

October 19, 2016

Bill Mauro,
Minister of Municipal Affairs
Land Use Planning Review
Ontario Growth Secretariat
Ministry of Municipal Affairs
777 Bay Street, Suite 425
Toronto, ON M5G 2E5

Re: Ontario's Proposed Growth Plan for the Greater Golden Horseshoe, 2016 (EBR Registry Number 012-7194)

Dear Minister Mauro,

We are writing to provide feedback on the revisions to the Growth Plan for the Greater Golden Horseshoe, 2016. We recognize that the proposed changes to the Growth Plan were part of a co-ordinated land use planning review along with the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan. We would like to commend the Province of Ontario for its leadership in integrating its four provincial land use plans so that they work together to manage growth, build complete communities, curb sprawl and protect the natural environment in Ontario's Greater Golden Horseshoe region.

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. TCAT was an invited member of the Ontario Ministry of Transportation's 2013 Working Group on Ontario's Cycling Strategy.
- Dr. Raktim Mitra is an Assistant Professor at the School of Urban and Regional Planning at Ryerson University and co-director of Transform: The Transportation and Land Use Planning Research Lab at Ryerson University. His teaching and research focuses on the neighbourhood environment (travel behavior, health interaction), particularly in the GGH region.
- Dr. Paul M. Hess is an Associate Professor 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.

TCAT works closely with these partners including:

- With funding from the Places to Grow Implementation Fund, TCAT, Dr. Mitra and Dr. Hess produced a series of publications to understand Complete Streets in the Greater Golden Horseshoe Region.
 - *Complete Streets Catalogue: Understanding Complete Streets in the Greater Golden Horseshoe Region* (2014). Using examples from 19 municipalities, the catalogue features the diversity of Complete Streets approaches across the region.



A Project of Clean Air Partnership

75 Elizabeth Street, Toronto, Ontario M5G 1P4 • 416-392-0290 • www.tcat.ca

- *Complete Streets Evaluation: Understanding Complete Streets in the Greater Golden Horseshoe Region* (2015). This audit tool provides 21 performance indicators to assess the effectiveness of Complete Streets projects.
- *Complete Street Transformations in the Greater Golden Horseshoe Region* (2016). This book features nine projects from municipalities throughout the region looking at evidence from before and after changes were made to each street to determine how effective they were in meeting four key goals: 1) increasing sustainable and active transportation, 2) improving safety, 3) improving level of service for users of all modes, and 4) improving the surrounding environment.
- *Identifying and Overcoming Barriers to the Implementation of Active Transportation Policies* (2014). With funding from Metrolinx, TCAT and Dr. Hess worked together on a research report that identified barriers to the implementation of active transportation priorities within Ontario's provincial and municipal policies.
- *Cycling Patterns and Potential in the Greater Toronto and Hamilton Area* (2016). With funding from Metrolinx, TCAT and Dr. Mitra worked together on a research report that quantifies potential for cycling growth, and identifies areas with high and low cycling potential across the Greater Toronto and Hamilton Area (GTHA).

Priority Recommendations and Feedback

On May 27, 2015 we made a joint response, along with the Toronto Cycling Think & Do Tank at the University of Toronto, providing 29 recommendations for consideration in Ontario's 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. Our 2015 submission is available [here](#). We are pleased to see some of our recommendations reflected in the policy changes relating to active transportation and Complete Streets in the Proposed Growth Plan for the Greater Golden Horseshoe, 2016. However there are also some suggestions that have not been addressed and as a result we see opportunities for improvement. Below are the priority recommendations and feedback that we would like to highlight.

1. *Complete Streets policy language incorporated in the Growth Plan*

The proposed Plan incorporates a strong directive for municipalities to adopt a Complete Streets approach in "the design, refurbishment or reconstruction of the existing and planned street network" (3.2.2.3). This represents a major step forward, and makes Ontario the first province in Canada to adopt a Complete Streets policy. It replaces a much more weakly worded section of the 2006 plan and is an important improvement.

2. *Improved clarity for municipalities about provincial goals and expectations for prioritizing walking and cycling*

The updated plan includes stronger support for the "safe, comfortable and convenient use of active transportation" (2.2.1.3d(i)) and municipalities are directed to "prioritize active transportation, transit and goods movement over single-occupant automobiles" (3.2.2.4c). Municipalities are also directed to ensure that active transportation networks provide "safe, comfortable travel for pedestrians, bicyclists and other users of active transportation", including "dedicated lane space for bicyclists on the major street network" or, if not feasible, to provide "other safe and convenient alternatives" (3.2.3.4). This could be strengthened by specifying what would be considered "not feasible", e.g. on corridors where specific users are prohibited (e.g. 400 Series Highways or pedestrian priority areas). Also, importantly, municipalities are directed when locating new public service facilities (e.g. hospitals and schools), that preference "should be given to sites that are easily accessible by active transportation and transit" (3.2.8.6). This strengthened language is welcome and will help to provide much-needed direction to municipalities.

