**CAPE- Ontario Submission to the Environmental Registry of Ontario Re: Proposed amendments to The Greenbelt Plan and Boundary Regulation and The Oak Ridges Moraine Conservation Plan (ERO No. 019-6216; ERO No. 019-6217; ERO No, 019-6218)**

**Prepared by the**

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**Summary**

Proposed amendments to the Greenbelt Plan, Greenbelt Area boundary regulation and proposed land redesignation under the Oak Ridges Moraine Conservation Plan are not in the interest of Ontario or Ontarians. They contain the potential to unleash incalculable health harms starting immediately and to be entrenched for generations to come. The proposals if implemented will harm not only human health, but the health of our environment, our economy and our democracy. The proposed changes would worsen fundamental social determinants of health including housing and food security, while escalating deadly air pollution and the climate crisis which represents the single greatest human health crisis today. Implementation without due consultation including Indigenous nations undermines the authority of Conservation Authorities, Municipalities and their Green Standards, public/expert input and Indigenous rights while threatening the world’s largest protected Greenbelt. Massive economic and insurance burdens or loss of public services supported by Municipalities may fall on taxpayers. Lack of meaningful public participation decision-making with significant climate impact may contravene Article 12 of the Paris Agreement [1]

CAPE Ontario urges the Government of Ontario to fulfill its mandate to serve the well-being of Ontarians by ensuring these proposed amendments and land redesignation do not proceed to implementation. We recommend sustainable and equitable development avoiding any infringement on the Greenbelt, avoiding sprawl, respecting Municipal Green Standards, and coordinated by experienced urban planners. Detailed plans have already been completed by such urban planners working with other appropriate experts in many municipalities. These should be implemented as ready sustainable solutions to achieve the healthy thriving future we can still achieve if good governance is exercised. There has never been more at stake as the ways in which we use our land, move, eat and live over just the next few years will determine our chances of a healthy livable future for all.

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The Canadian Association of Physicians for the Environment, Ontario Regional Committee (CAPE-ON) presents this submission with regards to proposed amendments to the Greenbelt Plan, Greenbelt Area boundary regulation and proposed land redesignation under the Oak Ridges Moraine Conservation Plan (ERO No. 019-6216; ERO No. 019-6217; ERO No, 019-6218). CAPE is a non-partisan, non-profit physician-based organization advocating on the understanding that environmental health directly impacts human health and must be a priority in all policy decisions**.**

Judicious land use planning is increasingly essential to public health, the economy, housing supply and affordability, equity, food security and the escalating climate crisis.  With COP27 to address our dire planetary situation recently completed, the UN Intergovernmental Panel on Climate Change stated this year “The scientific evidence is unequivocal: climate change is a threat to human wellbeing and the health of the planet. Any further delay in concerted global action will miss a brief and rapidly closing window to secure a liveable future.” [2, p.1]. The Government of Ontario must center this concept in any policies going forward. The proposed amendments which will destroy sections of the Greenbelt do not respect the UN statement above. It has not been made clear why the Government of Ontario is ignoring the findings of its own provincial task force that ample land to meet expanding housing needs is already identified within existing urban boundaries.

Sustainable urban planning accommodates population growth models by optimizing densification while avoiding sprawl and enforcing evidence-based greenhouse gas emissions targets to mitigate adverse environmental impacts. This produces many significant health and economic co-benefits. In Ontario, the Conservation Authorities, protected Greenbelt land, Municipal Green Standards and public/expert consultations and oversights all play a critical role in achieving sustainability. These are now all threatened by the proposed amendments and land redesignation which poses serious risks to the health of Ontarians associated with massive environmental, and economic harms. The proposals if implemented despite the overwhelming public outcry against encroachments on the Greenbelt also pose concerns in eroding the health of Ontario’s democratic process.

A multitude of far-reaching negative impacts will arise from these proposals including the following health impacts:

