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Sent by email to: [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)

**RE: ERO 019-6813 – Review of proposed policies adapted from 'A Place to Grow' and 'Provincial Policy Statement' to form a new provincial planning policy instrument**

The Ontario Public Health Association (OPHA) is submitting the following comments and recommendations as part of ERO 019-6813: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument. OPHA has significant concerns about the health impacts that will result from the new proposed Provincial Planning Statement (PPS). While we agree that the province is amid a housing crisis, the solution to this housing crisis should not come at the expense of the health and well-being of current and future residents of Ontario.

OPHA agrees that Ontario must find more affordable housing opportunities for its residents and create healthy, equitable and climate-resilient communities. As noted in the proposed PPS, its intent is to provide policy direction for *“appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural and built environment.”* Health is heavily influenced by land use and transportation planning decisions. As such, it is vital that updates to provincial policies, plans and legislation maintain direction to promote healthy communities<sup>1</sup> and reduce the risk of inadvertent harms and inequities.

As noted in our December 23<sup>rd</sup>, 2022 comments on [ERO 019-6177 – Review of A Place to Grow and Provincial Policy Statement](#), **OPHA urges the province to reintegrate principles, vision, and policy statements contained within the current PPS and A Place to Grow (APTG)** that value and prioritize population health, health equity and climate resiliency in community, land use and transportation planning. The proposed PPS has removed many healthy community components, and the acknowledgement that *“human and environmental health and social well-being*

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<sup>1</sup> 'Healthy Communities' is defined by the Canadian Institute of Planners' [Policy on Healthy Communities Planning](#) as “a place where healthy built, social, economic, and natural environments give citizens the opportunity to live to their full potential, regardless of their socially, culturally, or economically defined circumstances.”

*should take precedence over short-term considerations".* Without these components, the proposed PPS is taking many steps backward from advancing development that promotes and protects the health and well-being of Ontarians.

**In any proposed changes to the PPS, OPHA urges the province to include policies that:**

1. Reintegrate health and well-being concepts in the Vision and in Chapter 2, "Building Homes, Sustaining Strong and Competitive Communities", with the goal of creating healthy communities that enable people to thrive
2. Strengthen policies that will help communities mitigate greenhouse gas emissions and adapt to climate change
3. Integrate affordability targets for low- and moderate-income households to support equity and promote housing affordability for all
4. Mitigate exposure to incompatible land uses and harmful levels of pollution
5. Prevent unsustainable urban expansion and fragmentation of agricultural lands
6. Strengthen protections and enhance natural heritage features in recognition of the vital function of ecosystem services for health, well-being and climate-resiliency

These policy recommendations are detailed below:

- 1. Reintegrate concepts of health and well-being, in the Vision and Chapter 2, "Building Homes, Sustaining Strong and Competitive Communities" with the goal of creating healthy communities that enable people to thrive.**

**OPHA recommends** re-integrating the concept of health as a key driver for promoting strong and competitive communities.

- Integrate health and well-being into the narrative and the Vision
- Reintegrate health in the title of chapter 2
- Reintegrate health and well-being and the land use elements that support it in the policy direction of 2.1 (4)
- Add "health and resiliency" to the definition of Complete Communities
- The Vision should include the public health sector in the list government agencies working together to help identify and address the health hazards associated with climate change

In the mid-1800's, huge advances were made in the prevention of communicable diseases through the modification of the built environment, resulting in the rise of the disciplines of public health and urban planning. Today, our communities are faced with significant health challenges that cost our societies dearly, including alarming rates of chronic diseases, injuries, mental health issues, food insecurity, and substance use. This has resulted in increased incidences of diabetes, cardiovascular disease, cancer, osteoporosis and poor mental health. Air pollutants from motor vehicle emissions and other sources also cause chronic diseases, including diseases of the lungs and heart and some cancers.

Furthermore, climate-related health risks are increasingly impacting the health and well-being of all Ontarians – disproportionately affecting our most vulnerable populations. These are all population health issues impacted by the built environment. As such, health considerations must continue to be integrated into

land use planning in Ontario, fostering the health and well-being of all people. Without a healthy and strong population, the economic prosperity and social well-being of Ontario is in jeopardy.

It is for these reasons the **OPHA urges the province to revert to the 2020 PPS language and include broader concepts of health and well-being in the new proposed PPS.** Removing “Healthy Communities” as a keystone in the Vision for how Ontario will grow could result in planning practices that do not prioritize health and well-being of all residents. This in turn will impact the intended success of the proposed PPS and Ontario’s economy by negatively affecting the health of the workforce, which then places more burden on the health care system due to the higher rates of injury, illness, and disease.

Furthermore, the 2020 PPS refers to health beyond addressing hazards by incorporating language that recognizes the many ways in which the built environment affects Ontarians’ health and well-being. The new proposed PPS removes important policy language that recognizes the strong link between land use planning and health outcomes. By removing this language, the proposed PPS presents a contradiction to directives that are given to local public health units through the Ontario Public Health Standards Requirements for Programs, Services and Accountability, to “reduce exposure to health hazards and promote the development of healthy built and natural environments that support health...”.

## **2. Strengthen policies that will help communities mitigate greenhouse gas emissions and adapt to climate change**

Strong and effective land use planning policies are needed to speed up progress on reducing greenhouse gas emissions and help communities adapt to the present and future risks of climate change.

