



## **Submission to the Standing Committee on Heritage, Infrastructure and Cultural Policy of the Legislative Assembly of Ontario**

Submission on Bill 23, More Homes Built Faster Act, 2022

November 2022

## **Safe, Affordable Housing, Access to Green Space, and Sustainable Communities are Essential for Children's Health**

The **Canadian Partnership for Children's Health and Environment** (CPCHE) and additional signatories urge the Government of Ontario and the Committee on Heritage, Infrastructure and Cultural Policy to consider the impacts of Bill 23 on the environments in which children live, learn, and play. By reducing affordable rental housing, decreasing preservation of and access to greenspace, and changing policies related to land use planning, the built environment, and climate-resiliency, Bill 23 threatens to jeopardize the health and development of children in Ontario, now and into the future, with potential disproportionate impacts on children affected by poverty and socio-economic marginalization. If implemented, provisions in Bill 23 will increase children's exposures to key environmental risks – such as air pollution, the effects of climate change, housing precarity, and lack of access to green space – that are scientifically linked with harmful effects on children, including increased risk of asthma and other chronic diseases over the life course, as well adverse effects on children's brain development, ability to learn, and emotional and mental well-being.

We outline the important impacts that affordable housing, access to green space, and sustainable and climate-resilient land use planning have on child health, and offer recommendations for action.

All children deserve to grow up in environments that support their health and well-being, including safe, affordable, and healthy housing, access to green space, and sustainable and climate-resilient communities. Bill 23 includes some initiatives that may contribute to the creation of diverse and new affordable housing by allowing new housing options, increasing density, and reducing development costs for non-profit housing providers. Concerningly, however, Bill 23 erodes the capacity of municipalities to preserve and increase affordable rental housing and green spaces, address energy efficiency and climate change in new buildings, and ensure the development of sustainable, walkable, climate-resilient communities. This will have significant impacts on child health outcomes across Ontario.

## Who we are

[CPCHE](#) is a national collaboration of organizations working together since 2001 to advance children's environmental health in Canada. CPCHE's 19 partner and affiliate organizations have expertise in clinical and public health, environmental protection, law and policy, child care, education, disability advocacy, and health equity. CPCHE organizations work across disciplines to synthesize scientific evidence, mobilize knowledge, foster intersectoral solutions, and support informed decision-making.

CPCHE leads [RentSafe](#), a collaborative, intersectoral initiative to address unhealthy housing conditions affecting tenants on low income in both urban and rural communities in Ontario, in support of the right to housing and the goal of healthy homes for all.

## Summary of Recommendations

In order to ensure that Bill 23 supports the housing needs for all Ontarians, CPCHE recommends that the Bill is revised to prioritize the housing needs of those most vulnerable to the current housing crisis in Ontario, namely renters in general, and low-income households specifically. Furthermore, CPCHE urges the government to rethink provisions in Bill 23 that will impede children's health and well-being by jeopardizing affordable housing, green space, and climate-resilient community planning.

Bill 23 should seek to:

- Preserve and increase affordable rental housing by preserving tenancies and affordable rents, supporting localized approaches to inclusionary zoning, and maintaining municipal revenues to fund affordable housing and parklands.
- Enhance, rather than reduce, children's equitable access to green space, and ensure the preservation of green space for current and future generations.
- Support land use planning that encourages child-friendly, walkable, climate-resilient communities and green development standards, and limits air pollution, including greenhouse gas emissions.

We encourage the government to create a housing bill that addresses the affordability and habitability crisis; advances the right to safe, healthy and affordable housing for all; and recognizes the right to a healthy environment.