1. **The proposals examined by this submission will create a smaller supply (only 50,000 of the 1.5 million units promised during the 2022 provincial election campaign) of larger sized, less affordable and more isolated housing units by promoting suburban sprawl, as compared to sustainably planned densification within existing urban boundaries.**
* This will worsen the current crises of both housing supply and affordability, deepening social inequity.
* Access to housing is an essential social determinant of health: “The impact of housing on health is now being widely considered by policy makers. Housing is one of the best-researched social determinants of health, and selected housing interventions for low-income people have been found to improve health outcomes and decrease health care costs…many health care systems, payers, and government entities are seeking to better understand ... health and housing literature to determine where they might intervene effectively.” [3, p.1]. Has this government considered the public health and cost impacts in this context?
* Fossil fuel use will be amplified with proposed sprawl housing compared with planned sustainable densification both by increased transportation needs as noted below and heating/cooling the larger and isolated homes. Transportation and the built infrastructure represent two of the highest sources of fossil fuel emissions in Ontario. Both are escalated with sprawl development. Resultant health impacts are explored below.
* Many powerful combined health, environmental and economic solutions will be made impossible by sprawl development including low emissions public transit, healthy active transport (walking, cycling) and district energy systems.
1. **Proposed amendments will promote private vehicle dependent communities and lifestyles**.
* Increased road infrastructure required to access sprawl housing and services/amenities is known to increase vehicular traffic and car use [4].
* Private car dependent lifestyles decrease physical activity and mental health.
* Increases in obesity, diabetes, heart and lung disease as well as motor vehicle accidents will result [5].
* Greenhouse gas (GHG) emissions and air pollution will be escalated with further damage to human health.

