



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

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

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Association of Public Health  
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*Charitable Registration*  
Number 11924 8771 RR0001

October 21, 2019

Planning Consultation, Provincial Policy Statement Review  
Ministry of Municipal Affairs and Housing  
Provincial Planning Policy Branch  
777 Bay St, 13th Floor  
Toronto, ON MSG 2E5

Dear Minister Clark,

**Re: Consultation on Provincial Policy Statement Review: Proposed Policies**

Thank you for the invitation to provide feedback on the Provincial Policy Statement (PPS) Review. On behalf of the Ontario Public Health Association (OPHA), we have outlined below and in the attached appendices our recommendations for strengthening the PPS so that it better promotes population health and health equity. We have also highlighted some key public health concerns that we urge you to keep in mind in updating the PPS.

Research increasingly reveals the connection between population health and the built environment – features of the built environment can expose people to pollutants and environmental hazards, and influence lifestyles that contribute to chronic diseases. Vulnerable populations, those of lower socio-economic status, the elderly, the homeless and those with disabilities or chronic conditions, are disproportionately impacted, increasing health inequities across communities. Designing communities using a population health and health equity lens can help ensure improved health outcomes and decreased healthcare costs for Ontarians.

While we are supportive of the proposed policy changes to the PPS that aim to protect the environment and public health and safety, we have noted several policy areas that could be strengthened. Our key recommendations relate to mitigating and adapting to climate change, strengthening policies to promote the availability of affordable, safe, and accessible housing, retaining language regarding land use planning that supports all modes of transportation, and developing policy guidelines for consultations with Indigenous peoples. In addition, Appendix A outlines our specific recommendations and comments for consideration. Appendix B captures our feedback to the questions asked as part of your ministry's PPS review.

**Climate Change Mitigation and Adaptation**

We recommend that the PPS be changed as follows:

- 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; and

- incorporate actions outlined in the Government's Made-in-Ontario Environment Plan including: applying climate science in decision-making to improve resiliency, undertaking a provincial climate impact assessment, and providing climate change impact information to help developers, planners and others understand impacts.

### **Affordable and Accessible Housing**

We also recommend:

- strengthening policies to promote the availability of affordable, safe and accessible housing in order to address the growing housing crisis in Ontario;
- removing "market-based" language; and
- 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.

We trust these recommendations are helpful and urge you to consider our proposals for promoting population health and health equity within the PPS. We would be pleased to answer any questions and continue to work closely with your Ministry prior to the release of the final amendments to the PPS. Please do not hesitate to contact me at [pwalsh@opha.on.ca](mailto:pwalsh@opha.on.ca) or by calling 416 367-2181.

Thank you for your consideration.



Pegeen Walsh

### **More about the Ontario Public Health Association**

*We are a member-based charity 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 promoting public dialogue and education on healthy public policy, capacity building, research and knowledge exchange. Our membership brings together many different disciplines and sectors working together to achieve our shared vision of optimal health for all.*

## Appendix A: OPHA's Recommended Changes to the PPS

Document Section	Considerations and Context	OPHA Recommendations
<b>Part I</b>  <b>Preamble</b>	3rd paragraph: ...principles of strong communities, a clean and healthy environment and economic growth...	Include language around healthy, complete communities and climate-resilient communities.
<b>Part III</b>  <b>How to Read the PPS</b>	“The provincial policy-led planning system recognizes and addresses the complex interrelationships among environmental, economic and social factors in land use planning.”	Include health as one of the factors to consider in land use planning. Health is largely influenced by our built environment.
<b>Part IV</b>  <b>Vision</b>		No comments
<b>Part V</b>  <b>Policies 1.0</b>	1.1.1 b) accommodating an appropriate market-based range and mix of residential types	Remove the term ‘market-based range’ from the PPS due to potential variations in interpretations that could compromise the building of healthy, complete communities. See comment for policy 1.1.3.8.
	1.1.1 b) recreation, park and open space, and other uses to meet long-term needs	Include the term greenspace (e.g. park, open space and greenspace)
		Include climate change mitigation in addition to preparation. (e.g. under 1.1.1 and 1.1.3)
	1.1.1 e) Support the inclusion of transit-supportive development	Retain support for the inclusion of transit-supportive development, as this promotes healthy complete communities where there is an appropriate mix of services, amenities, employment, recreation and transit.  Extend support for sustainable and low or zero emission forms of transportation to improve air quality and mitigate climate change.