## **The environment is a key driver of child health outcomes**

The indoor and outdoor environments in which young children learn, play, and grow contribute in crucial ways to children's lifelong health trajectories. A growing body of scientific knowledge attests to the importance of healthy settings as a determining factor in child well-being. Spending time in healthy and nurturing physical and social environments – having safe, secure homes and ample access to nature and green spaces – can contribute positively to children's development and growth. Conversely, spending time in unhealthy conditions – with ongoing exposures to poor air quality, pesticides, toxic substances, or contaminants in drinking water – can harm children's developing bodies and brains, exacerbate asthma and other health conditions, and interfere with their endocrine and immune systems.<sup>i</sup> As such, harmful exposures during these critical early years can contribute to developmental, learning, and behavioural challenges, and set children on a path towards chronic diseases later in life.<sup>ii</sup>

Compared to adults, children are more vulnerable to the health effects of environmental exposures because of differences in size, intake, development, and behaviour. Per kilogram of body weight, children eat more, drink more, and breathe more than adults, leading to greater exposures to contaminants. Their behaviours, such as hand-to-mouth activity, also lead to greater exposures. Babies and children are more susceptible to harm because their immune and metabolic systems are immature, and their brains and organ systems are undergoing dynamic development that opens up 'windows of vulnerability'. Environmental exposures and vulnerability are inequitably distributed: children experiencing poverty, racism, and the effects of colonialism are at greater risk.<sup>iii</sup> Preventing exposure to pollution and toxic substances across childhood development (including pre-conception and prenatally) is essential to promoting the health of all Ontarians.

The built environment, including our homes, our streets, and the ways our communities are designed, have significant impact on children’s exposure to environmental risks and, consequently, their health and well-being during childhood and into adulthood. Traffic-related air pollution, climate change risks, and exposures to household environmental contaminants are sources of environmental risk of particular concern related to Bill 23.

## **Affordable and healthy rental housing is critical to child health equity**

Housing, and its association with income and affordability, are significant considerations with respect to the impacts of Bill 23 on the health of children and their families. Housing conditions that affect children’s health include the health effects of substandard housing, energy poverty, and the interplay of affordability, income, and health. The preservation and development of affordable rental housing is critical to a comprehensive housing strategy in Ontario. Energy efficiency improves affordability by ensuring healthy housing with lower operating costs. Safe, affordable and adequate housing is a cornerstone for healthy children, families, and communities.

Housing is a basic need and is now recognized as a human right in Canada.<sup>iv</sup> Yet, for many people, their housing jeopardizes their health and well-being. Unfit conditions in housing, disproportionately experienced by people living on low income or in other marginalizing circumstances, negatively affect children’s physical and mental health. Multiple chronic diseases and acute effects – including asthma, respiratory conditions, allergies, chemical sensitivities, as well as cardiovascular disease and its numerous risk factors – can be exacerbated or, in some cases caused, by poverty, stress, and living in unhealthy conditions (see [RentSafe report on Housing-Related Health Risks](#)). In a review of the literature, the Canadian Paediatric Society concludes that “housing directly affects the health of children and youth, including their ability to develop optimally and achieve life goals”.<sup>v</sup>

Over 1.4 million people in Ontario, or 10.1 percent of the population, live on low income, defined as a household income of less than \$53,005 per year for a family of four.<sup>vi,vii</sup> Almost 1 in 6 (16.1%) of these people are children.<sup>viii</sup> Just over 15 percent (15.3%) of Ontarians are in core housing need, defined as

households with housing that does not meet one or more of the standards for adequacy, suitability, and/or affordability, and that have to spend 30 percent or more of their income to access acceptable local housing.<sup>ix</sup>

Renters in Ontario are disproportionately affected by the housing crisis. Over one third (33.4%) of renters are in core housing need, and 40 percent of renters with children are in core housing need.<sup>x</sup>

Ontario's purpose-built rental housing supply is aging: 85% was built before 1980; this housing is more affordable than rental housing built after 2000.<sup>xi</sup> More than half of Ontario's renters (53.6%) live in a unit below one or more housing standards.<sup>xii</sup>

Families and individuals on low income are faced with difficult choices in allocating scarce resources for food, clothing, shelter, heat and other utilities, health care and medications, transportation, and investments in training or education. Many have to settle for whatever housing is available that they can afford, resulting in reduced spending on other basic needs, such as nutritious food.<sup>xiii</sup>

Healthy and affordable housing is a critical intervention to promote children's physical well-being and mitigate the impacts of low income on child health.

