

May 27, 2015

Richard Stromberg, Manager
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay Street, Suite 425
Toronto, ON M5G 2E5

Re: Ontario's Co-ordinated Land Use Planning Review (Registry number 012-3256)

Dear Mr. Stromberg,

We are writing to provide feedback on the co-ordinated review of the Growth Plan for the Greater Golden Horseshoe, the Niagara Escarpment Plan, the Oak Ridges Moraine Conservation Plan and the Greenbelt Plan. We were also happy to participate and provide feedback at the Stakeholder Workshop at Daniels Spectrum on March 23, 2015.

We appreciate the Province of Ontario's efforts to provide policy direction to municipalities to guide growth and protect the environment. We are particularly impressed with the direction to create complete communities that facilitate sustainable travel options including walking and cycling.

Who We Are

- The Toronto Centre for Active Transportation (TCAT) is a project of the registered charity Clean Air Partnership. TCAT's mission is to advance knowledge and evidence to build support for safe and inclusive streets for walking and cycling.
- The Toronto Cycling Think and Do Tank (TCT2) is a research organization based at the University of Toronto directed by Dr. Beth Savan, and managed by Trudy Ledsham. TCT2 specializes in identifying, understanding and reducing barriers as well as identifying, understanding and increasing facilitators of cycling.
- Dr. Paul M. Hess is an Associate Professor and the Associate Chair and Director of the Graduate Programs in Planning in the Department of Geography and Planning at the University of Toronto. His teaching and research focus is on active transportation, pedestrian environments and design, streets as public space, and urban form.
- Dr. Raktim Mitra is an Assistant Professor at the School of Urban and Regional Planning, Ryerson University, and an emerging scholar in the field of active transportation. He teaches graduate and undergraduate courses on transportation and healthy communities. Dr. Mitra's research is primarily focused on children's mobility in urban space, and on urban cycling.

TCAT works closely with all of these partners including: 1) With funding from the Places to Grow Implementation Fund, TCAT, Dr. Mitra and Dr. Hess recently completed a research project to catalogue and develop an evaluation framework for Complete Streets in Ontario's growth centres, 2) With funding from Metrolinx, TCAT and Dr. Hess worked together on a report that identified barriers to the implementation of active transportation priorities within Ontario's provincial and municipal policies, 3) Currently TCAT and TCT2 are working together on a community based social marketing program in Peel Region, and 4) TCAT and TCT2 were invited members of the Ontario Ministry of Transportation's 2013 Working Group on Ontario's Cycling Strategy.



Recommended Priority Actions1. *Keeping People and Goods Moving, and Building Cost-Effective Infrastructure*a. *How the plans can better leverage transit investments across the region*

- Integration of transit and active transportation (AT) should be high priority.
 - o A specific proportion of transit funding needs to be dedicated for active transportation infrastructure (e.g. bike lanes, sidewalks, etc.) Transit stations should act as AT hubs with cycling and walking infrastructure radiating into 5km catchment areas. The Province urgently needs to develop a task force to work with municipalities to develop this key piece of the transit AT integration puzzle. AT infrastructure will reduce need for automobile parking, reduce need for feeder buses and increase transit ridership, and reduce congestion surrounding transit stations. Retrofitting areas around transit stations for AT needs to be a provincial and municipal policy focus. (For more information see TCAT's report "The Other 25% - The Big Move and Active Transportation Investment: <http://www.tcat.ca/knowledge-centre/the-other-25-the-big-move-and-active-transportation-investment/>)
 - o A dedicated provincial fund needs to be provided for bike parking on buses and at transit stations. In 2008 Metrolinx set up a one-time \$5M fund for the Bikelinx program to equip local transit buses with bicycle racks and to install sheltered bicycle facilities at major transit stops in the Greater Toronto and Hamilton Area. While this was an important initial investment, an ongoing funding strategy is required to fully equip transit vehicles and stations, to keep up with demand, and maintain a state of good repair. Many transit stations still have minimal (including Union Station) or no bike racks and in 2014 the Ministry of Labour ordered the TTC to remove the bike racks on new articulated buses due to driver visibility problems (as of 2015 these buses will now carry one bicycle each). As new transit vehicles are rolled out, new bike racks need to be part of the design, and adequate ongoing financial support provided. If bike racks are insufficiently meeting demand for combining trips with transit, new transit policies should be implemented to increase the maximum number of bikes permitted on transit vehicles (typically it's currently a maximum of two allowed during non-rush hour periods.)

b. *How the plans can align long-term infrastructure planning with planning for growth*

