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Provincial Land Use Plans Branch
Ontario Ministry of Municipal Affairs and Housing
13th Flr, 777 Bay St
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RE: ERO 019-6177 – Review of A Place to Grow and Provincial Policy Statement

Thank you for the opportunity to comment on ERO 019-6177 – Review of A Place to Grow and Provincial Policy Statement (PPS). As noted in our November 16th submission to the Legislative Assembly of Ontario, Standing Committee on Heritage, Infrastructure and Cultural Policy on Bill 23ⁱ, 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 the review of provincial policies, plans and legislative changes, are undertaken in a manner that reduces the risk of inadvertent harms and inequities to the health and climate resiliency of communities.

Please consider these public health and equity-focused comments in the review of the *Provincial Policy Statement, 2020*, and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*. Previous OPHA comments remain relevant and are included in Appendix A – highlights from OPHA's submission on the *Provincial Policy Statement review (2019)* and on *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan (2019)*.

There is strong cross-sectoral understanding of the vital interconnections between healthy environments, healthy communities, and human health. Alongside this understanding is the acknowledgement that all sectors and all levels of government must work collaboratively on actions to achieve healthy, equitable and climate-resilient communities. This includes policies related to housing, the built and natural environment, land-use planning, climate-resiliency including mitigation and adaptation, and ecosystem protection. The signing of the Kunming-Montreal Global Biodiversity Frameworkⁱⁱ earlier this month is an international,

cross-sectoral commitment and acknowledgement of the urgent need to take an ecosystem-based approach to address the multiple planetary health crises we face, including climate change, biodiversity loss and pollution.

Public health agencies have long recognized the connections between healthy environments and population health, and thus the importance of action across all sectors, including public policy, to strengthen health protection and equity. Many of our OPHA members work at the local public health unit level and are actively engaged with municipalities and other partners to build healthy communities and achieve the Ontario Public Health Standards goals which include: *“To reduce exposure to health hazards and promote the development of healthy built and natural environments that support health and mitigate existing and emerging risks, including the impacts of a changing climate.”*ⁱⁱⁱ

The Provincial Policy Statement, 2020 (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (APTG), also recognize that healthy built and natural environments are inextricably linked to the health and wellness of the people and communities they serve. There are many statements in both plans that reflect the kind of Ontario that will benefit the health and wellbeing of residents, and the built and natural environments on which they depend.

Given the importance of both the PPS and APTG in shaping and managing growth in Ontario, **OPHA is not supportive of integrating the two documents into one new Province-wide planning policy instrument.** OPHA fully supports the need for Ontario to find more affordable housing opportunities, however, the proposed integration of the PPS and APTG contradicts the original intent of these distinct but complimentary policy documents. The PPS provides overarching policy direction on matters of provincial interest related to land use planning and development applicable to all areas of Ontario while APTG provides a unique, comprehensive approach to land use planning across communities in the Greater Golden Horseshoe. The APTG Plan has resulted in balanced growth that has made more efficient use of land, focused growth in urban centres and created communities that are more resilient and adaptable to the impacts of a changing climate. Merging the PPS and APTG will more likely decrease the affordable housing supply and may lead to more sprawl while moving away from the development of compact, complete, carbon-neutral and climate-resilient communities. Sprawled development increases per capita land consumption, and increases the distance between homes, businesses, services and jobs, which raises the cost of providing public infrastructure and services and increases transportation costs.

Notwithstanding the above comments and the position of OPHA that the 2 policy documents remain as distinct and separate planning tools, if the Government of Ontario intends to proceed with plans to integrate the 2 policy documents, OPHA strongly urges the province to consider and incorporate these essential components described below to ensure population health, health equity and climate resiliency are prioritized in land-use planning, development plans and growth plans.

Any proposed new integrated planning policy instrument must retain these core elements of each document that establish essential components for healthy, equitable and climate resilient populations and communities. Greater consideration of health impacts must be incorporated into the decision-making process, and any streamlining of planning policy should not come at the expense of weakened environmental or public health

and safety guidelines, standards or regulations. These regulations protect and promote health through better air quality, protected drinking water supplies, reduced urban heat islands, mitigation of vector-borne diseases, and increased community resiliency, physical activity, and general well-being. Efforts to streamline development and reduce timelines needs to support the development of compact, complete, mixed-use, connected, and transit supporting communities as well as preventing encroachment on natural areas and agricultural lands.

To ensure that population health and health equity are prioritized within a new province-wide planning policy instrument that integrates the PPS and APTG, the core elements that must remain and/or be added, include: compact, complete, and low-carbon communities, climate resiliency (both adaptation and mitigation), meaningful engagement with Indigenous communities, public health and safety, affordable and accessible housing, environmental protection including access to green space, multimodal transportation that prioritizes active transportation and transit, and community infrastructure that considers not only the hard services (water and wastewater, transportation, accessibility) but also the social infrastructure (e.g. the public realm, and aspects of community planning that enable social connection and community engagement that are welcoming and inclusive for all).