**OPHA recommends** the government:

- Recognize climate change mitigation and adaptation as key considerations in land use planning by including climate change in other policy areas, including transportation, infrastructure and facilities, water, stormwater management and agriculture
- Expand policy direction in natural and human-made hazards to include public health and safety related to all climate-related natural hazards, not just flooding (i.e., extreme weather events, extreme heat, extreme windstorms, drought, wildfires, etc.)

Climate change is the largest health threat facing people in Ontario and around the world. The urgency for action in all sectors to both mitigate and adapt to climate change goes beyond “balancing housing with resources” and developing “approaches” to reduce greenhouse gas emissions.

**OPHA urges the province to enact land use, growth and transportation planning policies that will balance development needs with the urgent need to take action on climate change.** Strengthening climate-resiliency policies in the new proposed PPS is vital to avoid additional disastrous consequences of climate impacts to our communities, our health, our environment, and our economy.

The positioning of “Energy Conservation, Air Quality and Climate Change” as a section within Chapter 2 in the proposed new PPS is a weakened version of climate change policy in the 2020 PPS and APTG. The proposed PPS removes several important references to climate change. Policy direction has weakened, for example, from “...shall support energy conservation and efficiency, improved air quality, reduced greenhouse

*gas emissions and preparing for the impacts of a changing climate...” to “...take into consideration approaches that help reduce greenhouse gas emissions...”*

Climate change adaptation, mitigation, vulnerabilities, and increased resiliency must be reflected throughout the new proposed PPS with strong policy language to show the importance of these issues across multiple aspects of land use planning. This includes factoring climate-related risks and impacts into policies related to infrastructure, development decisions, transportation, water, wastewater and stormwater management and agriculture. Climate change policies cannot be standalone.

**OPHA urges the province to fulfill its commitments from the 2018 Made-in-Ontario Environment Plan to address climate change, and to speed up progress to reduce greenhouse gas emissions.** This can be partly achieved by strong and effective land use and transportation policies that address the primary sources of carbon pollution in Ontario – transportation, buildings and industry.

### **3. Integrate affordability targets for low- and moderate-income households to support equity and promote housing affordability for all**

**OPHA recommends** the government:

- Reintroduce the requirement to set minimum targets for the provision of affordable housing for both low- and moderate-income households and re-connect these requirements to local housing and homelessness plans

Housing affects physical, mental and social health and well-being, and it is a key determinant of health. Housing should be affordable, safe and accessible. Poor housing quality is associated with chronic illnesses, injuries, poor nutrition, and mental illnesses. Good quality, secure housing is very important for addressing many of these health challenges.

By removing the language that requires setting of affordability targets for low and-moderate income households and aligning with homelessness plans, municipalities’ ability to tackle the growing housing crisis is compromised. Municipalities’ obligations and responsibilities to address housing affordability issues are also reduced.

People living on a low income are unfairly affected by the health impacts of unaffordable housing options. Affordability targets for low and moderate-income households are essential for creating healthier communities by reducing financial stress, providing stability, improving housing conditions, fostering social connections, and promoting health equity.

The economic benefits of equity translate into reduced demands on the health and social services sectors. Affordable housing can also support employee recruitment, productivity and retention, benefitting businesses and a community’s economy.

### **4. Mitigate exposure to incompatible land uses and to harmful levels of pollution**

**OPHA recommends** the government:

- Reinstate the policy requirements for the proponent of sensitive land uses to demonstrate the need or evaluate alternative locations for sensitive land uses where avoidance of adverse effects is not possible
- Reinstate the policy reference to adverse effects to the proposed sensitive land use being minimized and mitigated
- Strengthen the policy to improve public health protective measures by requiring appropriate separations where necessitated

The proposed PPS removes the requirement for the proponent of sensitive land uses to demonstrate the need or evaluate alternative locations for sensitive land uses where avoidance of adverse effects is not possible. The proposed PPS removes reference to minimizing and mitigating adverse effects to a proposed sensitive land use, revealing a greater focus on protecting the long-term viability of industrial and manufacturing uses, as well as major facilities.

**OPHA recommends reinstating the policy requirement for the proponent of sensitive land uses to demonstrate the need or evaluate alternative locations for sensitive land uses where avoidance of adverse effects is not possible, as well as the policy reference to adverse effects to the proposed sensitive land use being minimized and mitigated.**

It is essential that the potential health concerns related to land use compatibility pertaining to major facilities and sensitive land uses be planned and developed to avoid, minimize and mitigate any potential adverse effects from odour, air pollutants, noise and other contaminants.

A Health Impact Assessment approach should be considered where feasible. A Health Impact Assessment can be an objective, transparent and consistent framework and methodology for assessing the public health impacts of planned development projects. This practice should be encouraged from the provincial level, while ensuring that municipalities have the flexibility to adopt their own definitions and processes for Health Impact Assessment.

## **5. Prevent unsustainable urban expansion and fragmentation of agricultural lands**

**OPHA recommends** the government:

- Ensure urban expansion is the result of a thoughtful, municipally-led planned approach that will result in the development of healthy, resilient and complete communities including:
  - Reinstatement of previous policy 1.1.3.8 and associated policies that support municipally-led growth strategies
  - Re-introduction of policies that bring back the “shall” to directing growth to growth areas
- Amend policy 4.3.2 to reduce fragmentation and inefficient land use patterns and the erosion of agricultural lands
  - Severances of farm properties to allow for additional residence on a parcel will increase fragmentation of agricultural lands, introduce incompatibilities with agricultural operations, and reduce food security in Ontario

**OPHA is concerned** with the lack of policy language in the proposed new PPS that would protect communities from inefficient, uncoordinated and discontinuous growth. In particular, if the proposed PPS takes effect, municipalities will no longer be required to define settlement boundaries with set density targets to guide growth. Additionally, rural settlement areas will no longer be the focus of rural development due to the permitting of new lots on agricultural and rural zoned lands.