- Infrastructure funding for AT should be linked with policy and programming investments, targeting areas with a high proportion of trips under 7 km to maximize return on investment. Transportation options should meet not only current, but potential demand for active transportation modes. For example, if 20% of all trips are potentially walkable and bikeable (e.g. under 2-7 km), then 20% of the trip capacity of the infrastructure should accommodate active transportation, with commensurate funding allocated to enable this capacity.
- Ontario's Cycling Strategy should be implemented with aggressive targets and funding envelopes. (See our press release on this issue: <http://www.tcat.ca/general-news/ontarios-new-cycling-strategy-bold-vision-applauded-bold-action-still-required/>)
- Funding transfers to municipalities should be tied to development of local transportation plans that prioritize AT, then transit, then multiple occupant vehicles. The Province should fund development of AT infrastructure and a portion of the operating costs of public transit systems from any carbon pricing that is implemented. Regional AT plans need to be funded so users can travel easily between jurisdictions.

c. How the plans can better support goods movement by all modes of transportation

In dense urban areas, bicycles can be key tools for small goods movements. Working with delivery firms to focus on uniformed bicycle fleets in dense areas can reduce the congestion caused by large delivery vehicles stopping for delivery and improve air quality by reducing truck exhaust in downtown heat islands. In some European cities large firms such as FedEx, UPS and DHL are all using bicycle/tricycle delivery (some with electric assist) for “last mile” delivery. Some estimates place the proportion of small goods delivered in cities at close to 50% of freight traffic. (See for example Cyclelogistics at

http://cyclelogistics.eu/docs/111/D6_9_FPR_Cyclelogistics_print_single_pages_final.pdf)

Undertaking an analysis of small freight movement in urban areas and identifying the potential for change to cycle delivery will be the first step needed to move forward in this area. This study could determine whether cost savings are such that firms don’t need incentives to move in this direction or conversely if incentives are needed for initial change. Increased commercial activity will create demand for improved cycling facilities and maintenance leading to better conditions for all cyclists. Providing cargo bikes as part of Bikeshare or other bike loan programs extends the options for pick up and delivery to individuals, enabling goods movement by bike. See <https://lastenrad-muenchen.de/#home>

2. Fostering Healthy, Liveable and Inclusive Communities

a. How the plans can provide more direction on designing a safe and interconnected network of streets that support walking and cycling, and that are connected to our transit networks and key destinations

- All provincial policy documents (e.g. Growth Plan, Provincial Policy Statement, The Big Move) and tools (e.g. Municipal Class Environmental Assessment) should be strengthened to provide clarity about provincial goals and expectations for accommodating and encouraging walking and cycling.
- The Province should incorporate Complete Streets policy language within the Growth Plan and the Provincial Policy Statement and strong, direct language to ensure that municipalities plan streets for walking and cycling. (For more information see TCAT’s detailed comments on PPS at: <http://www.tcat.ca/general-news/2172>)
- The Growth Plan for the Greater Golden Horseshoe contains broad statements about incorporating walking and cycling into land use and transportation planning which are important. The Province can spur measurable action by providing municipalities with clearer direction and specific benchmarks. For example, municipalities are guided to install bicycle lanes “where feasible”. More direction is required in how to do so or what constitutes the limiting clause “where feasible.” (For more information see Dr. Paul Hess’ and TCAT’s report: <http://www.tcat.ca/knowledge-centre/identifying-and-overcoming-barriers-to-the-implementation-of-active-transportation-policies/>)
- The Province should require the use of strong, direct language in municipal Transportation Master Plans and Official Plans to ensure that municipalities plan and prioritize streets for walking and cycling. Tools have been developed to help municipalities with this, for example the ten elements of a comprehensive Complete Streets policy (<http://completestreetsforcanada.ca/policy-elements>)

- Courtney (2009)¹ argues that the Provincial Policy Statement and the Growth Plan have been consistently ignored at the municipal level. For example, the \$25 million Bloor Street Transformation Project failed to provide any improvements to the cycling environment (Courtney 2009). While these policy documents can be used for appealing or challenging a planning decision in court (or the OMB), most road projects do not get appealed and opportunities to improve projects by including active transportation are often missed. Courtney identified that the “legislation behind these policies is inadequate” and needs to be strengthened.
 - The Municipal Class Environmental Assessment process should streamline road diets that include active transportation infrastructure and require a more rigorous approval process for removing bike lanes and sidewalks. (For more information see TCAT’s submission to the Ministry of the Environment on this topic: <http://www.tcat.ca/general-news/2153/>)
3. *Building Communities that Attract Workers and Create Jobs*
- a. *How the plans can better support the development of vibrant office and mixed-used employment areas near existing and planned transit, as well as the protection of industrial and commercial uses, particularly those near critical transportation infrastructure*