While OPHA agrees with the inclusion of the majority of the core elements of the new policy instrument as described in ERO 019-6177, there are core elements missing. OPHA urges the Government of Ontario to include the additional core elements:

- **Addressing climate change:** Adapting to climate change (climate-resiliency measures) and mitigating climate change (low-carbon buildings, transportation systems, and community design)
- **Inclusive, accessible and welcoming for all:** Increasing social and health equity, addressing the social and ecological determinants of health
- **Incompatible land uses and exposure to harmful levels of pollution:** Protecting, by physical separation and/or other means (e.g. buffering) sensitive uses (residential development, schools, etc.) from sources of pollution e.g. traffic, industrial areas
- **Consultation and engagement with Indigenous peoples:** Recognizing the unique role and inherent rights of Indigenous peoples.

OPHA urges the government to revise the housing core element to emphasize the priority that must be given to affordable, accessible, and quality housing, not simply attainable:

- **Affordable, accessible and attainable housing supply:** Prioritizing a mix of good quality affordable housing that is defined in terms of income not market value, and addressing the root causes of the housing crisis in Ontario, the utmost of which is affordability.^{iv}

OPHA urges the Government of Ontario to enhance not dilute natural heritage protections and public health and safety protections from natural and human-made hazards:

- **Natural heritage:** Maintaining/enhancing strong policy directions to reduce development impacts including restrictions of development that impacts natural ecosystems and not by offsetting or compensating for ecosystem protections in other areas.

- **Natural and human-made hazards** – Maintaining/enhancing strong policy direction for public health and safety by prohibiting development in hazard areas, not by allowing development in these areas, or by limiting restrictions only to “areas of highest risk”.

OPHA urges the government to retain the land use planning policy concepts within the new integrated planning policy instrument that are consistent with the evidence supporting healthy built and natural environments:

- **Compact, complete communities:** Incorporating health-promoting and climate-friendly land-use planning policies to achieve compact, complete communities that support active transportation and public transit.
- **Community infrastructure:** Planning for infrastructure that is integrated with land use planning and growth management, prepares for the impacts of climate change, promotes green infrastructure, and optimizes the use of existing infrastructure and public service facilities. Planning for the efficient use of land to ensure sufficient school capacity and the integration with municipal planning.

1. Addressing climate change:

OPHA is extremely concerned that the core elements of the new policy instrument described in ERO 019-6177 make no mention of climate change and the urgent need for adaptation and mitigation. The existing PPS and APTG documents recognize the opportunities for climate action through thoughtful land use and transportation planning. For example, the PPS devotes an entire section to Energy Conservation, Air Quality and Climate Change: *“Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the impacts of a changing climate through land use and development patterns which ... promote design and orientation which maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation and green infrastructure”* The APTG Plan also acknowledges the community planning role in both mitigating and adapting to climate change: *“[Complete communities] support climate change mitigation by increasing the modal share for transit and active transportation and by minimizing land consumption through compact built form. Building compact and complete communities, and protecting agricultural lands, water resources and natural areas will help reduce greenhouse gas emissions and ensure communities are more resilient to the impacts of a changing climate.”*

OPHA urges the Government of Ontario to fulfill its commitment from the 2018 Made-in-Ontario Environment Plan^v to address climate change, and to speed up progress to reduce greenhouse gas emissions and help communities adapt to the risks of our changing climate. This can be partly achieved by strong and effective land-use planning policies that acknowledge the climate crisis and take urgent measures to mitigate risks to Ontarians. The Environment Plan progress update in 2020^{vi}, indicates that the government has: *“Updated the Provincial Policy Statement to include changes to enhance direction for planning authorities to prepare for the impacts of a changing climate. It also includes enhanced stormwater management policies to protect water and support climate resilience.”* Strengthening climate-resiliency and climate mitigation policies within the new integrated planning policy instrument is vital to avoid additional disastrous consequences of climate impacts to our communities, our environment, and our economy.

Climate change adaptation, mitigation, vulnerabilities, and increased resiliency should be reflected throughout an integrated planning policy instrument to show consideration of the importance of these issues. Examples include: factoring in climate related risks and impacts into infrastructure investment and

development decisions, and incorporating findings from local climate change and health vulnerability and adaptation assessments^{vii}.

To reiterate our comments from November 16, 2018, in our submission to the Ontario Ministry of Environment, Conservation and Parks: Consultation on the Made-In-Ontario Climate Change Plan (Environment Plan)^{viii} **OPHA urges the Government of Ontario consider land-use planning, growth planning and transportation planning policies as effective and outcomes-based tools to meet its climate commitments and achieve optimal health for Ontarians:**

- *“Ensure that actions to reduce greenhouse gas emissions address the primary sources of carbon pollution in Ontario – transportation, industry, and buildings.*
- *In developing and implementing a climate change plan for Ontario, give priority consideration to the multiple ways in which the health and well-being of Ontarians will be impacted by climate change.*
- *Consider ecosystem health and its linkages to human health when developing and implementing climate change actions.”*

2. Inclusive, accessible and welcoming communities: connectedness – social environments:

While quality affordable housing must be a priority, housing alone, without the attributes that makes a community (e.g. public realm, opportunities for social connection, accessibility) will not achieve healthy and liveable communities that “enhance human health and social well-being”.^{ix} **OPHA recommends that the Government of Ontario consider the advice and health evidence that jurisdictions such as the Province of British Columbia are following to foster social connectedness through strategic and land use planning.**