1. **Proposed amendments will destroy critically important wetlands, greenspaces and farmland.**
* These lands function as natural carbon sinks. Their destruction will worsen the climate crisis. Natural undeveloped land is neither an untapped monetary asset waiting to be exploited for profit, nor an unnecessary indulgence in areas of growing population pressure. These lands are increasingly critical to human health and survival and must be recognized as such.
* While evidence-based targets for preserving undeveloped green and blue spaces are accepted as 30% by 2030, southern Ontario currently only has 15% coverage which will be further compromised by infringing on the Greenbelt.
* Building over more land will increase heat islands. These amplify the health impacts of global warming and disproportionately affect lower socioeconomic populations worsening inequities [6]
* Building over more land will increase overland flooding risks. Ontario’s protected Greenbelt lands and Conservation Authorities were largely set up in recognition of the risk of flooding to help protect Ontarians from these risks. Dismantling these protections by dismantling the Conservation Authorities through multiple deliberate pathways built into The More Homes Built Faster Act and selling off parcels of the previously protected Greenbelt without Conservation Authority involvement will harm Ontarians. Health risks, massive costs, problems with insurability and potential legal liabilities may result. The federal government of Canada recently advised federal support cannot be extended to Ontarians harmed by future flooding by these amendments if imposed by the provincial government. The Ontario government was already named in a $1 billion class action lawsuit for rampant poorly planned development upstream directly resulting in flooded properties downstream in Oakville, Ontario [7].
* Decreased access to greenspaces and nature has multiple proven negative health repercussions including increased rates of stroke, heart disease, asthma, high blood pressure, poor mental health such as stress and anxiety [8].
* Further proven benefits of increased exposure to nature and/or greenspaces include improved memory, creativity, work satisfaction, longevity in seniors, and healthier birth weight babies. Children demonstrate healthier body weights and physical fitness, improved function in ADHD (attention hyperactivity and deficit disorder), better school test scores and school graduation rates [9].
* Building over already dwindling farmland will decrease local food production. Climate change worsened by development further reduces the productivity of any remaining land. This compounds food insecurity and affordability. We are currently already seeing record high food bank use in Ontario in October 2022 [10]. Access to affordable nutritious food is another essential social determinant of health threatened by the proposed amendments and the complementary More Homes Built Faster Act [11], in addition to the loss of provincial revenue and well being of Ontario’s farmers.
1. **Proposed amendments will escalate deadly air pollution.**
* Air pollution will be increased by sprawl development destroying parcels of the Greenbelt, with the increased motor vehicle use associated with sprawl communities and increased natural gas burned to service larger isolated homes.
* As the 4th largest cause of death and illness globally, air pollution prematurely kills 6600 Ontarians every year with an economic impact of over $49 billion dollars [12, Sec. 2.3].
* Air pollution particles especially PM2.5’s enter the human body and bloodstream via the lungs and cause disease of multiple body systems including: lungs (asthma, COPD, bronchitis); cardiovascular (high blood pressure, heart attacks, irregular heartbeats); neurologic (dementia, Alzheimer’s, Parkinsons, ADHD, others); cancers (lung, breast, leukemia); and endocrine (diabetes, obesity).
* Air pollution exposure is also linked to low birth weight babies, birth defects and still births ,and increases risks of COVID-19 infection, transmission and deaths.
* The worst health impacts of air pollution are disproportionately and inequitably borne by lower socioeconomic, marginalized and racialized communities [13].
1. **Proposed amendments and land redesignation will escalate uncontrolled GHG emissions fuelling the climate crisis.**
* The climate crisis represents the single greatest human health crisis of our time [14]. A number of far-reaching health impacts exist.
* Extreme heat is a significant risk factor for death and illness. Canada’s single deadliest weather-related event was the 2021 BC heat dome which killed 815 Canadians, mostly elderly and/or of lower socioeconomic strata [15].
* Direct illness and death also result from flooding, extreme wind events, drought and wildfires. Wildfires in turn escalate air pollution, able to travel thousands of kilometres and causing further health harms. Ontario’s worst wildfire season on record occurred in 2021 [16].
* Many infectious diseases are increasing and/or emerging due to the climate crisis. Many experts have already predicted and warned that pandemics such as COVID-19 and other zoonotic infections (spreading from animals to humans) will be increasingly common due to effects of the climate and environmental crisis globally.
* Lower crop yields directly resulting from climate change affecting health and nutrition through food insecurity have already been discussed.
* The climate crisis has many major increasing negative mental health impacts including anxiety, depression, addictions, suicidality and solastalgia.
1. **Proposed amendments and land redesignation in conjunction with the More Homes Built Faster Act will impose massive costs and insurability concerns for municipalities and taxpayers while removing their democratic participation in the process.**
* The complementary proposed Greenbelt amendments/Oak Ridges Moraine land redesignation with the Act are unsustainable not only from an environmental and health perspective but also economically.
* Ontario’s Financial Accountability Office (FAO) calculated the extra costs generated simply to maintain public transportation infrastructure due to climate change at $1.5 billion annually, non-inclusive of cost of wildfires and ice storms [17].
* It is clearly understood that the costs of failing to take climate action are far higher than the cost of taking urgent action. Sprawl development costs the public more than double the cost of planned densification [18]. Ontario’s economy already loses over $49 billion every year to air pollution. This will increase further with the proposed Greenbelt and Oak Ridges Moraine amendments [12, Sec. 2.3].
* By escalating non-renewable energy use, air pollution, climate change, infrastructure costs for sprawl development, healthcare costs, decimating efficiencies in coordinated higher level urban planning, reducing municipal revenues from development charges, and numerous other damaging mechanisms, the More Homes Built Faster Act, for which the amendments and land redesignations currently under consideration have been proposed, will result in massive costs that will fall on municipalities. The municipalities in turn will either have to slash public services or collect the revenue shortfall from taxpayers who will face unaffordable tax hikes
* Homeowners will face a crisis of insurability with insurance either being unaffordable or unavailable. Insurance industry reports have already stated: “insurance providers may start to withdraw property coverage in areas deemed too costly, or worse, avoid insuring certain risks altogether, if circumstances do not change. This could put tremendous financial pressure on the government.” [19, p.1]
* Conservation Authorities, Municipalities, citizen input and expert oversight are silenced by design by the More Homes Built Faster Act which must be included in this discussion as the stimulus for the proposed Greenbelt amendments. The valuable informed work of experienced urban planners and professional city staff who have worked to produce sustainable development solutions that would help Ontario thrive are being ignored and rejected. Painstaking land use and boundary expansion decisions such as in Hamilton and Halton, achieved with countless hours of effort, citizen engagement and due democratic process over the past year are unilaterally being overturned. Appeal processes are being eliminated. This may contravene Article 12 of the Paris Agreement [1].
* The timing of release of Bill 23 the day after the 2022 Ontario Municipal Election and inexplicably tight timeline imposed for public consultation while newly elected Municipal Councils were still in transition severely restricted adequate scrutiny, oversight and response by citizens, experts and municipalities.
* The public record documents in 2018 the current premier promised he would not develop the Greenbelt, the world’s largest such protected greenspace [20]. Ontarians expect the government to keep its promises and govern with integrity. Our collective future depends on it.

References:

[1] S. Magniez-Pouget, T. Straathof, and G. Bonomini,. “*Is ACE a legal obligation? A review of States’ obligations under international, regional and national legal frameworks*” Climate Outreach, United Kingdom, Oxford, 2022.