These types of land use policies are counter to the complete and healthy communities planning approach that has been recommended in peer-reviewed research evidence for decades.

In addition, **OPHA is concerned** by the shift in policy language to allow for rural lot creation and severances. Allowing rural lot creation and severances on prime agricultural land will encourage inefficient land use patterns outside of settlement areas, including promoting the creation of small hamlets without services or access to amenities.

If this policy change goes forward, it will compromise the viability of agricultural operations, food security, and the local food system as a whole. More critically, prime agricultural lands are a finite resource. Once these lands are removed from agricultural production it is extremely difficult to return them to a productive state. A decline in the acreage of food production land, coupled with a reduction in the number of farmers entering the agricultural sector has the potential to cause significant disruption to the province's food system and economic prosperity.

Simply put, **growth must be directed to settlement areas**. When this happens, the agricultural sector, small towns, and the people who live in small towns all benefit. When housing can be serviced by municipal infrastructure, there is a much smaller land parcel required. Additionally, small towns, which are fuelled by locally owned businesses, need a solid population base to keep the local economy thriving. By keeping growth in settlement areas, farmland is not lost, the ability to grow food is maintained, and potential land use conflicts are significantly reduced.

Responsible land use planning is a critical balance of many factors. However, if land use policy is skewed to favour one factor over another (e.g., housing prioritized over land for food production), then all other factors will be depleted, and communities, the residents who live there and ultimately the whole province will suffer.

## **6. Strengthen protections and enhance natural heritage features in recognition of the vital function of ecosystem services for health, well-being and climate resiliency**

**OPHA recommends** the government:

- Retain and strengthen natural heritage, biodiversity, greenspace and green infrastructure policies, by incorporating policies from APTG Chapter 4: *Protecting What is Valuable*, including “policies to maintain, restore, or enhance the diversity and connectivity of the [natural heritage] system and the long-term ecological or hydrologic functions of the features and areas”
- Retain the language from chapter 2 of the current PPS: “Ontario's long-term prosperity, environmental health, and social well-being depend on conserving biodiversity, protecting the health of the Great Lakes, and protecting natural heritage, water, agricultural, mineral and cultural heritage and archaeological resources for their economic, environmental and social benefits”
- Maintain the oversight role of the Ministry of Natural Resources and Forestry in evaluating natural heritage features

**OPHA is concerned** that while the proposed PPS retains policies from the existing PPS, it omits much of the natural heritage policies from APTG that are vital and applicable for healthy ecosystems across all of Ontario. 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.

**OPHA is also concerned** that changes to the definition of “significant” regarding “*wetlands, coastal wetlands and areas of natural and scientific interest*” removes the oversight role of the Ontario Ministry of Natural Resources and Forestry in evaluating these natural heritage features and ensuring their protection from development and site alteration.

Nature provides innumerable benefits to our health and well-being and in protecting communities from climate-related health risks. Natural ecosystems are facing risks – including development pressures and climate change. Disruption of essential natural ecosystem services reduces their ability to provide local sources of nutritious food, to control climate-related health impacts including flooding, extreme heat and other extreme weather events, to mitigate climate change, and to support equitable access to nature.

While we have little control over the frequency and severity of climate-related extreme weather events and risks, we have significant control over development pressures that threaten the essential functions of ecosystems including wetlands, woodlots and other natural wildlife habitats. Integrated land use planning, environmental protection and natural heritage policies are the means by which we can preserve and enhance the ecosystem functions on which all Ontarians depend.

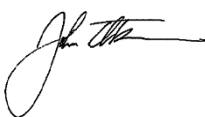
Overall, greater consideration of health impacts and inequities must be incorporated into planning and decision-making processes and streamlining of provincial planning direction should not be at the expense of the health and well-being of Ontarians. Effective planning policies can protect and promote health by improving air quality, protecting drinking water, reducing urban heat islands, and building community climate resiliency.

In addition, communities that are developed with health in mind will promote physical activity and healthy eating, improve mental health, and reduce chronic diseases. In turn, healthy communities will reduce demands on the health care system and foster the economic vitality of Ontario. A healthy, thriving population and economy depend on healthy, thriving people.

We welcome the opportunity to meet with the government to discuss the proposed changes and solutions that address concerns related to this proposed legislative changes.

Please refer to OPHA’s detailed analysis of ERO 019-6813 – Review of proposed policies adapted from ‘A Place to Grow’ and ‘Provincial Policy Statement’ to form a new provincial planning policy instrument (Appendix A).