Examples include: (1) integrating social connectedness, history and culture into land use planning projects, (2) designing public spaces that prioritize human interactions and social connections, (3) designing the physical environments of neighbourhoods to encourage social connections through mixed-use developments, pedestrian-friendly features and community amenities, and (4) including social connectedness and belonging in the objectives, goals and strategies in official plans, regional growth strategies and other municipal plans.^x

3. Incompatible land uses and exposure to harmful Levels of pollution

Both the PPS and APTG contain policies that support the protection of employment lands from conversion to other uses. It is essential that employment lands continue to be protected as the conversion to residential lands may lead to land use compatibility issues with nearby sensitive uses and may result in increased environmental exposure to air pollution, noise pollution and light pollution, which are risk factors for chronic diseases and acute health impacts. For example, locating residential development close to high traffic corridors, such as 400-series highways, increases exposure to traffic-related air pollution^{xi}. Health Canada estimates that 500 premature deaths in Ontario are from exposure to traffic-related air pollution every year.^{xii} In addition, recent Ministerial Zoning Orders (MZO) have resulted in some employment lands being rezoned residential uses resulting in land use compatibility concerns with adjacent industrial lands.

OPHA supports strengthening policies to improve public health protective measures by requiring appropriate and health-protective separation distances as demonstrated through technical studies. In cases where avoidance (physical separation) alone may not be feasible, technical studies can identify other options to minimize and mitigate potential impacts of incompatible land uses e.g. berm, wall, planting^{xiii}. The evidence on the health impacts of traffic-related air pollution highlights the need for detailed technical studies and specific

guidance on land use compatibility under a Streamlined Planning Framework that is outcomes-focused, addresses potential health concerns related to land use compatibility, and ensures major facilities and sensitive land uses are planned and developed to avoid, minimize and mitigate any potential adverse effects from odour, noise and other contaminants. Technical studies are needed to evaluate compatibility between the proposed uses and existing lands to fully understand the extent, magnitude, and frequency of potential adverse effects. The outcome of these studies helps inform specific mitigation requirements. As noted in Health Canada's assessment on exposure to traffic-related air pollution (TRAP) in Canada^{xiv}:

- *"Findings of the analysis are in agreement with previous studies and add to the evidence base for informing communities, public health authorities, city planners, school boards and other stakeholders on the health risks of TRAP. In line with the objective of limiting exposure to air pollution for Canadians, the findings also suggest that urban design and development practices could be adjusted to protect populations, including vulnerable groups, from elevated concentrations of TRAP."*
- *"Policies and investments to favour sustainable transportation solutions that lower traffic emissions or volumes, such as amenity-dense neighbourhoods, improved infrastructure for cyclists and pedestrians, zero-emission vehicles and electrified public transit systems, can contribute to reducing exposure to TRAP for populations residing near roadways. "*

4. Meaningful engagement with Indigenous peoples:

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) recognizes the urgent need to respect the inherent rights of Indigenous peoples, and that respect for Indigenous knowledge, cultures and traditional practices contributes to sustainable and equitable development and proper management of the environment.^{xv} **OPHA urges the Government of Ontario to recognize the inherent rights and unique role of Indigenous peoples, and to engage in meaningful consultation with Indigenous communities in the review of all land use planning and development policies, including the Provincial Policy Statement and A Place to Grow.**

OPHA reiterates our comments on the 2019 Consultation on the Provincial Policy Statement Review with respect to meaningful engagement with Indigenous communities, recommending that *"policy guidelines be developed in consultation with Indigenous (First Nations, Métis, and Inuit) communities. These guidelines should include a provincial responsibility to acquire consent from these Indigenous groups on land use issues."* Most recently, the Chiefs of Ontario and the First Nations Leadership expressed serious concern with the Government of Ontario's actions relating to Bill 23, and the lack of engagement and consultation with First Nations on policy and legislative changes^{xvi}. As quoted by Ontario Regional Chief Glen Hare in the Chiefs of Ontario November 23, 2022, communications: *"The Government of Ontario's tabling of Bill 23 is a blatant violation of First Nations' inherent, domestic, and international rights over their ancestral and traditional territories. Bill 23 will inevitably harm Ontario's environmental heritage and weaken land and water environmental protection."*^{xvii}

5. Affordable, accessible and attainable housing:

OPHA urges the Government of Ontario to prioritize quality, affordable and accessible housing, and to revise the definition of "affordable housing" as a percentage of income not market value. OPHA also urges the Government to address the root causes of the housing crisis in Ontario. As noted in the Wellesley Institute's Policy Position - Housing^{xviii}, *"there is no evidence that market housing construction alone will end*

homelessness, improve equity, or achieve affordability for lower income people.” Unaffordability, lack of housing, and poor-quality housing is associated with multiple adverse health effects and health inequities, including exposure to health hazards^{xix} and risk of contracting infectious diseases^{xx}.

