

February 27, 2019

Steve Clark, Minister of Municipal Affairs and Housing
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor, Toronto, ON M5G 2E5
By email: growthplanning@ontario.ca

Re: Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe

Dear Minister Clark,

I am writing on behalf of The Centre for Active Transportation (TCAT) to provide feedback on the proposed amendment to the Growth Plan for the Greater Golden Horseshoe, 2017. According to the Ministry, the purpose of this policy change is to create a more flexible and streamlined development process, open up land for housing, increase the supply of housing and jobs near transit and allow municipalities greater local autonomy and flexibility¹. However, in our view these changes could lead to increased urban sprawl and car-dependency across the region, which is in direct contrast to the original purpose of the 2017 Growth Plan.

Who We Are

The 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 is a leading voice in Canada's Complete Streets movement, and has been a key actor in shaping policies, practices, and programs to support vulnerable road users since 2006. TCAT was an invited member of the Ontario Ministry of Transportation's 2013 Cycling Strategy Working Group and the 2017-2018 Minister's Advisory Panel on Cycling. Between 2014 and 2017, with funding from the Places to Grow Implementation Fund, TCAT produced a series of publications to understand active transportation and Complete Streets in the Greater Golden Horseshoe ([Active Transportation Planning Beyond the Greenbelt](#), 2017; [Complete Street Transformations](#), 2016; [Complete Streets Catalogue](#) and [Evaluation Tool](#), 2015).

Priority Recommendations and Feedback

On October 19, 2016, TCAT made a joint response, along with Dr. Paul Hess (University of Toronto) and Dr. Raktim Mitra (Ryerson University), providing seven recommendations on revisions to the Growth Plan for the Greater Golden Horseshoe, 2016. Our 2016 submission is available [here](#). We are pleased to see a continued commitment to Complete Streets in the 2019 proposed amendment to the Growth Plan. However, we have concerns that the proposed amendment could lead to increased urban sprawl across the region. Below are the priority recommendations and feedback that we would like to highlight.

1. *Increasing car-dependency*

The proposed amendment to the Growth Plan is likely to lead to increased urban sprawl and car-dependency through two major changes:

First, the proposed revisions create weaker targets for new development in greenfield areas. The previous density target for greenfields was 80 people or jobs per hectare, and the new targets now range from 40-60 per hectare. A greenfield development with 80 people or jobs per hectare typically includes a mix of housing types, and enough density to support mixed uses and a compact, complete community. In contrast, the lower density targets will encourage the development of typical suburban land use patterns and contribute to car-dependent urban sprawl.

Second, the proposed revisions will make it easier for municipalities to create lower densities in transit areas. The proposed revisions will expand the density radius around transit station areas from 500 to 800 metres. In theory, this could lead to an increased opportunity for municipalities to add more multi-unit housing within walking distance to transit stations. However, the revisions also allow municipalities to request lower density targets in transit station areas. This would make it easier for municipalities to build car-oriented transit stations, encouraging more car trips and providing a disincentive for accessing transit by bike or on foot.

2. *Weakened environmental language*

The proposed amendment to the Growth Plan weakens the environmental language included in the plan. The amendment proposes to remove concrete commitments to create “net-zero” or “low carbon” communities (1.2.1). In their place is language about creating “environmentally sustainable” communities (1.2.1). Also removed is the call for a development approach that supports a “clean and healthy environment” and “social equity” (1.2). In its place is an “approach that puts people first” (1.2). These changes are subtle but they weaken language that supports environmental and social justice.

In Conclusion

The proposed amendment retains an emphasis on complete communities and Complete Streets, as introduced in the 2017 update to the Growth Plan. In our [response](#) to the 2017 Growth Plan, we applauded the Province of Ontario for becoming the first province in Canada to support Complete Streets through provincial level policy. We are glad to see the Province remain strong on this commitment through the continued inclusion of language supporting the development of complete communities, Complete Streets and active transportation. However, we have concerns that the weaker density targets for greenfields and transit station areas could lead to increased urban sprawl and car-dependency in the region.

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

Sincerely,



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

Reference

1. Ministry of Municipal Affairs and Housing. Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017. Environmental Registry of Ontario. 2019. Available from: <https://ero.ontario.ca/notice/013-4504>