Transportation is a critical component of what makes a workplace attractive or not. Instead of increasing highway capacity assuming that driving will continue to increase, the province needs to build infrastructure that reflects a new reality where driving is not as popular as it was in previous years. Since 2001 a trend has been documented that reveals that young people (Generation Y) are driving less and are less interested in cars than previous generations. Researchers believe this trend is likely to persist given young people’s preference “to live places where they can easily walk, bike, and take public transportation”²

- b. *How the plans’ policies better support and foster vibrant rural economies while taking into account the character of rural areas and communities*

Bicycle tourism can be a key component of strengthening rural economies and is booming in Ontario.

- A 2015 report produced by Transportation Options on the state of Ontario’s Cycle tourism sector (see www.ontariobybike.ca/from-niche-to-now) determined that in 2010 alone two million Canadian visitors participated in cycle tourism in Ontario and spent \$391 million.
 - A 2015 report produced by TCAT determined that there is a high degree of interest in cycle tourism in rural communities including Niagara and Grey and Bruce Counties (See <http://www.tcat.ca/knowledge-centre/complete-streets-policy-implementation-guide-for-grey-bruce/>)
 - A recent report out of the European Union found over 80% of jobs (524,052) related to bicycling were in the tourism sector and that these jobs were more geographically stable than other sectors. (see *Cycling Works: Jobs and Job Creation in the Cycling Economy* <http://www.ecf.com/wp-content/uploads/141125-Cycling-Works-Jobs-and-Job-Creation-in-the-Cycling-Economy.pdf>)
6. *Addressing Climate Change and Building Resilient Communities*
- a. *How the plans can contribute to reductions in greenhouse gas emissions*

¹ Courtney, K.E. (2009). Sustainable Urban Transportation and Ontario’s New Planning Regime: The Provincial Policy Statement, 2005 and the Growth Plan for the Greater Golden Horseshoe. *Journal of Environmental Law and Practice*, 19(2), 71-104.

² Davis, B., Dutzik, T. & Baxandall, P. (2012), *Transportation and the New Generation. Why Young People are Driving Less and What It Means for Transportation Policy*. Frontier Group.

- Research, recognize and integrate the benefits accruing from AT, linking the silos of health promotion, climate change mitigation and adaptation and local economic development.
 - Tie AT initiatives to baseline and post implementation measures that address emissions and other economic and community benefits.
7. *Improving Implementation and Better Aligning the Plans*
- a. *Opportunities to better align key components of the plans with each other, and with other provincial initiatives, and ways to reduce overlap and duplication*
- Bicycling should have its own plan, department and focus within Metrolinx. Currently, most bicycling activity is treated as a transportation demand management (TDM) issue within Smart Commute. While TDM is an important strategy to change travel behaviour, the fundamental infrastructure and service shortfalls associated with increasing cycling for transportation are largely being ignored. No one has direct responsibility for increasing cycling mode share.
 - The Province should provide municipalities with funding to overcome local barriers to cycling including:
 - o Provision of secure and covered parking for bicycles at transit stops and tower communities where higher barriers to cycling exist³ as well as programs to increase covered parking at community centres, malls and office blocks that are targeted AT community destinations.
 - o Subsidies for community bicycle hubs focused on increasing community competence in basic utilitarian cycling skills and bicycle maintenance in urban communities with low mode share and a consequent lack of utilitarian cycle service facilities and collective competence.
 - o Subsidies for community based cycling uptake programs based on evidence-derived design.
 - o Subsidies for Bikeshare stations in underserved "transit deserts" where bicycle sales and service stores are scarce.
 - The Province should develop a consistent process and program for municipalities to collect data on pedestrians and cyclists. Currently available travel behavior surveys, for example the Transportation Tomorrow Survey for the Greater Golden Horseshoe, significantly under-report walking and cycling trips.
 - Establish clear goals for AT mode share and zero automobile caused deaths and report annually on progress towards goals.
 - Provide direction and support to municipalities to use metrics beyond mere commuter counts, including 1) pre/post studies to study and improve new infrastructure (for more information see TCAT's Complete Streets catalogue and evaluation project at: <http://www.tcat.ca/project/understand-complete-streets-in-the-greater-golden-horseshoe/>), 2) data collection on cyclist and pedestrian gender, age, collision statistics and gender and age of those injured or killed by cars, and 3) bike parking and infrastructure per head of population and bike tracks per km of roadway – aim for parity in both cases and track progress.
 - We are in full support of the Province's recent proposal to reduce the default speed limit from 50 km/hr to 40 km/hr. However this does not go far enough. In 2012, in a Pedestrian Death Review, the Chief Coroner for Ontario recommended that speed limits be reduced to 30 km/hr in