With respect to housing supply, OPHA recognizes the urgent need for many more affordable housing units to be built in urban and other settlement areas where people live, work and play. Several organizations have provided advice to the province on how this can be accomplished within existing municipal settlement boundary areas. Intensifying development within these existing settlement boundaries has multiple health and equity benefits, including providing more affordable housing, shorter and more sustainable commutes, equitable access to jobs and affordable transportation, reducing carbon emissions, increasing climate resiliency, improving social connections, and building healthier communities.

6. Natural heritage and natural and human-made hazards:

The historic agreement signed on December 19th at the UN Convention on Biological Diversity is a clear message from global leaders of the urgent need to preserve and protect nature^{xxi}. The Kunming-Montreal Global Biodiversity Framework recognizes this truth – that our natural environment is inextricable linked to the health of our communities:

- *“This agreement means people around the world can hope for real progress to halt biodiversity loss and protect and restore our lands and seas in a way that safeguards our planet and respects the rights of indigenous peoples and local communities.”*
- *“Biodiversity is interconnected, intertwined, and indivisible with human life on Earth. Our societies and our economies depend on healthy and functioning ecosystems. There is no sustainable development without biodiversity. There can be no stable climate without biodiversity.”*

OPHA urges the Government of Ontario to join global leaders and demonstrate its commitment to environmental protection by examining all goals and targets in the Global Biodiversity Agreement and considering how they can be achieved through provincial planning policy tools. Examples:

- **Goal A: The integrity, connectivity and resilience of all ecosystems are maintained, enhanced, or restored, substantially increasing the area of natural ecosystems by 2050**
- **Goal B: Biodiversity is sustainably used and managed and nature’s contributions to people, including ecosystem functions and services, are valued, maintained and enhanced, with those currently in decline being restored, supporting the achievement of sustainable development, for the benefit of present and future generations by 2050**
- **Target 1: Ensure that all areas are under participatory integrated biodiversity inclusive spatial planning and/or effective management processes addressing land and sea use change, to bring the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030, while respecting the rights of indigenous peoples and local communities**
- **Target 11: Restore, maintain and enhance nature’s contributions to people, including ecosystem functions and services, such as regulation of air, water, and climate, soil health, pollination and reduction of disease risk, as well as protection from natural hazards and disasters, through nature-based solutions and ecosystem- based approaches for the benefit of all people and nature**
- **Target 12: Significantly increase the area and quality and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably, by mainstreaming the**

conservation and sustainable use of biodiversity, and ensure biodiversity-inclusive urban planning, enhancing native biodiversity, ecological connectivity and integrity, and improving human health and well-being and connection to nature and contributing to inclusive and sustainable urbanization and the provision of ecosystem functions and services

- **Target 14: Ensure the full integration of biodiversity and its multiple values into policies, regulations, planning and development processes, poverty eradication strategies, strategic environmental assessments, environmental impact assessments and, as appropriate, national accounting, within and across all levels of government and across all sectors, in particular those with significant impacts on biodiversity, progressively aligning all relevant public and private activities, fiscal and financial flows with the goals and targets of this framework**^{xxii}

Consideration of the natural environment in planning decisions must ensure that protections for natural heritage systems are paramount, and not superseded by other planning considerations. Natural heritage areas including those areas in the Greenbelt Plan and Oak Ridges Moraine Conservation Plan need to be given the utmost protection as they contribute to carbon sequestration and storage and help combat climate change impacts by providing natural shade and addressing urban heat islands and help buffer against the damaging effects of flooding during storm surges.

OPHA urges the Province of Ontario to prioritize protection of human health and the natural environment by ensuring that a consolidated PPS/APTG retains the provision, as provided for in the Places to Grow Act, 2005^{xxiii}, that where there is a conflict between policies *“with respect to a matter relating to the natural environment or human health, the direction that provides more protection to the natural environment or human health prevails.”* (Places to Grow Act, 2005, S.O. 2005, c. 13. s. 14 [4]).

To achieve this goal, **OPHA also urges the province of Ontario to heed recommendation 6 of the Auditor General of Ontario’s December 2021 Value-for-Money Audit: Land-Use Planning in the Greater Golden Horseshoe**^{xxiv} – *“So that land-use planning is well integrated with other related planning processes in the province, [the Office of the Auditor General] recommend that the Ministry of Municipal Affairs and Housing proactively engage with other provincial ministries and entities responsible for planning processes related to land-use planning on an ongoing basis.”* The auditor general identified the Ministry of Health as a provincial ministry that should be engaged (example provided of official plan amendments to make communities age-friendly through universal, accessible design in the built environment) as well as the Ministry of Environment (example provided of official plan amendments to improve building energy and water efficiency and reduce greenhouse gas emissions). The expertise and mandates of these ministries (Health “reduce exposure to health hazards”; and Environment – “tackle climate change”), and other agencies such as Public Health Ontario, local public health agencies, and the Ontario Public Health Association can ensure evidence-informed decision-making for healthy built and natural environments. Another example that speaks to the need for the “health” voice and cross-sectoral collaboration and consultation is found on the Government of Ontario website^{xxv}, that states that the Ministry of Environment, Conservation and Parks (MECP) *“coordinates Ontario’s actions on climate change in the name of healthier communities, ecological protection and economic prosperity.”*

OPHA urges the Government of Ontario to enhance policies both for the protection of natural heritage from development pressures, and for the protection of public health and safety from natural and human-made hazards. Strong environmental protection policies within an integrated planning policy instrument can achieve both.