Sincerely,



John Atkinson  
Executive Director  
The Ontario Public Health Association

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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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## Appendix A: Ontario Public Health Association’s Analysis of ERO 019-6813 – Proposed Provincial Planning Statement (July, 2023)

Section	Issue	Health Impact	Recommendations
	<p>Our communities are faced with significant health challenges that cost our societies dearly, including alarming rates of chronic diseases, injuries, mental health issues, food insecurity, and substance use. This has resulted in increased incidences of diabetes, cardiovascular disease, cancer, osteoporosis and poor mental health. Air pollutants from motor vehicle emissions also cause chronic diseases, including diseases of the lungs and heart and some cancers. Furthermore, climate-related health risks are increasingly impacting the health and well-being of all Ontarians – disproportionately affecting our most vulnerable populations. These are all population health issues impacted by the built environment.</p> <p>As such, health considerations must continue to be integrated into land use planning in Ontario, fostering the health and wellbeing of all people. Without a healthy and strong population, the economic prosperity and social well-being of Ontario is in jeopardy.</p>	<p>Healthy communities = healthy economy = less pressure on health care system</p> <p>For additional context, see previous PPS submission: <a href="https://www.opha.on.ca/standing-committee-on-heritage-infrastructure-and-cultural-policy-bill-23-nov-2022.pdf">Ontario-Public-Health-Assn-submission-to-the-Standing-Committee-on-Heritage-Infrastructure-and-Cultural-Policy Bill-23 Nov 2022.pdf (opha.on.ca)</a></p> <p>The built environment, where people live, work and visit, determines the health of Ontarians. Having convenient, appealing and safe walking-friendly communities with mixed residential and commercial destinations, can help people stay active and healthy, reduce the risk and improve the management of chronic diseases like diabetes or heart disease, and reduce the burden on the health care system. Having locally grown foods can lower transport-related emissions with fewer food miles, preserve food quality and safety, and support the economy through farming. Designing communities and buildings that protect people from unhealthy exposures to traffic-related air pollution, extreme heat and climate-related health risks reduces acute and chronic diseases. Environmental protection measures provide multiple and equitable health benefits. Keeping people healthy and well contributes to the sustainability of the health care system and supports a growing economy.</p>	<p>Retain principles, vision, and policy statements contained within the current Provincial Policy Statement (PPS) and A Place to Grow (APTG) that value and prioritize population health, health equity and climate resiliency in community, land-use and transportation planning.</p> <p>Revert to the 2020 PPS language and include broader concepts of health and wellbeing in the new proposed PPS. Removing “Healthy Communities” as a keystone in the vision for how Ontario will grow could result in planning practices that do not prioritize health and wellbeing of all residents. This in turn has the potential to impact the intended success of the PPS and Ontario’s economy by limiting the abilities of the workforce, which in turn places more burden on the health care system due to the higher rates of injury, illness, and disease.</p>
Chapter 1: How to Read this Policy Statement	In the first sentence of this section, health is missing from the complex inter-relationships among factors in land use planning.	The published peer-reviewed <a href="#">literature</a> on the connection between health and the built environment is clear. Integrating health in the list of factors in land-use planning supports a more comprehensive consideration of factors required to create the conditions for the population, communities, and the economy to thrive, as impacted by land use planning.	Insert “health” so that the first sentence reads: “The provincial policy-led planning system recognizes and addresses the complex inter-relationships between “health” and the environmental, economic, and social factors in land use planning.”
Chapter 1: Vision	<p>The updated PPS has removed references to healthy communities in the vision.</p> <p>The expanded focus on planning for complete communities for all ages, abilities and incomes, recognizing the needs of equity-deserving groups, is</p>	Health and well-being are prerequisites for a healthy and thriving economy. Lack of inclusion of healthy communities, and health and well-being as a cornerstone in the vision for how Ontario grows, limits our collective ability to ensure growth takes population health and well-being into account.	Reintegrate the concept of health and well-being as key drivers and dimensions for the evolution of complete communities into the vision.

**Appendix A: Ontario Public Health Association’s Analysis of ERO 019-6813 – Proposed Provincial Planning Statement (July, 2023)**

Section	Issue	Health Impact	Recommendations
	<p>a positive addition. However, land use tools such as planning for complete communities that meet the needs of all, including addressing the needs of equity deserving groups, are ultimately intended to promote healthy communities that support quality of life and well-being. Thus, the current reference to health should be beyond health hazards, to recognize the many impacts of the built environment on health and well-being outcomes. .</p>	<p>From the PPS, 2020 Vision:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p><b>From the A Place to Grow Plan Vision:</b></p> <ul style="list-style-type: none"> <li>• 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. .... 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,...</li> </ul>	<p>Retain vision statements from the 2020 PPS that prioritize population health, health equity and climate resiliency.</p> <p>Add “health” under “How to Read this Policy Statement” as follows:</p> <p>The provincial policy-led planning system recognizes and addresses the complex interrelationships among environmental, economic, “health” and social factors in land use planning.</p> <p>Retain the language on conserving biodiversity, and protecting essential ecological processes in the Vision statement. This is essential for all areas of the province, not only in rural areas in municipalities.</p> <p>Incorporate the concept of 15-minute neighbourhoods, which contain the elements required to support health and well-being</p>
<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities</p>	<p>Removal of the concept of “health” from the title of chapter two and in the supporting policy narrative, disconnects the importance of health and well-being in developing a strong and competitive community with sufficient homes. Sufficient and affordable housing has direct impacts on health outcomes. A healthy population provides the engine for economic growth and competitive communities, as evidenced during the COVID-19 pandemic.</p>	<p>Removing recognition of health as a key determinant for a complete community reduces abilities of planning decisions to consider health and well-being in the deliberation of planning policies and decisions; this is despite the built environment being a significant driver of health outcomes. This is also in contradiction to directives to Ontario Boards of Health, through the <a href="#">Ontario Public Health Standards Requirements for Programs, Services and Accountability</a>. “To reduce exposure to health hazards and promote the development of healthy built and natural environments that support health...”.</p>	<p>Reintegrate health in the title and policy directions of 2.1</p>

**Appendix A: Ontario Public Health Association’s Analysis of ERO 019-6813 – Proposed Provincial Planning Statement (July, 2023)**