1.1.1 g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;	<p>Include a revision to the definition of ‘Public Service Facilities’ to include parks (section 6.0 definitions), which is a critical element of a healthy, livable community.</p> <p>Add the following as a new policy (j) to section 1.1.1: promoting mixed-use development that enhances and supports the development of communities that are walkable with convenient access from residences to facilities, transit, services, retail (including access to healthy and affordable food), schools, recreation and employment opportunities in their design.</p> <p>Add a new policy k) promoting sustainable modes of transportation by provision of electric vehicle and alternative fuel infrastructure.</p>
1.1.3.2 (c) minimize negative impacts to air quality, climate change, and promote energy efficiency	Consider adding water quality to 1.1.3.2 (c) minimize negative impacts to air <i>and water</i> quality, climate change, and promote energy efficiency
1.1.3.2.(d) prepare for the impacts of a changing climate;	Revise wording as follows: “Incorporate climate science including provincial and local climate vulnerability assessments in preparing for the impacts of a changing climate”
1.1.3.8 Sufficient opportunities to accommodate growth and to satisfy market demand are not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the identified planning horizon;	<p>Remove the term market demand.</p> <p><i>Rationale:</i> Perceptions of how market demand is defined and assessed may differ depending on the stakeholder. The development industry may have a different definition from a municipality. This could lead to different assessments that may contradict the development of healthy, livable communities and the potential for more than required levels lower density housing and unsustainable expansion of urban boundaries.</p>
1.1.4.1 h) conserving biodiversity and considering the ecological benefits provided by nature;	Include considerations of the health and climate resiliency benefits of nature in addition to ecological benefits.
1.2.6.1 Land Use Compatibility:	Revise this wording by adding “air pollutants” as they are major contaminants of concern for Ontarians.

<p>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 odour, noise and other contaminants, 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>[Approximately 7,020 premature deaths per year in Ontario have been attributed to air pollution. (<i>Health Canada, 2017. Health Impacts of Air Pollution in Canada. An estimate of premature mortalities.</i>)]</p> <p>Rationale: The current proposed amendments to the PPS removes wording regarding separation of facilities and sensitive land uses, with a focus on mitigating or minimizing. This may result in increased environmental exposure to air pollution, noise pollution and light pollution, which are risk factors for chronic disease in Ontario (especially for cancers, heart and lung disease, as well as stress-associated mental health).</p> <p>Strengthen the policy to improve public health protective measures by requiring appropriate separations where necessitated. For example, as noted in Public Health Ontario’s research “require buffer zones between major traffic arteries and homes, daycares, schools and long-term care facilities when planning land use.”</p> <p><a href="https://www.publichealthontario.ca/-/media/documents/ohp-trap.pdf?la=en">https://www.publichealthontario.ca/-/media/documents/ohp-trap.pdf?la=en</a></p> <p><a href="https://www.publichealthontario.ca/-/media/documents/environmental-burden-cancer-on.pdf?la=en">https://www.publichealthontario.ca/-/media/documents/environmental-burden-cancer-on.pdf?la=en</a></p>
<p>1.2.6.2 b) potential impacts of these uses are minimized and mitigated in accordance with provincial guidelines, standards and procedures.</p>	<p>Add the following to (b) section 1.2.6.2 b) potential impacts of these uses are minimized and mitigated in accordance other provincial guidelines, standards and procedures. <i>A Health Impact Assessment approach can be considered where feasible.</i></p> <p><u>Rationale:</u> 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>1.3 Employment Areas, subsection 1.3.1: (e) ensuring the necessary infrastructure is provided to support</p>	<p>Add the following to section 1.3 Employment, subsection 1.3.1: (e): ensuring the necessary infrastructure is provided to support current and</p>