Healthy natural ecosystems are essential to human health. Natural ecosystem services include regulating air and water pollution, flood protection, erosion control, carbon sequestration, provision of nutritious food and clean water, surface temperature regulation, and several cultural, recreational, physical and mental health benefits.^{xxvi} There is mounting evidence of the health and equity benefits of access to nature, including parkland for all populations, and in particular, children and youth and people living with inequities. Frequent access to nearby green space is important, especially for children, and nearby green space may provide added benefit in low-income neighbourhoods.^{xxvii}

As noted in our comments on *ERO 019-6160 – Proposed Updates to the Ontario Wetland Evaluation System*, greater consideration of the scientific evidence, including direct and indirect human health impacts, must be incorporated into the decision-making process affecting natural ecosystems including wetlands. **OPHA does not support the proposed removal of wetland complexing or the inability to re-evaluate existing complexes.** These changes would expose provincially significant wetlands and wetland complex lands into consideration for urban boundary expansion and residential development. Partnered with potential changes to the Provincial Policy Statement, this could significantly increase climate risks, and exacerbate local flooding, erosion issues and biodiversity loss.

The *Independent review of the 2019 flood events in Ontario* report pointed out actions to prevent flood-related emergencies or disasters from occurring includes: “*land use planning and regulatory restrictions to keep development out of the floodplains and other hazardous areas. While we cannot prevent flooding from occurring, keeping people and property out of flood-prone areas helps ensure naturally occurring flood events do not result in local emergencies.*”^{xxviii} With clear evidence that climate-related heavy rainfall events will continue to increase, it is counter intuitive to remove wetland protections that allow development to occur in these sensitive areas.

The Government’s proposal to integrate the PPS and APTG suggests that the new planning policy instrument would continue to “*protect people and property in areas of highest risk*”. It is challenging to see how this is a health protective measure when the province is also proposing to limit studies and assessments on identifying hazards and risks.

The current language within the PPS, s. 3.0 Protecting Public Health and Safety, includes important policies to direct development away from areas of natural or human-made hazards, and acknowledges that the province, planning authorities and conservation authorities must work together to mitigate potential risks including the risks associated with a change climate. **OPHA urges the Government of Ontario to expand this policy direction for “public health and safety” to include all climate-related health risks of natural hazards beyond flooding.** These include extreme weather events, extreme heat, extreme windstorms, drought and wildfires, and the implications for physical and mental health impacts^{xxix}.

As noted in our comments on *ERO 019-6141* – Legislative and regulatory proposals affecting conservation authorities, **OPHA urges the Government of Ontario to strengthen, rather than weaken, the ability of conservation authorities to protect natural ecosystems** from damages that ultimately impact human health, including the social, environmental and economic impacts of flooding and other pollution and climate impacts associated with unprotected natural environments. It is critical that pollution and conservation of land continue to be considered and assessed in the permitting decision process, as currently outlined in Clause 28.0.1 (6) (a) of the Conservation Authorities Act. This is essential to ensure land use compatibility to sensitive land uses within the land use development process to protect human and environmental health.

There is risk that development could be allowed in areas where it would not normally be permitted and/ or not subject to appropriate conditions. If development occurs in these amended permitted areas, it could impact the health and safety of the public. Additionally, these lands provide access to greenspace and recreational opportunities for the public. Access to greenspace play an important role to address chronic diseases such cardiovascular disease and diabetes, improves mental health, and helps reduce environmental exposures which impact health, such as extreme heat and air pollution. This may also lead to health inequities, especially for people most vulnerable who have limited access to parkland and with the least resources to adapt.

7. Compact, complete communities:

To reiterate our November 16th, 2022, comments on Bill 23, **OPHA urges the Government of Ontario to encourage higher density communities, enable healthy and sustainable transportation systems, and focus on the development of compact, complete, carbon neutral and climate resilient communities.** OPHA strongly encourages the province to prioritize health protection, health equity and the climate crisis in a new integrated planning policy instrument. As noted in the APTG plan: *“To support the achievement of complete communities that are healthier, safer, and more equitable, choices about where and how growth occurs in the Greater Golden Horseshoe need to be made carefully.”* This same principle applies to all areas of the Province and must be paramount in considerations for a new integrated planning policy instrument.