Section	Issue	Health Impact	Recommendations
2.1 (2a)	Removal of language related to intensification waters down the encouragement of growth through more sustainable and climate resilient approaches and focuses instead on greenfield development.	Lack of focus on intensification will reduce the evolution of places into more healthy, equitable and complete communities that support walkability, mitigate the impacts of climate change and reduce greenhouse gas emissions.	Reinstate the policy objective to encourage intensification.
2.1 (4)	Removal of original policy 1.1.1 “Healthy, livable and safe communities....” has resulted in a deletion from the PPS of what a healthy and livable community entails and how it can be achieved.	The <a href="#">international research</a> identifying the health impacts of the built environment are significant, and land-use planning is a critical means for promoting positive health and well-being, and community resiliency, all of which are crucial in supporting strong and competitive communities.	<p>Reintegrate the concept of health and well-being, and the land use elements that support it. Reintegrate the ties between healthy communities, resiliency, and a thriving economy. Reintegrate the means by which “healthy, liveable and safe communities are sustained”, as outlined in section 1.1.1 of the current PPS, not least of which include:</p> <ul style="list-style-type: none"> <li>● Avoiding development and land use patterns which may cause environment or public health and safety concerns</li> <li>● Promoting development and land use patterns that conserve biodiversity</li> <li>● Preparing for the regional and local impacts of a changing climate.</li> </ul>
2.1 (4)	Throughout the new proposed PPS, the policy language has been weakened to encourage the development of complete communities, as opposed to requiring this type of development.	Complete Communities are not just a nice to have, they are a must have because they are communities that are built to meet the needs of the residents living in them. Complete communities have been shown to reduce travel and auto-dependent behaviour, have lower greenhouse gas emissions per capita than sprawled communities, give a range of housing types and tenures, have access to healthy foods, jobs, schools, health care, parks, and other important services. As a result, residents who live in complete communities often have a stronger sense of community and more opportunities to interact, which in turn fosters social inclusion and positive mental health.	Change the language to: “Planning authorities shall support the achievement of complete communities,…”
2.2 (1 a) Housing	Removal of language requiring establishment of affordability targets for low- and moderate-income households, and removing alignment with homelessness plans, compromises municipalities’ abilities, and reduces their requirements, to address the escalating housing crisis.	Lack of housing has direct impacts on health and well-being. Housing is a social determinant of health, and without it, it is impossible to thrive. In addition, lack of housing translates into significant costs to the health and social services sectors.	Reintroduce the requirement to set minimum targets for the provision of affordable housing for both low and moderate income households and re-connect these requirements to local housing and homelessness plans.

**Appendix A: Ontario Public Health Association’s Analysis of ERO 019-6813 – Proposed Provincial Planning Statement (July, 2023)**

Section	Issue	Health Impact	Recommendations
	<p>Removal of the definition of affordable housing increases the risk of housing unaffordability for a greater proportion of the population (see comments below – Section 7 – Definitions)</p> <p>Sustainable, low-carbon and climate resilient housing are important components of community planning policies. The proposed PPS makes no mention of sustainable housing in terms of energy efficiency and climate resiliency.</p>	<p>The root cause of the housing crisis in Ontario is affordability. Housing affordability is a significant determinant of health for a large segment of the Ontario population.</p> <p>Climate mitigation efforts related to building energy efficiency can improve population health by way of cleaner air, improved housing standards and protection from climate-related health risks including extreme heat.</p>	<p>Incorporate sustainable, energy efficient and climate resilient building requirements into section 2.2 - Housing and section 2.9 - Energy Conservation, Air Quality and Climate Change.</p>
2.3 (2) Settlement Areas & Settlement Area Boundary Expansion	<p>Removal of word “<u>shall</u>” and replacing with “<u>should</u>” be based on densities and a mix of land uses...” reduces clear policy directives to encourage densities that, in turn, provide the critical mass of people needed to support complete communities.</p> <p>Removal of climate change and energy efficiency also disconnects these goals with from the important role that density plays in facilitating these outcomes.</p>	<p>Healthy, walkable and climate resilient complete communities with a robust local economy rely on a critical mass of people to make those land uses viable. This in turn leads to positive health outcomes. <a href="#">Research</a> indicates sufficient densities must be achieved in order to accrue health benefits and positive health outcomes.</p>	<p>Reintroduce requirement to “<u>shall</u> be based on densities...”</p>
2.3 (3)	<p>Removal of minimum density targets (policy 1.1.3.5 in current PPS) and the requirement for intensification in settlement areas (change from “<u>shall</u> establish and implement minimum targets for intensification” to “<u>should</u> support general intensification and redevelopment”) weakens policy direction that support health, equity, climate-resiliency and economic vitality of communities.</p>	<p>Removal of minimum density targets and requirements for intensification in settlement areas is counter to healthy, equitable, climate-resilient and economically sustainable communities.</p>	<p>Retain current PPS policy statement 1.1.3.5 “Planning authorities <u>shall</u> establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions. However, where provincial targets are established through provincial plans, the provincial target <u>shall</u> represent the minimum target for affected areas</p>
2.3 (4)	<p>Removal of original policy 1.1.3.8 which required a comprehensive review to expand settlement boundary areas to demonstrate need will result in inefficient, uncoordinated and discontinuous growth that compromises the ability of municipalities to ensure growth happens in a way that supports the evolution of healthy, complete communities.</p>	<p>Inefficient growth that is not supported by long-range planning will result in less walkable, more car-oriented communities that will ultimately lead to poorer health outcomes, and compromise municipalities abilities to grow in a way that supports climate resiliency and reduction of GHGs.</p> <p>The policies also reduce protections for prime agricultural areas, which will compromise long term food security.</p>	<p>Reinstate previous policy 1.1.3.8 and associated policies that support municipally-led growth strategies.</p>
2.5 (1) Rural Areas in Municipalities	<p>Removal of original policy 1.1.4.2 “In rural areas, rural settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted” reduces policy direction to</p>	<p>Ensuring growth takes place within rural settlement areas will support evolution of rural communities into healthier, more walkable communities, with growing</p>	<p>Reinstate policy to direct growth to rural settlement areas and reduce policy permissions related to multi-lot residential development on rural lands.</p>