3. *Better integration of transit, walking and cycling still required*

The proposed Growth Plan includes other notable policy improvements, for example, with regard to *Major Transit Station Areas*. The new policies state that access to these sites should be multimodal (2.2.1.2g) and link to nearby trip generators, and their design should include sidewalks, bicycle lanes and secure bicycle parking, where appropriate (2.2.4.4). These policies could be strengthened by clarifying the phrase “where appropriate” and by adopting proposed target areas with a high proportion of trips under 5km, a distance that can be easily made by bicycle in under 20 minutes. Our recent research studying the potential for increasing cycling in the GTHA (Mitra et al, 2016) found that there are 4.35 million daily trips in the region with high potential for being converted to cycling. More than half (53%) of these are between 1 and 3 km in length.

As well, the proposed Growth Plan fails to direct that bike parking should be sheltered or to address the issue of bicycles on transit vehicles, two items which were included as recommended priority actions in our 2015 submission. In addition, while the proposed Growth Plan emphasizes the need to strengthen and integrate regional transit, a similar emphasis on regional active transportation plans does not exist. Finally, the proposed Plan refers to the planning and design of Major Transit Station Areas, but does not specifically address the refurbishment or retrofitting of existing stations. Our research (Mitra et al, 2016) found that cycling can play a critical role in solving the first/last mile problem.

4. *Consistent evaluation process still lacking for transportation projects*

The proposed Growth Plan could be strengthened by addressing project evaluation, targets and data collection, and by setting clear provincial goals. Our research with local transportation experts in the GGH that resulted in a Complete Street Evaluation tool (Smith Lea et al 2015) revealed that while there was an awareness of the importance of evaluating roadway projects, these professionals identified the absence of mandate, direction, or budget to do so as a significant barrier. Our subsequent research into Complete Street transformation projects in the Greater Golden Horseshoe (Smith Lea et al 2016) found that transportation projects in the region are “being undertaken without consistent, systematic, or sometimes any, evaluation of benefits” and without a clear articulation of what goals or targets are to be achieved. At present, the proposed Plan states only that transportation demand management plans “may include setting modal share targets” (3.2.2.4b).

5. *Active transportation added as key component to attracting workers and creating jobs*

In the proposed Growth Plan, active transportation has been added in relation to employment areas or public service facilities, that these locations should “support active transportation” (2.2.5.6) and improve connectivity with, and be facilitated by the development of “active transportation networks” (2.2.5.10; 2.2.5.11). These are welcome and relevant changes, responding to recent demographic and transportation trends. The policies could be strengthened by specifying what “active transportation networks” entail, e.g. providing secure and sheltered bicycle parking, dedicated cycling facilities (such as bicycle lanes and cycle tracks), and improved pedestrian facilities (complete sidewalk networks, extensions at intersections to reduce crossing distances, leading pedestrian intervals, raised crossings, pedestrian refuge islands, etc.) On a related topic, the proposed Plan does not address the need for secure, sheltered bicycle parking in apartment neighbourhoods.

6. *Addressing broader benefits (climate change mitigation and public health)*

The proposed Plan recognizes the link between public health, climate change and active transportation (2.2.1.3d). This articulation of the link between building complete communities and

“overall quality of life, including human health, for people of all ages and abilities” is important. However, the potential economic benefit associated with bicycles has not been addressed, nor the possibility of using bicycles for small goods movement.

7. *Funding mechanisms need to be articulated*

Several of our recommended priority actions identified in 2015 relate to funding, which the proposed Growth Plan does not address. It is important to reiterate that significant progress towards growing active transportation will not happen without committed and ongoing provincial government support.

In Conclusion

Overall, we welcome and support the policy changes relating to active transportation and Complete Streets in the Proposed Growth Plan for the Greater Golden Horseshoe, 2016. However there are several priority actions that we identified in 2015 that have not been addressed and as a result we see opportunities for improvement.

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



Dr. Paul M. Hess, Associate Professor,
Department of Geography and Planning,
University of Toronto