Both the current PPS and APTG policy documents include language that support the development of healthy built and natural environments and recognizes the multiple health and climate benefits of complete communities. The PPS acknowledges that *“Efficient land use and development patterns support sustainability by promoting strong, liveable, healthy and resilient communities, protecting the environment and public health and safety, and facilitating economic growth.”* The APTG plan recognizes that compact, complete and mixed-use communities: *“support quality of life and human health by encouraging the use of active transportation and providing high quality public open space, adequate parkland, opportunities for recreation, and access to local and healthy food. They also support climate change mitigation by increasing the modal share for transit and active transportation and by minimizing land consumption through compact built form.”* A growing body of research has identified that the way that communities are designed, built, and maintained impacts the health and well-being of residents. Transportation and land-use planning decisions influence (1) greenhouse gas emissions which are responsible for climate change, (2) exposure to traffic-related air pollution, extreme heat and environmental noise, (3) urban sprawl, (4) agriculture and local food production, (5) access to healthy foods and safe water sources (6) access to, and protection provided by, green spaces and natural environments, (7) the provision of mixed housing types that are affordable for all, (8) individual

and community climate resiliency, and (9) health behaviours such as physical activity, healthy eating and personal protective measures to reduce climate-related health risks. In turn, impacts are seen on rates of cardiovascular and respiratory illnesses, diabetes, cancer, heat-related, air pollution-related and climate-related illness and death, traffic-related injuries, mental health, and health equity. This ultimately burdens the health care system and increases health care costs.

8. Community infrastructure:

OPHA supports integrated municipal infrastructure planning that in turn supports smart growth – the design of compact, complete, climate-resilient and transit-supportive communities that focus on intensification and discourage urban sprawl. OPHA also supports the efficient use of land to ensure sufficient school capacity and the integration with municipal planning. Consideration for funding coordination of, and co-location of schools with compatible services, as well as school siting requirements that support active transportation and healthy community design, and that protect children from sources of air pollution such as high traffic corridors, is also recommended.

Retaining effective planning policies:

OPHA urges the Government of Ontario to retain the following principles, vision, and policy statements, and others within the current PPS and APTG that value and prioritize population health, health equity and climate resiliency in community, land-use and transportation planning:

From the Provincial Policy Statement, 2020:

- ***Strong, liveable and healthy communities promote and enhance human health and social well-being, are economically and environmentally sound, and are resilient to climate change***
- ***The province must ensure that its resources are managed in a sustainable way to conserve biodiversity, protect essential ecological processes and public health and safety,... It is equally important to protect the overall health and safety of the population, including preparing for the impacts of a changing climate.***
- ***Strong communities, a clean and healthy environment and a strong economy are inextricably linked. Long-term prosperity, human and environmental health and social well-being should take precedence over short-term considerations.***

From the A Place to Grow Plan:

- ***A Place to Grow Plan ... supports the achievement of complete communities, a thriving economy, a clean and healthy environment, and social equity***
- ***Rates of obesity, diabetes and cardiovascular illnesses are on the rise in the region, in part due to growing rates of inactivity linked to low-density and automobile dependent development patterns.***
- ***The impacts of a changing climate are already being felt. Communities and infrastructure must be adapted to be more resilient, greenhouse gas emissions across all sectors of the economy need to be reduced, and valuable water resources and natural areas need to be protected.***
- ***Municipalities shall engage Indigenous communities in local efforts to implement this Plan, and to provide the necessary information to ensure the informed involvement of these communities.***
- ***Vision: Its communities will be supported by a strong economy and an approach that puts people first. This approach protects the Greenbelt and will ensure a cleaner environment is passed on to future***

generations. *A Place to Grow* will support the achievement of complete communities with access to transit networks, protected employment zones and an increase in the amount and variety of housing available.

Transit and active transportation will be practical elements of our urban transportation systems. A **healthy natural environment** with clean air, land, and water will characterize the Greater Golden Horseshoe. Natural areas and agricultural lands will provide a significant contribution to the region's **resilience and our ability to adapt to a changing climate**. Urban centres will be vibrant and characterized by more compact development patterns that support climate change mitigation and adaptation, and provide a **diversity of opportunities for living, working, and enjoying culture**.

- Guiding principles: Support the achievement of **complete communities** that are designed to **support healthy and active living** and meet people's needs for daily living throughout an entire lifetime; **Integrate climate change considerations** into planning and managing growth such as planning for more resilient communities and infrastructure – that are adaptive to the impacts of a changing climate – and moving towards **environmentally sustainable communities** by incorporating approaches to reduce greenhouse gas emissions; Support a range and mix of housing options, including additional residential units and **affordable housing**, to serve all sizes, incomes, and ages of households; Prioritize **intensification** and higher densities in strategic growth areas to make efficient use of land and infrastructure and support transit viability.

In closing, OPHA would like to draw attention again to the historic commitment made by the signing of the Kunming-Montreal Global Biodiversity Framework on December 19th, 2022, where countries around the world have recognized the damage inflicted by development, habitat loss, pollution and climate change to our natural ecosystems on which we depend, and have committed to environmental protection. The Government of Ontario has an important opportunity now to join leaders across the globe in echoing this commitment and setting an example by enshrining biodiversity protection for current and future generations in the new integrated province-wide planning policy instrument.