**Appendix A: Ontario Public Health Association’s Analysis of ERO 019-6813 – Proposed Provincial Planning Statement (July, 2023)**

Section	Issue	Health Impact	Recommendations
2.6 (1 c)	<p>encourage the development of heathy, complete communities within rural settlement areas, leading to fragmented growth and inefficient development patterns.</p> <p>New policies enabling multi-lot residential development, and lack of definition of what this means, will create significant negative impacts to the viability of the agricultural sector and food security in Ontario. Enabling multi-lot development in rural areas that are not part of a rural settlement area will further enable fragmented growth.</p>	<p>critical mass to support local businesses and amenities and reduced municipal infrastructure costs.</p> <p>Current draft policies will negatively impact food security in Ontario by permanently losing valuable agricultural lands and making unviable or difficult future agricultural operations that come into conflict with new residential development. Food security is a critical dimension of the social determinants of health, and in the context of a changing climate with unknown future disruptions, maintaining viability of our local food production capacity is critical.</p>	
2.9 Energy Conservation, AQ and Climate Change	<p>The new policies in 2.9 represent a weakened version of the existing PPS and remove several important references to climate change from other sections of the PPS. The important policies from APTG section 4.2.10 (Climate Change) have not been incorporated into the proposed PPS.</p>	<p>Climate change is the greatest health challenge facing Ontarians. Climate change mitigation and adaptation measures must be reflected in policy language throughout the PPS, not just in one section. Climate change adaptation and mitigation can and must be addressed through a range of policy areas. The health impacts of climate change are significant and will continue to accelerate, including those related to flooding, extreme heat, air pollution, drought, food and water insecurity, mental health and other climate-related health risks.</p> <p>The health impacts of climate change also present a serious economic risk, reducing productivity, increasing health and social services costs, and increasing emergency response costs.</p>	<p>Amend and strengthen language as follows in 2.9:</p> <p>“Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through climate change mitigation and adaptation approaches that:</p> <p>b) Incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities and when processing development applications</p> <p>f) Incorporate climate science including provincial and local climate vulnerability assessments in preparing for the impacts of a changing climate</p> <p>Add or reinstate climate change policies and references to climate change in sections on settlement areas, infrastructure and facilities, transportation, sewage/water and stormwater, water.</p> <p>Add climate mitigation and adaptation as matters of provincial and municipal interest, acknowledging the health, environmental and economic costs of climate hazards including emergency response following climate disasters.</p>

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			Add climate change policies from APTG section 4.2.10 including requirement for municipal official plan policies to include actions to reduce greenhouse gas emissions and address climate change adaptation goals.
3 Infrastructure and Facilities	Policy 3.1 (6) to encourage innovative approaches in the design of schools and childcare facilities will have a positive impact in building more complete and integrated communities and supporting services. This policy could be strengthened by shifting language from “ <u>should</u> ” to “ <u>shall</u> .”	Schools and childcare services are essential elements of a healthy, walkable and complete community. Childcare services provide critical support to families, enabling them to participate in the economy. Quality childcare and schools are key determinants of health, providing the early years support to enable healthy growth and development.	Change wording from “ <u>should</u> ” to “ <u>shall</u> ”
3.2 Transportation Systems	The removal of policy 1.6.7.4 of the current PPS weakens municipalities’ abilities to uphold ambitious sustainable transportation policies that are made viable through the arrangement of land uses. The removed policies read “a land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation”. The viability of sustainable transportation is reduced without supporting and integrated land use patterns, density and mix of uses. The removal of this policy shifts priorities for reducing automotive trips and is in conflict with other new PPS policies related to complete communities and energy conservation, air quality and climate change.	The arrangement and density of land uses, and the transportation system it enables, are directly related to health outcomes, as established in the scientific literature. Communities that are planned to enable a multi-modal transportation system that prioritizes public and active transportation contribute to public health, improves air quality and mitigates climate change by reducing greenhouse gas emissions.  Removing this policy could lead to more urban sprawl, which in turn encourages greater use of personal automobiles. This negatively impacts health, leading to increased premature deaths from air pollution, decreased quality of life and well-being and increased health care costs.	Reinstate the current PPS policy 1.6.7.4, including reference to active transportation.
3.3 Transportation and Infrastructure Corridors	With respect to land use compatibility, while the definition of “major facilities” includes transportation infrastructure and corridors, section 3.3 makes no mention of protecting sensitive land uses.	Traffic pollution is linked to 500 premature deaths in Ontario every year. Lower socio-economic status (SES) neighbourhoods are often located closer to major roadways with higher traffic pollution than higher SES neighbourhoods. A recent Health Canada assessment found that 48% of schools were located within 200 metres of high-traffic roadways and 31% were located within 100 metres of a high-traffic roadway.	Identify that planning for land uses in the vicinity of on-road transportation corridors shall be undertaken so that sensitive land uses are appropriately designed, buffered and/or separated from each other (similar to section 3.4.)
3.5 Land Use Compatibility	In describing potential adverse effects of proposed development of major facilities and sensitive land uses, policy 3.5.1 omits the major health impact associated with major facilities including transportation systems – air pollution.	As noted above, air pollutants including traffic-related air pollutants are major contaminants of concern for Ontarians. Land-use and transportation planning policies can help reduce exposure to these air pollutants and improve population health and health equity.	Recommend rewording of policy 3.5.1 to: “Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from air pollutants, odour, noise and other contaminants as