## **Equitable access to green space is essential to children's development**

Play in natural and green spaces is essential to children's healthy development. Health benefits are amplified with regular and repeated time spent in natural spaces, highlighting the importance of access and proximity to nearby nature.<sup>xiv</sup> The COVID-19 pandemic highlighted the importance of parks and green spaces as public health assets.<sup>xv</sup> In addition to their importance in healthy child development, green spaces mitigate the severity of climate change-related events such as heat waves and heat domes, floods, and wildfire smoke. Green spaces offer shade, water retention and filtration, and air purification that can help to alleviate some of the intensity of these events, especially in urban areas.

To promote children's health, Bill 23 must maintain and ensure the protection of green space, including urban parkland, wetlands, riparian zones, forests and farmland.

### **Land-use planning and the built environment impact children's exposure to the risks of climate change and environmental contaminants**

Health-sustaining urban and rural community design is foundational for child health. As documented by the Ontario Public Health Association (OPHA, a CPCHE partner), this means built environments and infrastructure that support complete and mixed-use communities; promote physical activity, active transportation and public transit; reduce exposure to air pollution and extreme heat; and include green space, sun protection and social spaces. Health-sustaining community design supports health equity, environmental and economic sustainability, and quality of life.<sup>xvi</sup>

Of particular relevance to children's health, land-use planning directly impacts the production of traffic-related air pollution (TRAP) by affecting car-dependency, and the accessibility and safety of active and public transportation. Community planning also affects children's exposure to TRAP through the siting of housing, schools, and child care settings. Health Canada has identified a causal relationship between TRAP exposure and asthma in children.<sup>xvii</sup> Early-life exposure to TRAP is also associated with reduced lung function and susceptibility to respiratory infection.<sup>xviii</sup> The health effects of air pollution are a social justice issue: urban neighbourhoods with the highest social disadvantage tend to experience the greatest exposure to TRAP.<sup>xix</sup>

Land-use planning also affects communities' climate resilience. CPCHE's [Position Statement on Climate Change](#) summarizes urgent actions needed to protect children, now and into the future, from the unprecedented risks of global climate change, and underscores the important health and social justice co-benefits of decisive climate action.

To protect children's health, Bill 23 must support land use planning that encourages child-friendly, walkable, climate resilient communities, and reduces air pollution, including greenhouse gas emissions.

## Now is the time to act

We aspire to an Ontario that supports the health and well-being of all children as they grow up. We urge the Government of Ontario to revise Bill 23 to advance the foundations for child health and well-being, which lie in healthy and affordable housing for all, protected and accessible green spaces, and sustainable, climate-resilient communities in which to live, learn, play, and grow.

## Signatories



### Canadian Partnership for Children's Health and Environment (CPCHE)

#### Contact:

Erica W. Phipps, MPH, PhD  
Executive Director  
[erica@healthyenvironmentforkids.ca](mailto:erica@healthyenvironmentforkids.ca)

### CPCHE Partners:



### CPCHE Affiliates:<sup>i</sup>



### Additional RentSafe collaborators:



Grey Bruce Community Legal Clinic

[healthyenvironmentforkids.ca](https://healthyenvironmentforkids.ca)

<sup>i</sup> See all Affiliates at: <https://healthyenvironmentforkids.ca/affiliate-organizations/>