Thank you for considering our concerns and recommendations with respect to the review of *A Place to Grow* and Provincial Policy Statement as outlined in ERO 019-6177. 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,



John Atkinson
Executive Director
Ontario Public Health Association

Appendix A

Excerpts from Ontario Public Health Association, October 19, 2019. Submission to the Ontario Ministry of Municipal Affairs and Housing RE: Consultation on Provincial Policy Statement Review: Proposed Policies.
<https://opha.on.ca/wp-content/uploads/2020/09/OPHA-Submission-on-PPS-Review-Oct-21-2019.pdf?ext=pdf>

Climate change mitigation and adaptation: integrate language that speaks to climate change mitigation and adaptation; a language that defines and incorporates climate-related health risks and climate resiliency, and supports working with the public health sector to identify and address the health hazards associated with a changing climate.,

Affordable and accessible housing: strengthening policies to promote the availability of affordable, safe and accessible housing in order to address the growing housing crisis in Ontario; fast tracking applications for developments that are affordable for those living with lower incomes as providing healthy, safe, accessible, and affordable housing units improves overall quality of life and contributes to better health, particularly for marginalized populations.

Land use planning supportive for all modes of transportation: We equally support the vision statements and policies promoting housing being close to transportation networks and we recommend that these be retained in the final amendments to the PPS. Connecting roads, active transportation infrastructure and public transit systems is a necessity for a healthy, complete community.

Engagement with Indigenous communities: Finally, we recommend that policy guidelines be developed for consultations with Indigenous (First Nations, Métis, and Inuit) communities. These guidelines should include a provincial responsibility to acquire consent from these Indigenous groups on land use issues.

Natural hazards

- Add requirements to mitigate the effects of extreme heat to protect the public. This is due to the projected increase in extreme heat days in the future, which could lead to greater illnesses and death.
- Add clarity around health risks [of natural hazards], phrased as follows: “may increase risk, including health risks, associated with natural hazards”.
- Include climate-related natural hazards in the definition of “natural hazards,” for example: extreme heat events, extreme weather events including severe wind storms, rainfall events, and winter storms.”

Housing

Include a clause [in supporting increased housing supply] to fast-track applications for developments that are affordable for those living with lower incomes as well as projects that support climate adaptive and mitigative sustainable design to promote healthy, inclusive communities. In addition, add a clause to fast-track developments willing to include facilities and programming that promote community building and social inclusion.

[OPHA] Responses to Feedback Questions on Proposed Changes to the PPS

1. Do the proposed policies effectively support goals related to increasing housing supply, creating and maintaining jobs, and red tape reduction while continuing to protect the environment, farmland, and public health safety?

Red tape reduction through timely and streamlined process to support housing and job-related growth and development should not come at the expense of environmental or public health and safety guidelines, standards or regulations that:

- Protect and promote health through better air quality, protected drinking water supplies, reduced urban heat islands, mitigation of vector-borne diseases, and increased climate resiliency, physical activity, and general well-being.
- Support the development of compact, complete, mixed-use, connected, and transit supporting communities as well as preventing encroachment on natural areas and agricultural lands.

Greater efficiency of development approvals could expedite housing projects and reduce costs. However, negative public health safety impacts could increase if the necessary regulations are weakened. Furthermore, barriers to affordable housing go beyond red tape and housing market supply. Other multilevel mechanisms that could be considered to promote safe and affordable housing include; strengthening inclusionary zoning regulations, increasing funding for affordable housing, promoting the development compact and high-density communities, and incentivizing developers to partner with health and social agencies to meet the needs of the community.

2. Do the proposed policies strike the right balance? Why or why not?

Consideration of the natural environment in planning decisions needs to ensure natural heritage systems are given equal weight to other planning considerations. Natural heritage areas contribute to carbon sequestration and storage, and help combat climate change impacts by providing natural shade, addressing urban heat islands, and buffering against the damaging effects of flooding during storm surges.

The concepts of climate change adaptation, mitigation, vulnerabilities and climate resiliency should be reflected throughout the PPS to show consideration of the importance of these issues.

Individuals experience climate change differently; certain individuals or sub-groups may be more vulnerable to climate change. In preparing for climate change (1.8.1), planning authorities should strive to promote climate resiliency, especially those more vulnerable to the impacts of climate change (e.g., children, seniors, low income populations) by ensuring that land use and development patterns minimize exposure to climate hazards. (Reference: <https://www.wellesleyinstitute.com/wp-content/uploads/2018/06/Cities-Climate-Change-Health-Equity-WIJune-2018-fv.pdf>)

3. How do these policies take into consideration the views of Ontario communities?

Building healthy, complete and resilient communities that meet the needs of communities includes the importance of providing parks and greenspaces. It is recommended that the definition of “public service facilities” is expanded to include parks. In addition, ensure that the PPS balances the need for providing housing with the importance of parkland provision, especially in consideration of implementation tools associated with Bill 108 and the new community benefits charges that will be informed by the PPS.

The PPS must ensure that communities are designed and built to be climate resilient and protect Ontarians from climate related health impacts. According to public opinion research conducted by the University of Montreal, the majority of Ontarians feel that their province has already felt negative effects of climate change and they support action to mitigate climate change. <https://www.umontreal.ca/climat/engl/overview.html>

4. Are there any other policy changes that are needed to support key priorities for housing, job creation, and streamlining of development approvals?

The non-profit community agency sector has a role in supporting current and future residents to fulfill employment and housing needs. The role of the non-profit community sector could be more explicit in the areas of housing (i.e., 1.4.3.c), waste management and agricultural resources (i.e., support local food and agri-food network).