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	<p>The proposed PPS 2023 removes the requirement for the proponent of sensitive land uses to demonstrate the need or evaluate alternative locations for sensitive land uses where avoidance of adverse effects is not possible. The proposed PPS 2023 removes reference to adverse effects to the proposed sensitive land use being minimized and mitigated, revealing a greater focus on protecting the long-term viability of industrial and manufacturing uses, as well as major facilities.</p>	<p>As noted in Public Health Ontario’s research, this can be addressed by requiring “buffer zones between major traffic arteries and homes, daycares, schools and long-term care facilities when planning land use.” <a href="#">Traffic-related Air Pollution, Environmental Burden of Cancer in Ontario</a></p> <p>Health impact assessment can be an objective and consistent method for assessing the public health impacts of planned development projects. This practice should be encouraged from the Provincial level, while ensuring that municipalities have the flexibility to adopt their own definitions and processes for health impact assessment.</p>	<p>determined by a health impact assessment or equivalent analysis, to minimize risk to public health and safety and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.”</p> <p>Strengthen the policy to improve public health protective measures by requiring appropriate separations and mitigation of impacts where necessitated.</p> <p>Incorporate language on the importance of land use and transportation policies that protect sensitive uses from traffic-related air pollution.</p> <p>Reinstate the policy requirement for the proponent of sensitive land uses to demonstrate the need or evaluate <u>alternative locations</u> for sensitive land uses where avoidance of adverse effects is not possible as well as the policy reference to adverse effects to the proposed sensitive land use <u>being minimized and mitigated</u>. It is essential that the potential health concerns related to land use compatibility related to major facilities and sensitive land uses be planned and developed to avoid, minimize and mitigate any potential adverse effects from odour, air pollutants, noise and other contaminants.</p>
<p>3.6.8 Planning for Stormwater management</p>	<p>c) Removal of “and prepare for the impacts of a changing climate”</p>	<p>Heavier precipitation events projected due to climate change should be part of stormwater management planning.</p>	<p>Reinstate wording from existing PPS (1.6.6.7c) into 3.6.8c, to acknowledge that planning for stormwater management shall also prepare for the impacts of a changing climate: “Planning for stormwater management shall: c) minimize erosion and changes in water balance and prepare for the impacts of a changing climate through the effective management of stormwater, including the use of green infrastructure.”</p>

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Chapter 4 Wise Use and Management of Resources	Removal of statement articulating the importance of protecting natural heritage, water, agriculture, and other resources for their economic, environmental and social benefit.	Natural heritage systems and biological diversity provides the vital ecosystem services on which all life depends. Healthy ecosystems support healthy people as well as a healthy economy. Nature-based solutions are key to creating and maintaining climate-resilient and economically prosperous communities.	Retain this statement from the current PPS: “Ontario’s long-term prosperity, environmental health, and social well-being depend on conserving biodiversity, protecting the health of the Great Lakes, and protecting natural heritage, water, agricultural, mineral and cultural heritage and archaeological resources for their economic, environmental and social benefits.”
4.1 Natural Heritage	While the proposed PPS retains policies from the existing PPS, it omits much of the natural heritage policies from APTG that are vital and applicable for healthy ecosystems across all of Ontario. It is important that the protection and enhancement of natural environments remain a priority in all provincial planning policies.	<p>Healthy natural ecosystems and biodiversity conservation is vital to the health and well-being of all species including humans.</p> <p>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.</p>	<p>Retain and strengthen natural heritage, biodiversity, greenspace and green infrastructure policies, by incorporating policies from APTG Chapter 4: Protecting What is Valuable, including “policies to maintain, restore, or enhance the diversity and connectivity of the [natural heritage] system and the long-term ecological or hydrologic functions of the features and areas”, for example:</p> <ul style="list-style-type: none"> <li>• Connectivity along the system</li> <li>• Requirement for natural heritage evaluations that identifies protection zones</li> <li>• Minimizing impervious surfaces</li> <li>• Maximizing natural self-sustaining vegetation</li> <li>• Open space policies based on good land stewardship practice</li> </ul>
4.1.4 to 4.1.8 Natural Heritage	Policies to protect wetlands and other natural heritage areas from development and site alteration on, or adjacent to, these significant ecological features have been weakened by changing the definition of “significant”.	Wetlands play a critical role in mitigating floods and provide valuable ecosystem services. Wetland loss may result in serious flooding, putting the safety of communities at risk. Certain natural heritage features are irreplaceable, and vital to ensuring that communities are resilient and adaptive to our changing climate.	Strengthen policies to evaluate natural heritage features that are evidence-based, increase climate resiliency and conserve biodiversity. Ensure updates to the Ontario Wetland Evaluation System prioritize health and environmental protection.
4.2.1 Water	Removal of the following requirement for planning authorities to protect water quality and quantity by: “Evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level”	Climate change is likely to impact water levels, groundwater and water quality, through flooding, drought, and heavy precipitation. This has a direct impact on public health and safety.	Reinstate policy 2.2.1c from the current PPS that identifies that planning authorities shall protect water quality and quantity by: “evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level.”