³ Ipsos Reid (2009). City of Toronto Cycling Study: Tracking Report (1999 and 2009). Retrieved from: City of Toronto (2009) survey suggests that only 33% of Toronto's cyclists live in apartment buildings, compared to 51% of non-cyclist survey participants.

residential neighbourhoods. We also recommend that 30 km/hr speed limits be instituted within 2 km of all schools, daycares, hospitals and seniors residences in order to reduce deaths by automobiles of vulnerable populations.

b. What policies of the plans that have been successful and should be retained

- In section 3.2.3 (“Moving People”) of the Growth Plan, it directs that “Municipalities will ensure that pedestrian and bicycle networks are integrated into transportation planning to: a) provide, safe, comfortable travel for pedestrians and bicyclists within existing communities and new development, [and to] b) provide linkages between intensification areas, adjacent neighbourhoods, and transit stations, including dedicated lane space for bicyclists on the major street network where feasible.” (However see recommendation above regarding clarifying “where feasible”.)

c. Any additional tools or guidance materials that the province should develop to help support implementation

- OTM Book 18: Cycling Facilities is the most updated reference document for designing cycling facilities. For example, the bicycle facility selection tool should be quite useful for municipalities to take some of the guesswork out of which type of facility should be used under what conditions (e.g. when a shared lane is acceptable or when a painted bike lane or separated bike lane is required.)
- The “Complete Streets Catalogue” (<http://www.tcat.ca/knowledge-centre/complete-streets-catalogue/>) provides municipalities with examples illustrating how Complete Streets are being applied within the Greater Golden Horseshoe, and the companion document “Complete Streets Evaluation Tool” (<http://www.tcat.ca/knowledge-centre/complete-streets-evaluation-tool/>), provides assistance to municipalities in evaluating Complete Streets project.

8. Other Comments

Transportation choices and options are cultural and are related to not just ease and cost of movement, but tradition, status and social norms. Our current transportation culture is heavily oriented towards the use of privately owned motor vehicles and the costs they impose are treated as “normal”.

Actions to help change this norm include:

- Increasing the legitimacy of bicycles through uniformed service fleets by expanding police and paramedic bicycle fleets: incenting bi(tri)cycle fleets for Community Care Access Centre (CCAC) service delivery by personal support workers and nurses; and tax incentives for delivery services to use bi(tri)cycle fleets in urbanized areas.
- Establishing walking and cycling education as a mandatory part of the Ontario Grade 6 curriculum in order to build collective competence in cycling for transportation.
- Modeling cultural change by ‘walking the talk’ within the Provincial Government, the civil service and Ontario’s Crown Corporations. Carbon based activities including cars and air transport should not be used as status symbols or rewards. Provincial automobile fleets should be analyzed for both necessity and emissions impacts and changes instituted. Increased levels of responsibility should not be aligned with increased emissions impact i.e. a more senior position cannot reasonably result in a bigger engine and more emissions in a low carbon culture. The Province should implement employee engagement and reward programs to accelerate adoption of AT for

civil service commuters and provide bike fleets for work related travel.

In Conclusion

In short, this plan represents an important step towards sustainability, and, in particular, can promote low carbon, low pollution, healthy and livable communities through clear strong measures that incentivize and require active transportation infrastructure, access and programs. We support your efforts in this direction and urge you to incorporate the specific measures mentioned above, to ensure a clear direction and constructive outcomes.

Thank you for the opportunity to comment on this important topic.

Sincerely,



Nancy Smith Lea, Director
Toronto Centre for Active Transportation,
Clean Air Partnership

Dr. Paul M. Hess, Associate Professor, Associate Chair, Director
Graduate Programs in Planning, Department of Geography and Planning,
University of Toronto

Trudy Ledsham, Project Manager
Toronto Cycling Think and Do Tank,
University of Toronto

Dr. Raktim Mitra, Assistant Professor
School of Urban and Regional Planning,
Ryerson University

Dr. Beth Savan, Principal Investigator
Toronto Cycling Think and Do Tank,
University of Toronto