current and projected needs	projected needs <i>and to ensure convenient, efficient and reliable public transit infrastructure and pedestrian/cycling infrastructure to facilitate active transportation to employment areas.</i>
1.4 Housing	Strengthen housing policies to require considerations of climate change impacts through adaptive building and site design.
1.4. 3	Remove the term ‘market-based range’ from the PPS due to potential variations in interpretations that could compromise the building of healthy, complete communities.
1.4.3 a) establishing and implementing minimum targets for the provision of housing which is affordable to low and moderate income households and which aligns with applicable housing and homelessness plans.	<p>Replace the language on “minimum targets” for a clear statement on “adequate targets.” Minimum targets have been the focus of affordable housing policy for years, but with little results in effectively addressing the needs of the population. Currently, consideration of higher targets is framed as an exception, providing little encouragement to municipalities to consider more ambitious goals.</p> <p>The full housing continuum also requires consideration of individuals at risk of homelessness, in addition to low and moderate income households.</p> <p>Change 1.4.3 a) to the following: “... the provision of housing which is safe and affordable to low and moderate income households, <i>meets the needs of people suffering from housing insecurity...</i>”</p>
1.4.3 e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations;	<p>Include language around active transportation and supportive development and include requirements for air rights so that spaces for social infrastructure and affordable housing can be provided.</p> <p><i>Rationale:</i> Transit-supportive development, including the potential for air rights in proximity to transit will help contribute to healthier communities.</p> <p>Include provisions for low carbon refueling infrastructure to support clean modes of transportation, in alignment with the Made-in-Ontario Environment</p>

	Plan.
1.5.1 a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity	<p>Incorporate a <i>complete streets</i> approach to address the needs and safety of all road users, and include the climate protection in the planning of the streets (e.g. natural and built shade to reduce heat and sun exposure)</p> <p>Planning of public streets, spaces and facilities must not only be safe but must also accessible to older adults and people with disabilities.</p>
1.6.6.3 and 1.6.6.4 Planning for sewage and water services: Individual	Negate/Reject the permits for individual onsite sewage services and individual onsite water services in areas susceptible and/or vulnerable to ground water and surface water contamination as these areas may include significant recharge areas, vulnerable aquifers, exposed bedrock and limited overburden.
1.6.7.2 Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.	<p>Transportation Demand Management (TDM) methods - such as carpooling or ride sharing for example, as rural areas typically do not have a transit system. We recommend wording that encourages rural areas to pursue innovative TDM strategies to meet the transportation needs of rural residents, particularly aging rural residents.</p> <p>We recommend including wording around active transportation infrastructure and in this section.</p> <p>Concern that language has been softened from “shall” to “should” with regards to efficient usage of existing and planned (transportation infrastructure). We recommend retaining “shall.”</p> <p>Finally, we recommend explicit direction for planning authorities to prioritize adequate transportation systems, including active and low carbon modes of transportation, especially in rural communities.</p>
1.6.8.1 Planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit and electricity generation facilities and transmission systems to meet current and projected needs	Protect the corridors and rights of way for transportation infrastructure to explicitly include active transportation.
1.7.1 b) encouraging residential uses	Remove “market-based”

	to respond to dynamic market-based needs...	
	1.7.1 g) providing for an efficient, cost-effective, reliable multimodal transportation system that is integrated with adjacent systems and those of other jurisdictions	We highly support this change of working collaboratively with neighbouring municipalities to connect transportation networks. We urge the Province to retain this wording in future versions.
	1.7.1 i) sustaining and enhancing the viability of the agricultural system through protecting agricultural resources and minimizing land use conflicts, providing opportunities to support local food, and maintaining and improving the agri-food network.	<p>Add language to ensure that sufficient land is designated for agricultural purposes.</p> <p>The agricultural sector contributes to the economic sustainability of a region and improves consumer access to local food. We are satisfied that language has been introduced that “providing opportunities to support local food and maintaining and improving the agri-food network” to promote economic development. We recommend additional language to ensure that sufficient land is designated for agricultural purposes.</p>
	1.7.1 (k) minimizing negative impacts from a changing climate and considering the ecological benefits provided by nature	Include health benefits: ...the ecological <i>and health</i> benefits provided by nature
	1.8.1 c) focus major employment, commercial and other travel-intensive land uses on sights which are well served by transit where this exists or is to be developed, or designing these to facilitate the establishment of transit in the future.	Add active transportation: ... served by transit <i>and active transportation</i> infrastructure where this exists or is to be developed...
	1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for impacts of a changing climate through land use and development patterns which: ..	Insert a new policy...which: (h) incorporates climate science and climate change impact information including provincial and climate impact assessments.
	1.8. Energy Conservation, Air Quality and Climate Change	Insert new policy 1.8.2: Planning authorities shall incorporate provincial and local climate change vulnerability assessments into official plans and other land use planning policies
<b>Part V</b>	2.1.1 natural features and areas shall be protected for the long term	Edit the Section 2.1.1 natural features and areas shall be protected for the long term <i>as they provide many benefits to human health including improved air quality,</i>