## References

---

- <sup>i</sup> For a summary of the child health implications of environmental exposures, see CPCHE's [Child Health and the Environment Primer](#).
- <sup>ii</sup> See, for example, Clark, H. et al (2020). [A future for the world's children? A WHO-UNICEF-Lancet Commission](#); and Cooper, Marshall, Vanderlinden & Ursitti (2011). [Early Exposures to Hazardous Chemicals/Pollution and Associations with Chronic Disease: A Scoping Review: Executive Summary](#).
- <sup>iii</sup> See, for example, Raphael, D., et al (2020). *Social Determinants of Health: The Canadian Facts*. <http://www.thecanadianfacts.org>; UNICEF Canada (2022). *UNICEF Report Card 17*. <http://unicef.ca/irc17>
- <sup>iv</sup> The National Right to Housing Network (n.d.). Right to Housing Legislation in Canada. <https://housingrights.ca/right-to-housing-legislation-in-canada/>
- <sup>v</sup> Canadian Paediatric Society (2019). Housing need in Canada: Healthy lives start at home. <https://cps.ca/en/documents/position/housing-need>.
- <sup>vi</sup> Statistics Canada (2022). Table 98-10-0103-01 Low-income status by age and gender: Canada, provinces and territories, census divisions and census subdivisions. <https://doi.org/10.25318/9810010301-eng>
- <sup>vii</sup> Statistics Canada (2022). Table 2.4 Low-income measures thresholds (LIM-AT and LIM-BT) for private households of Canada, 2020. [https://www12.statcan.gc.ca/census-recensement/2021/ref/dict/tab/index-eng.cfm?ID=t2\\_4](https://www12.statcan.gc.ca/census-recensement/2021/ref/dict/tab/index-eng.cfm?ID=t2_4)
- <sup>viii</sup> Statistics Canada (2022). Table 98-10-0103-01 Low-income status by age and gender: Canada, provinces and territories, census divisions and census subdivisions. <https://doi.org/10.25318/9810010301-eng>
- <sup>ix</sup> Statistics Canada (2017). Core housing need, 2016 Census. <https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/chn-biml/index-eng.cfm>
- <sup>x</sup> Canada Mortgage and Housing Corporation (2016). Core Housing Need (2016) – Ontario. <https://www03.cmhc-schl.gc.ca/hmip-pimh/en#Profile/35/2/Ontario>
- <sup>xi</sup> Government of Ontario. (2019). Housing Needs in Ontario. *Community housing renewal: Ontario's action plan under the National Housing Strategy*. <https://www.ontario.ca/document/community-housing-renewal-ontarios-action-plan-under-national-housing-strategy/housing-needs-ontario#>
- <sup>xii</sup> Canada Mortgage and Housing Corporation (2016). Core Housing Need (2016) – Ontario. <https://www03.cmhc-schl.gc.ca/hmip-pimh/en#Profile/35/2/Ontario>
- <sup>xiii</sup> Kirkpatrick, S.I. & Tarasuk, V. (2011). Housing Circumstances are Associated with Household Food Access among Low-Income Urban Families. *Journal of Urban Health*: 88(2): 284-296. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3079041/>
- <sup>xiv</sup> Outdoor Play Canada. (2015). *Position Statement on Active Outdoor Play* <https://www.outdoorplaycanada.ca/wp-content/uploads/2019/07/position-statement-on-active-outdoor-play-en.pdf>
- <sup>xv</sup> National Collaborating Centre for Environmental Health. (2022). Canadian green spaces during COVID-19: Public health benefits and planning for resilience. <https://ncceh.ca/documents/evidence-review/canadian-green-spaces-during-covid-19-public-health-benefits-and-planning>
- <sup>xvi</sup> Gardener, C., et al. (2016). Investing in Health-Promoting Infrastructure. Ontario Public Health Association. <https://opha.on.ca/wp-content/uploads/2020/09/Health-Promoting-Infrastructure-OPHA-2016.pdf?ext=pdf>

---

xvii Health Canada (2020). *Traffic-Related Air Pollution: Asthma, Allergies, and Lung Function*. <https://www.canada.ca/content/dam/hc-sc/documents/services/publications/healthy-living/traffic-related-air-pollution-asthma-allergies-lung-function-assessment/traffic-related-air-pollution-asthma-allergies-lung-function-assessment.pdf>

xviii Canadian Association of Physicians for the Environment (2022). *Mobilizing Evidence: Activating Change on Traffic-Related Air Pollution (TRAP) Health Impacts*. [cape.ca/wp-content/uploads/2022/05/CAPE-TRAP-2022-2.pdf](https://cape.ca/wp-content/uploads/2022/05/CAPE-TRAP-2022-2.pdf)

xix Cakmak S, Hebbern C, et al (2016). The modifying effect of socioeconomic status on the relationship between traffic, air pollution and respiratory health in elementary schoolchildren. *Journal of Environmental Management*, 177:1-8. <https://www.sciencedirect.com/science/article/pii/S0301479716301566>