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4.3. Agriculture  4.3.1 (2)	There is a disconnect between 4.3.1 (2) "prime agricultural areas, including specialty crop areas, shall be designated and protected for long-term use for agriculture" that states these lands must be protected, yet 4.3.3 provides criteria for severances which is a direct erosion of agricultural land.	Growth must be directed to settlement areas that can provide services for housing on much smaller parcels of land. By doing so, farmland will be protected and not lost, as well as the long-term economic prosperity of the agricultural industry and local food security.	Reinstate the agricultural policies in Section 2.3 of the 2020 PPS to protect prime agricultural land and specialty crop areas.  Reinstate requirement for municipalities to have agricultural systems that define protections for Class 1 to 4 soils plus specialty crop lands. Class 5-6 soils deserve protection too, especially if there are no Class 1-4 soils present in a municipality.
4.3.3 Lot Creation and Lot Adjustments	Permitting up to 3 severances from prime agricultural land parcels could facilitate inefficient land use patterns outside of settlement areas, including promoting the creation of small hamlets without services or access to amenities. It could also compromise the viability of agricultural operations, our local food system, as well as increase conflicts from adjacent land uses that are incompatible.	A vibrant and viable agricultural system is crucial to the health of Ontarians. Currently, 5% of all land in Ontario is zoned for agriculture. Converting agricultural land to non-agricultural uses will mean a loss of land to grow food and a loss of important economic activity for Ontario. When food is grown in Ontario, communities can be more resilient and sustainable as there is less reliance on imported foods, which also reduces greenhouse gas emissions from the shipping.	Reinstate the agricultural policies in Section 2.3 of the 2020 PPS to protect prime agricultural lands from severances and/or new residential lot creation.
5.1 General policies for Natural and Human-Made Hazards	Reference to “risks associated with impacts of a changing climate” has been removed and there is no reference to other impacts of climate change beyond flooding.  The removal of the terms “mitigating potential risk” erodes protections to human health.	Climate change is and will increasingly impact human health and safety.  Many climate-related events will impact public health and safety. These go beyond flooding and include extreme weather events, extreme heat, extreme windstorms, drought and wildfires, and impacts on physical and mental health.	Reinsert policy wording and integrating health impacts from climate change that can be mitigated through land-use planning policies and modifications to the built environment. Policy needs to speak to all climate-related natural hazards, including flooding, extreme weather events, extreme heat, extreme windstorms, drought, wildfires.  Reinsert “mitigating potential risks” as a directed policy action.
5.3.2 Human-made Hazards	In describing human-made hazards, reference to “contaminants in air” is missing.  Sites with contaminants in land, <b>air</b> (add) or water shall be assessed and remediated as necessary prior to any activity on the site associated with the proposed use such that there will be no adverse effects.	Current guidelines require adherence to: <a href="#">Air emissions user guide for environmental activity and sector registry: Requirements for Air Contaminants   Ontario.ca</a>  <a href="#">Ontario’s Ambient Air Quality Criteria   Ontario.ca</a>	Include contaminants in air, when describing human-made hazards as follows:  “Sites with contaminants in land, <b>“air”</b> , or water shall be assessed and remediated as necessary prior to any activity on the site associated with the proposed use such that there will be no adverse effects.”
6.2 Coordination	In describing a coordinated, integrated and comprehensive approach for dealing with planning matters, “public health impacts” is missing.	Public health and equity considerations must continue to be integrated into land use planning in Ontario, fostering the health and well-being of all	Add “public health impacts” to the list

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		people. Without a healthy and strong population, the economic prosperity and social well-being of Ontario is in jeopardy.	
8.0 Definition: Affordable Housing	The definition of affordable housing has been removed from the proposed PPS.	Housing affordability is a key determinant of health. Health disparities are amplified through unaffordable housing, resulting in vulnerable populations resorting to housing that is inadequate, overcrowded or in need of major repair, and increasing risk of exposure to unsafe conditions such as extreme heat.	Retain and strengthen a definition of “affordable housing”, defined in terms of income not market value.
8.0 Definition: Complete Communities	Missing the concepts of health and climate-resiliency in the definition of complete communities.	The peer reviewed literature is clear that healthy and climate-resilient communities are complete communities. Including the concepts of health and resiliency in complete communities ties these evidence-based concepts to complete communities and ensures that the goals of health and resiliency is not lost when we seek to support the development of complete communities. This in turn supports positive health and well-being societal outcomes, thriving communities, and thriving economies.	Add the concepts of health and climate-resiliency in the definition of complete communities, as outlined below:  “Complete communities: means <b>healthy and climate-resilient</b> places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.”
8.0 Definition: Significant	Changes to the definition of “significant” regarding “wetlands, coastal wetlands and areas of natural and scientific interest” removes the oversight role of the Ontario Ministry of Natural Resources and Forestry in evaluating these natural heritage features and ensuring their protection from development and site alteration.	Natural ecosystems including wetlands are facing risks including development pressures and climate change. Integrated land-use planning and environmental protection policies are the means to preserve and enhance ecosystem functions. The United Nations Convention on Biological Diversity, highlights the need to “ensure biodiversity-inclusive urban planning, enhancing native biodiversity, ecological connectivity and integrity, and improving human health and well-being and connection to nature”.	Maintain the oversight role of the Ministry of Natural Resources and Forestry in evaluating natural heritage features including wetlands by retaining their mention in the definition of “significant”.