emissions that contribute to climate change. With the transportation sector responsible for approximately one third of all greenhouse gas emissions in Ontario, encouraging public transit through transit-oriented development can help Ontario meet its climate targets.

OPHA does not support changes to site plan control provisions under the Planning Act that would remove the ability of municipalities to regulate architectural details and landscape design. Removing the ability of municipalities to implement green development standards and other site planning requirements, undermines the affordability and health benefits that energy efficient and climate resilient buildings provide to owners and tenants. Eliminating the review of sustainable design from Site Plan severely restricts the ability of municipalities to require energy efficiency to be addressed in the design of new buildings. Proposed changes that limit site plan control will make future homes more unaffordable, less efficient, and less resilient to the health impacts of climate change. On the flip side, strengthening policies for energy efficiency and environmental sustainability of new development provides a significant opportunity for the province to meet its climate targets, reduce greenhouse gas emissions, create jobs in the green energy sector, lessen the housing affordability crisis through home energy cost savings, and create healthier indoor environments.

OPHA does not support changes to the Planning Act that remove the planning policy and approval responsibilities from upper-tier municipalities. Regional planning (upper-tier) plays an essential role in coordinating community planning and helping to develop healthy, complete, and climate-resilient communities. Planning and development of complete communities, including regional transportation, utilities and other critical infrastructure, is coordinated at the regional level to support health and quality of life. Conformity to regional official plans and policies ensures that development applications and land use planning is guided by regional goals, that focus on the public good and include provisions that emphasize human and environmental health. The removal of upper-tier approval powers could impact the ability of public health units associated with upper-tier municipal governments to protect health in their communities, such as the maintenance of healthy built and natural environments, implementing climate adaptation measures, addressing air quality and noise issues, responding to road safety concerns, and promoting walkability and social and physical activity.

Thank you for considering our concerns and recommendations with respect to proposed changes to the Planning Act as outlined in ERO 019-6163. We would welcome the opportunity to meet with the government to discuss the proposed changes and solutions that address concerns related to this proposed legislative change.

Sincerely



Executive Director
Ontario Public Health Association

More about the Ontario Public Health Association

OPHA has established a strong record of success as the voice of public health in Ontario. We are a member-based, not-for-profit association 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 advocacy, capacity building, research and knowledge exchange. Our membership represents many disciplines from across multiple sectors.

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