5. Are there any other tools that are needed to help implement the proposed policies?

A participatory approach for public consultation that involves individuals who may otherwise be excluded from decision-making will help ensure that land use plans promote health for all, rather than further worsening existing health disparities. We recommend the Planning Act include strengthened public consultation language in order to promote spaces and settings that are designed to meet people's needs. Involving community members in setting priorities for planning can contribute to project success and the adoption of a health equity lens.

Remove recently imposed limits on application of inclusionary zoning provisions and restore municipal flexibility in determining where to apply inclusionary zoning requirements.

The changes proposed to the PPS provide increased flexibility. We recommend the existing guidance documents be strengthened in order to provide greater clarity of the provincial interest and reduce the likelihood of unintended negative consequences, including an increase in appeals.

We suggest requiring municipalities to adopt Health Impact Assessment (HIA) tool policies in their Official Plans. HIA language should hence be introduced in the PPS to ensure their integration and use throughout the planning process.

Make planners aware of the HIA tool which can be required of new development application in order to benefits and identify ways to mitigate negative outcomes for the development of complete communities. Develop clear policy guidelines for meaningful consultation with First Nation governments and urban Indigenous stakeholders.

Standardize vulnerability assessment tools for municipalities and key sectors to determine climate change risks and opportunities, including health risk and health co-benefits of climate action. One of the actions outlined in the Made-in-Ontario Environment Plan identifies that the province will: "Undertake a provincial impact assessment to identify where and how climate change is likely to impact Ontario's communities, critical infrastructure, economies and natural environment. The assessment would provide risk-based evidence to government, municipalities, businesses, Indigenous communities and Ontarians and guide future decision making." It is urgent that the provincial vulnerability assessment be completed as quickly as possible

to ensure that impacts to key sectors and to population health can be incorporated into provincial planning policies, local official plans and other land use planning documents.

The following tools would be valuable supplements to the proposed policies and land-use planning processes in order to minimize unintended negative outcomes and improve population health and health equity:

- Health Equity Impact Assessment; Health Equity Audits; Urban Health Equity Assessment and Response Tool; The Ontario Climate Change and Health Toolkit: Health Vulnerability and Adaptation Assessment Guidelines; Greenspace and EcoHealth Toolkit: Improving Health and Well-being through Greenspace Provision, Design and Access; Healthy Built Environment Linkages Toolkit

Excerpts from OPHA's Submission January 28, 2019, the previous Government of Ontario consultation on the Submission to the Ontario Ministry of Environment, Conservation and Parks: Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan <https://opha.on.ca/wp-content/uploads/2020/09/OPHA-Response-Environment-Plan-Final-Jan-28-2019.pdf?ext=pdf>

- Climate change is one of the greatest public health challenges of our time and it is imperative to act now. Taking action to mitigate and adapt to climate change can result in multiple co- benefits to our health, improve our air quality, protect our environment and strengthen our economy. Strong climate change policy, putting in place strong emission reduction targets, investing in research on impacts and climate change solutions, and supporting vulnerable populations will ensure that Ontarians are prepared for climate change today and in the future.
- Strong environmental assessment legislation is needed to ensure that any development proposal, whether an industrial facility, a municipal operation, a transportation project or waste disposal facilities does not negatively impact human health and the environment.
- Priority must be given to ecosystem protection and consideration of environmental impacts so that development, climate change and other forces do not cause irreparable harm to natural systems that are vital to human health. The integrity and health of these ecosystems is under threat from climate change and extreme weather events.
- **OPHA urges** the government to set stronger targets than those outlined in the Plan, to help limit global warming. To realize substantial co- benefits in terms of improved health, a growing economy and a healthier environment,
- As identified in the Environment Plan's actions under Supporting Resilience of Natural Ecosystems, it is important to conserve natural resources and protect people and property from flooding and natural hazards. For this reason, OPHA urges the Ontario Government not to weaken environmental assessment requirements. OPHA agrees with efforts to coordinate land use planning and EA approval processes, and to help municipalities avoid the impacts of conflicting land use. Healthy people rely on healthy ecosystems, so the priority must be on ecosystem protection and consideration of environmental impacts so that development does not cause irreparable harm to natural systems.

ⁱ Ontario Public Health Association. November 16, 2022. Submission to the Legislative Assembly of Ontario, Standing Committee on Heritage, Infrastructure and Cultural Policy. RE: Bill 23, More Homes Built Faster Act, 2022. https://opha.on.ca/wp-content/uploads/2022/11/Ontario-Public-Health-Assn-submission-to-the-Standing-Committee-on-Heritage-Infrastructure-and-Cultural-Policy_Bill-23_Nov_2022.pdf?ext=pdf

ⁱⁱ <https://www.unep.org/news-and-stories/statements/adoption-kunming-montreal-global-biodiversity-framework-gbf>

ⁱⁱⁱ Page 34, Ontario Public Health Standards, 2021

https://www.health.gov.on.ca/en/pro/programs/publichealth/oph_standards/docs/protocols_guidelines/Ontario_Public_Health_Standards_2021.pdf

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- ^{vi} <https://www.ontario.ca/page/made-in-ontario-environment-plan>
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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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