[2] International Panel on Climate Change. Feb 2022. “Climate change: a threat to human wellbeing and health of the planet,”.<https://www.ipcc.ch/report/ar6/wg2/resources/press/press-release/>

[3] L. Taylor, Jun 2018. “Housing and Health: An Overview of The Literature,” Health Affairs,<https://www.healthaffairs.org/do/10.1377/hpb20180313.396577/>

[4] M. Curry, Nov 2015. “Caltrans Admits Building Roads Induces More Driving, But Admitting a Problem Is Just the First Step,” Streetsblog California.<https://cal.streetsblog.org/2015/11/18/caltrans-admits-building-roads-induces-congestion-but-admitting-a-problem-is-just-the-first-step/>

[5] Public Health Agency of Canada, June 2018. “The Chief Public Health Officer’s Report on the State of Public Health in Canada 2017 – Designing Healthy Living - Canada.ca,” Public Health Canada.<https://www.canada.ca/en/public-health/services/publications/chief-public-health-officer-reports-state-public-health-canada/2017-designing-healthy-living.html>

[6] Wellesley Institute, August 2013. “Urban Heat Island Effect Fuels Health Conversation”, Wellesley Institute.<https://www.wellesleyinstitute.com/health/urban-heat-island-effect-fuels-heatlh-equity-conversation/>

[7] T. Dunn, Oct. 2020 “$1B class-action claim alleges Oakville property owners at flood risk due to ‘over-development,’” Canadian Broadcasting Corporation.<https://www.cbc.ca/news/canada/toronto/1b-class-action-claim-alleges-oakville-property-owners-at-flood-risk-due-to-over-development-1.5755264>

[8] C. Twohig-Bennett and A. Jones, “The health benefits of the great outdoors: A systematic review and meta-analysis of greenspace exposure and health outcomes,” *Environmental Research*, vol. 166, pp. 628–637, Oct. 2018, doi: 10.1016/j.envres.2018.06.030.

[9] “PaRx: A Prescription for Nature - Why Nature?” Parks Prescriptions.<https://www.parkprescriptions.ca/en/whynature>

[10] L. Johansen, Oct 2022. “Food Insecurity Leading to Record Numbers at Canadian, Local Food Banks this Thanksgiving” Toronto City News.<https://toronto.citynews.ca/2022/10/08/canada-food-banks-thanksgiving-food-insecurity-daily-bread-food-bank-toronto/>.

[11] “Access to Foods That Support Healthy Dietary Patterns - Healthy People 2030 | health.gov,” Office of Disease Prevention and Health Promotion.

<https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/access-foods-support-healthy-dietary-patterns>

[12] “Health Impacts of Air Pollution in Canada 2021 Report,” Health Canada.<https://www.canada.ca/en/health-canada/services/publications/healthy-living/2021-health-effects-indoor-air-pollution.html#a3.3>.

[13] S. Roussy, J. Kuhl, J. Burnside, J. McArthur, A. Helferty. “Mobilizing Evidence: Activating Change on Traffic Related Air Pollution (TRAP) Health Impacts”, Canadian Association of Physicians for the Environment, Toronto, Ontario, Canada, 2022

[14] “Climate Change and Health,” World Health Organization. Oct 2021.<https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>

‌[15] “Number of sudden deaths during B.C.'s heat dome revised up to 815 — and more hot weather is on the way,” Canadian Broadcasting Corporation, Jul 2021.<https://www.cbc.ca/news/canada/british-columbia/bc-heat-dome-sudden-deaths-revised-1.6118351>

[16] M. Vis, Nov 2021. “Ontario forest fires burned record area of land this summer as they displaced First Nations in northwest,” Canadian Broadcasting Corporation.<https://www.cbc.ca/news/canada/thunder-bay/record-breaking-ontario-forest-fire-season-1.6242422>

[17] The Canadian Press “Climate change could cost Ontario extra $1.5B per year just to maintain transportation infrastructure: FAO,” Canadian Broadcasting Corporation, Sep 2022.<https://www.cbc.ca/news/canada/toronto/ontario-climate-change-fao-1.6591561>

[18] A. Schmitt Mar 2015. “Sprawl Costs the Public More Than Twice as Much as Compact Development,” Streetsblog USA,<https://usa.streetsblog.org/2015/03/05/sprawl-costs-the-public-more-than-twice-as-much-as-compact-development/>

[19] M. Rosanes, Dec 2021. “How climate change is impacting home insurance rates in Canada,” Insurance Business Magazine.<https://www.insurancebusinessmag.com/ca/news/home/how-climate-change-is-impacting-home-insurance-rates-in-canada-320723.aspx>

‌[20] S. Jeffords, May 2018. “Doug Ford reverses his plan, says he will not develop on Greenbelt,” CTV News,<https://toronto.ctvnews.ca/ontario-election-2018/doug-ford-reverses-his-plan-says-he-will-not-develop-on-greenbelt-1.3910587>