<b>Policies 2.0</b>		<i>increased climate resiliency, reduced greenhouse gas emissions, and preserved water quality, provide opportunities for physical activity and recreation, and improves mental health and supports health and social equity.</i>
	2.6.5 "Planning authorities shall engage with Indigenous communities and consider their interests when identifying, protecting and managing cultural heritage and archaeological resources."	Use stronger language. "Engage" and "consider" are not quantifiable and defy treaty responsibilities to which the provincial government is beholden.
<b>Part V Policies 3.0</b>	3.1 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 deaths.
	3.0 Ontario's long-term prosperity, environmental health and social well-being depend on reducing the potential for public cost or risk to Ontario's residents from natural or human-made hazards	Mitigate climate change impacts. For example, consider the establishment of designated cooling centres in the case of extreme heat, particularly for vulnerable populations who do not have air conditioning.
	3.1.3 Planning authorities shall prepare for the impacts of a changing climate that may increase the risk associated with natural hazards.	<p>Add clarity around health risks, phrased as follows: "may increase risk, including health risks, associated with natural hazards".</p> <p>Also, 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.</p>
<b>Part V Policies 4.0</b>	4.4. Support to the explicit reference to the Ontario Human Rights Code and the Charter of Rights and Freedoms	We highly support the explicit reference to the Ontario Human Rights Code and the Charter of Rights and Freedoms; this is a positive step to prevent discriminatory land use planning involving discriminatory neighbourhood opposition, which can effectively prevent the provision of affordable housing to vulnerable populations. We urge the Province to retain this policy statement.
	4.7 Planning authorities shall take action to support increased housing supply and facilitate a timely and	Include a clause to fast-track applications for developments that are affordable for those living with lower incomes as well as projects that support climate

	<p>streamlined process for local development by:</p> <p>a) identifying and fast-tracking priority applications which support housing and job-related growth and development;</p>	<p>adaptive and mitigative sustainable design to promote healthy, inclusive communities.</p> <p>In addition, add a clause to fast track developments willing to include facilities and programming that promote community building and social inclusion.</p>
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## Appendix B: 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. (Reference:

[http://www.nccch.ca/sites/default/files/Community\\_Planning\\_Equity\\_Lens\\_Aug\\_2011.pdf](http://www.nccch.ca/sites/default/files/Community_Planning_Equity_Lens_Aug_2011.pdf))

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  
[http://www.health.gov.on.ca/en/common/ministry/publications/reports/climate\\_change\\_toolkit/climate\\_change\\_toolkit.aspx](http://www.health.gov.on.ca/en/common/ministry/publications/reports/climate_change_toolkit/climate_change_toolkit.aspx)
- Greenspace and EcoHealth Toolkit: Improving Health and Well-being through Greenspace Provision, Design and Access  
[https://static1.squarespace.com/static/5c3cebfd45776eee4408f72d/t/5ce36add07c4de0001f02676/1558407905219/EcoHealth\\_Toolkit\\_03\\_30\\_17.pdf](https://static1.squarespace.com/static/5c3cebfd45776eee4408f72d/t/5ce36add07c4de0001f02676/1558407905219/EcoHealth_Toolkit_03_30_17.pdf)
- Healthy Built Environment Linkages Toolkit [http://www.bccdc.ca/pop-public-health/Documents/HBE\\_linkages\\_toolkit\\_2018.pdf](http://www.bccdc.ca/pop-public-health/Documents/HBE_linkages_toolkit_2018.pdf)