Explanation of comment format: The comments that follow are organized according to sections of the Official Plan, referencing the Official Plan Amendment Consultation Draft (March 8, 2022) and include the Official Plan headings, sub-headings and numbers. Comments are not provided for all sections of the plan, rather sections and elements of notable public health interest. Recommended additions for consideration are presented in **bolded text** under relevant headings and sub-headings.

Section 2.0 Policy Framework

Preserving and protecting the natural environment has many environmental benefits such as preserving biodiversity, better outdoor air quality, and reducing exposure to potential hazards.[1] As well, "being in and viewing nature has significant physical and mental [health] benefits including increased social well-being and reduced stress." (BC Centre for Disease Control, 2018, p.32)

Natural environments can also help to reduce greenhouse gas (GHG) emissions and help to reduce the negative effects of climate change. Preserving and protecting natural environments is important as health risks from climate change are growing for residents in Middlesex-London and actions are needed to address potential impacts.[2,3]

MLHU supports the strengthened focus in the proposed amendments to the Official Plan that stresses an "ecological systems-based approach" and protection of natural features and ecological functions of the environment. There is a strong connection between the ecosystem and human health and wellbeing (Eco-health, Ecological Determinants of Health). The aim to balance economic development with the protection of natural environments has many co-benefits to the environment, communities and individuals and contributes to climate change mitigation and adaptation. This approach also focuses on sustainability and takes a broader long-term focus on the environment versus what may be of concern in the immediate proximity, or on adjacent lands.

2.2 Resource Management

2.2.2.1 Agriculture: Introduction

MLHU supports protecting agricultural land as it contributes to a stable food system and supports local food production and supply. Purchasing local food helps to reduce the carbon footprint while stabilizing food security. Agricultural practices that seek to reduce greenhouse gas (GHGs) (methane) and fertilizer run-off, should be considered within the context of climate change and health of the environment.

2.2.3.3 Aggregate Resources: New Pits and Quarries

- f) the impact of **environmental hazards** on any existing or potential, **private and/or** municipal water supply resource areas;

2.3 Growth Management

2.3.1 Growth Management: Introduction

MLHU supports directing future growth to Settlement Areas as this facilitates the creation of complete, compact and connected communities, while preserving the natural environment, agricultural land and reducing potential exposure to natural hazards; all of which can increase sense of place or community, physical and mental well-being and contribute to climate change mitigation (i.e., the preserving of green space, and encouraging and facilitating active transportation).[1,2]

2.3.3 Forecasting Growth
Given the projected forecasts in population included in the "Population and Housing Projections Report", noting the average age of the population is getting older, it will be important for municipalities to encourage and support infrastructure, development and design that supports all ages and abilities, and aging in place, in areas such as the transportation system, housing policies and Settlement Areas.

2.3.4 Economic Development
Health is influenced by many factors including individual genetics, lifestyles, and the places where we live, learn, play, work, and age and it is these factors that contribute to the health of individuals and communities. However, there are important social determinants of health which can be barriers to reaching optimal health such as: access to health services; culture, race, and ethnicity; disability; income and income distribution; employment, job security, and working conditions; education; food insecurity; housing; physical environments; and social support networks.[4,5] Many of these barriers also increase vulnerability to climate change for individuals and communities.[2]

Policies and initiatives that aim to address these barriers without causing further inequities are important and can contribute to improving the overall health of individuals and communities.

Recommended enhancements to policies include the following:
- d) encourage local municipalities to promote a high standard of urban design by prioritizing principles such as pedestrianization, **compact form,** mixed-use, **high quality** functional public spaces **that include natural and built features**, accessibility and universal design, to create healthy vibrant communities which attract investment.
- f) support the retention **and creation** of **accessible** educational, health, recreational, cultural and religious facilities to ensure that the County's communities are provided with those opportunities that facilitate growth and well-being. Such facilities provide a vital role in small communities and add economic vitality and a sense of place and community where quality of life is considered a major attraction for growth and development.
- m) encourage, where possible**, equitable and integrated** multi-modal access to employment lands including walking and cycling trails **and public transit**.
- r) promote the development of agri-tourism and work with local municipalities, **municipal food policy councils,** and agricultural representatives to explore options for the development of local agri-tourism, including identifying strengths, unique local attributes, opportunities, and potential links with value-added agriculture, local foods, potential new product markets, local heritage, recreation opportunities, and natural heritage and identifying the facilities, infrastructure, and resources necessary to support an agri-tourism industry. The development of agri-tourism must not interfere with agricultural operations.
- t) require that local municipalities support strong urban design and revitalization **that considers affordable housing, access to healthy food, green space, and transportation** where needed in downtown cores as a means of enhancing the quality of place.

