

July 27, 2023

Ontario Ministry of Municipal Affairs and Housing

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.

Please accept this submission in response to the proposed Provincial Planning Statement (PPS) on behalf of the Ontario Dietitians in Public Health (ODPH) Food Systems Workgroup. ODPH is the independent and official voice of Registered Dietitians working in the Ontario public health system. ODPH provides leadership in public health nutrition by promoting and supporting member collaboration to improve the health of Ontario residents through the implementation of the Ontario Public Health Standards.

Dietetic practice includes “assessing, promoting, protecting, and enhancing health, and the prevention of nutrition-related diseases in populations.”¹ A strong food supply in Ontario is critical in preventing nutrition-related diseases and ultimately supports population health. The proposed PPS plays a direct role in the development of a sustainable food system, climate change adaptation and mitigation, and the future health of Ontarians.

In order to prioritize population health and health equity in a new province-wide planning policy instrument that combines the current PPS and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (APTG), it is essential to retain and/or incorporate the following core components²:

- Creating communities that are compact, comprehensive, environmentally friendly, and food secure;
- Enhancing climate resilience through adaptation and mitigation strategies;
- Engaging meaningfully with Indigenous communities;
- Ensuring public health and safety;
- Promoting affordable and accessible housing;
- Protecting the environment, including providing access to green spaces;
- Establishing multimodal transportation systems that prioritize active transportation and public transit;
- Developing community infrastructure that considers both essential services, such as water and wastewater management and transportation, and social infrastructure, such as public spaces, community planning aspects that foster social connections and community engagement and includes all individuals.

Sustainable Food Systems

A sustainable food system delivers community food security and nutrition to ensure that economic, social, and environmental bases for future generations are not compromised. It is

critical to supporting nutritious diets and creating healthy communities. The way food is produced, distributed, processed, and sold within a region impacts food choices and nutrition related health outcomes. Communities that have access to a sustainable supply of healthy, and locally grown and processed food are thought to be less susceptible to external factors that can influence the nutritional quality and/or quantity of available foods.³

Ensuring community food security, a key outcome of sustainable food systems, requires that a variety of elements be addressed.⁴ Some of these elements are outlined below with respect to how the proposed PPS will negatively impact a sustainable food system in Ontario.

- *Availability means that a diverse food supply and adequate food infrastructure is in place.* As per section 4.3.3 of the proposed PPS, residential lots will be created on prime agricultural land. This impacts Ontario's food system and the ability of the province to meet this demand. Ontario's agricultural lands are a finite and shrinking resource, making up less than five percent of all provincial land, and is currently being lost at a rate of 319 acres per day.⁵ These losses are not sustainable, and it's vital that Ontario has a strong, viable and sustainable supply of food products grown, harvested, and processed locally.⁶ Policies must be in place to encourage farmers to grow food. Instead, the proposed policy will make it difficult for farmers as they will be competing with developers. However, anecdotal reports state that the PPS will remove the creation of residential lots on prime agricultural land; ODPH supports this change. Evidence demonstrates there is sufficient land designated for urban growth in southern Ontario to meet current housing needs and for the next 30 years.⁷
- *Accessibility ensures that everyone has physical access to adequate and acceptable food.* Evidence indicates that compact, complete communities facilitate economic growth, sufficient land use, opportunities for recreation, and access to food. The proposed policy will encourage sprawled development that will fragment and isolate farm communities, reducing access to food.
- *Affordability means everyone has adequate income to purchase foods that meet cultural and personal preferences.* The proposed policy will remove measures that require developers to build diverse housing types that Ontarians can afford. Inflation, supply-chain disruption, and climate-related events in recent years have highlighted the urgent need for both affordable housing and the protection of farmlands. Reducing the availability of affordable housing will add to the growing problem of food insecurity: the inability to afford food due to inadequate or insecure income. The proportion of Ontarians living in food insecure households in 2021 was 19.2% or 2.8 million people. This represents the highest rates recorded since monitoring of this problem began in Canada in 2005.⁸
- *Acceptability ensures that the food system meets cultural preferences and needs.* To ensure a sustainable food system, the unique role and inherent rights of Indigenous peoples must be recognized, which includes access to traditional lands.