MLHU supports the encouragement of a vibrant, dynamic arts and culture community that contributes to the growth, prosperity and vibrancy of the County as it is important for the social well-being of the community and can lead to a sense of place and community belonging. In addition, MLHU supports the creation of a strong and sustainable local agricultural sector that can increase access to local foods produced through sustainable agricultural practices.

2.3.5 General Policies

MLHU supports the policy statement "Local official plan will promote the creation of resilient communities. As such, development applications should be reviewed with respect to anticipated impacts that may result from a changing climate."

2.3.6 Settlement Capacity Study

Recommended enhancements to policies include the following:

- d) an identification of any existing restrictions to future development, **including any potential hazards.**
- g) an assessment of traffic and transportation services and needs, **including existing infrastructures and their condition.**
- **An assessment of the local food system, including access to healthy, affordable food.**

2.3.7 Housing Policies

As already indicated above under 2.3.4 Economic Development, housing is an important social determinant of health that can affect the ability to reach optimal health.[4,5] The quality of housing can positively or negatively impact the physical, mental and social well-being of individuals; therefore, it is important to ensure that everyone has access to safe, good quality housing.[1] Offering a variety of mixed housing types and forms is also important as it is inclusive and provides quality housing for a range of different incomes, life stages and supports aging in place. Mixed housing types can also reduce social isolation and increase sense of safety, social connectedness, mental health and health equity.[6]

MLHU supports policies that aim to address access to safe, diverse, accessible housing and commends the County's commitment to undertake an "Attainable Housing Review.

Recommended enhancements to policies include the following:

- vii) Policies that encourage **and prioritize** a pedestrian and mixed-use focus, **connectivity and access to green space** in new development

From a climate change perspective, MLHU supports the policy statement: "Policies that promote the reduction of greenhouse gas emissions, improvements in air quality, promotion of compact form, use of green infrastructure and development that maximizes energy efficiency and conservation including the use of alternative and renewable energy sources."

2.3.7.3 Housing Policies: Intensification and redevelopment

Recommended enhancements to policies include the following:

- County Council shall encourage residential intensification and redevelopment in areas designated for residential use which comply with the following criteria;
  - **Current land and/or surrounding land uses do not pose an adverse impact on human health**

2.3.8.1 Settlement Areas: Urban Areas

Recommended enhancements to policies include the following:

- New development should proceed in an integrated, **complete** and compact form.

2.4 Physical Service & Utilities

2.4.2 Transportation System

Recommended enhancements to policies include the following:

- The County encourages the development and maintenance of a sustainable, interconnected and energy efficient transportation system that supports a variety of **safe** transportation modes **for all users.**

2.4.2.2 Transportation System: General policies

Recommended enhancements to policies include the following:

- d) Encourage **the development and maintenance of** an integrated transportation system that supports a variety of safe, sustainable and energy efficient modes of transportation;
- f) Encourage safe, convenient and visually appealing pedestrian and cycling infrastructure **for all ages and abilities;**
- h) Ensure that development proposals that are likely to generate a traffic impact are accompanied by an Engineering Report addressing the potential impact on the transportation system **and its' users** and surrounding land uses to the satisfaction of the County and the local municipality;

2.4.4 Waste Management

MLHU supports the inclusion of this section and the upstream approach towards waste management as identified in the Official Plan. Less waste to landfill through diversion and reduction efforts will result in fewer hazards and contribute to climate change mitigation efforts through reduction in greenhouse gases.

3.0 Detailed Land Use Policies

3.2.3 Detailed Land Use Policies: Local Official Plans

Recommended enhancements to policies include the following:

- j) Transportation **for all users (transit users, pedestrians, cyclist and motorists);**
- **Access to healthy, affordable food, including food retail access and green spaces providing opportunities for local food production;**
- **Green infrastructure.**

3.2.4.1 Urban Areas: Permitted Uses and 3.2.5.1 Community Areas: Permitted Uses
Overall, the MLHU supports the permitted uses in both Urban and Community areas but
recommended enhancements to policies include the following:

- **Urban agriculture (e.g., community gardens, farmers markets, roof top gardens, and edible
landscaping**)

Summary:
The County of Middlesex Official Plan amendment is an opportunity to revisit and review the County's
framework and policies of the current Official Plan. Land use policy can have a positive impact on the
health and well-being of Middlesex County residents by influencing the environments in which people
live, work, play and age. Both the physical and built environments are important factors in determining
the health of a community.

The MLHU respectfully submits the comments and recommendations outlined in this document for
consideration of inclusion in the County of Middlesex Official Plan.

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2. Berry, P., Paterson, J. and Buse, C. (2014). *Assessment of Vulnerability to the Health Impacts of
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