Climate Change

Healthy communities enhance and promote health and well-being while being resilient to climate change. Ontario must manage its resources in a sustainable manner to conserve biodiversity and protect public health, which includes preparing for a changing climate. Public health has a significant role in climate change adaptation and mitigation as they work with various partners, including municipalities, “to reduce exposure to health hazards and promote the development of healthy built and natural environments that support health and mitigate existing and emerging risks, including the impacts of a changing climate.”⁹

The frequency of extreme weather events has increased in recent years¹⁰ and these events negatively impact our agricultural sector by decreasing crop yield, availability, and quality.¹¹ The proposed PPS, although recognizes the importance of climate change mitigation, generalizes the policy approach through “balancing housing with resources” and “developing approaches” to reduce greenhouse gas emissions. The current PPS and APTG has stronger policy language and direction around climate change adaptation, mitigation, vulnerabilities, and increased resiliency in order to support healthy communities.

Dietitians in public health recognize the strong connection between food and climate change. As noted in ODPH’s response to Bill 23, “food is grown, harvested, and processed in our communities and the lands and waters that surround them — our continued [community] food security relies on us doing so in a sustainable manner. In the face of a rapidly changing climate and uncertain seasonal weather patterns, the disruption of complex wetland systems can have massive impacts on above- and below-ground waterways, and the production potential of adjacent agricultural lands. Further, disruptions to long food supply-chains, increased transportation expenses, crop failure in other parts of the world, and the need to limit our use of carbon-based fuels, require us to increase [community] food security by deepening our access to sustainably produced, [and] locally grown food.”¹²

From a food systems perspective, to ensure community food security, climate change must be recognized across many aspects of land-use planning.³ ODPH recommends that climate change mitigation and adaptation policies be integrated into policies for infrastructure and facilities, transportation, water, stormwater management, and agriculture. As well, policies for natural and human-made hazards must include public health and safety for all climate-related hazards (i.e. extreme heat, extreme windstorms, drought, wildfires).

Health and Well-being of Ontarians

As mentioned above, almost 1 in 5 Ontario households are experiencing food insecurity. In our response to consultation on Bill 23, we highlighted the ecological and human health implications of urban sprawl and development. “Individuals and families are also increasingly needing to choose between the rising cost of housing and the rising costs of food. Inflation and supply-chain disruption in recent years shines a light on the urgent need for both affordable

housing and to protect all foodlands and farmlands as key components of our current and future food security.”¹² Appropriate land-use planning and protection of lands can promote health in all dimensions: physical, mental, emotional, and spiritual.

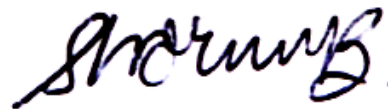
Previous iterations of the PPS and Growth Plans explicitly recognized the health and well-being of Ontarians (see attached appendix for examples), and how healthy communities and natural environments are interconnected with human health. ODPH echoes concerns raised by others, including the Ontario Public Health Association, that the merging of the PPS and APTG disintegrates the original intentions of these documents, and many essential, health-promoting components to support climate resiliency and a sustainable food system in Ontario. In consideration of a new provincial planning policy instrument, we urge the Province to consider the inclusion of the following policies as proposed by the Ontario Public Health Association¹³:

1. Prevent unsustainable urban expansion and fragmentation of agricultural lands.
2. Integrate affordability targets for low- and moderate-income households to support equity and promote housing affordability for all.
3. Strengthen policies that will help communities mitigate greenhouse gas emissions and adapt to climate change.
4. Mitigate exposure to incompatible land uses and harmful levels of pollution.
5. Re-integrate 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.

Sincerely,



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Appendix: Past Examples of Health Promoting Language in PPS and Growth Plans

Examples of healthy food systems language from the [2017 Growth Plan for the Greater Golden Horseshoe](#):

2.2.1. Managing Growth (p 14)

4. Applying the policies of this Plan will support the achievement of complete communities that:

d) expand convenient access to:

iv. healthy local affordable food options including through urban agriculture

6.2.6. Agricultural System (p46)

7. Municipalities are encouraged to implement regional agri-food strategies and other approaches to sustain and enhance the Agricultural System and the long-term economic prosperity and viability of the agri-food sector, including the maintenance and improvement of the agri-food network by:

a) providing opportunities to support access to healthy, local, and affordable food, urban and near-urban agriculture, food system planning and promoting the sustainability of agricultural, agri-food, and agri-product businesses while protecting agricultural resources and minimizing land use conflicts

4.2.10 Climate Change (p52)

1. Upper- and single-tier municipalities will develop policies in their official plans to identify actions that will reduce greenhouse gas emissions and address climate change adaptation goals, aligned with the Ontario Climate Change Strategy, 2015 and the Climate Change Action Plan, 2016 that will include:

g) promoting local food, food security, and soil health, and protecting the agricultural land base

4.2.5. Public Open Space (p46)

2. Municipalities are encouraged to establish an open space system within settlement areas, which may include opportunities for urban agriculture, rooftop gardens, communal courtyards, and public parks.