



February 27, 2019

To: Laurie LeBlanc, Deputy Minister, Ministry of Municipal Affairs and Housing

From: Leslie Woo, Chief Planning Officer, Planning and Development

RE: Metrolinx Comments on Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe

We appreciate the invitation to provide feedback on proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe (GGH). Along with provincial ministries, municipalities, transit agencies, and many other transportation stakeholders, we have made progress in transforming mobility in this region, and look forward to continuing to do so.

Metrolinx's comments are intended to support the Province's vision and policies for managing growth in the GGH. They are focused on leveraging the benefits of coordinated transit and land use planning as emphasized in the 2041 Regional Transportation Plan (2041 RTP) approved by the Metrolinx Board of Directors in March 2018. Since 2008's "Big Move" regional transportation plan, Metrolinx has consistently noted the importance of an integrated approach to transportation and land use planning and policy. The comments provided below build on past submissions to the Ontario Growth Secretariat, such as those that informed the 2017 Growth Plan, and provide some suggested modifications to Amendment 1 that will enable Metrolinx to continue advancing its mandate under the *Metrolinx Act, 2006* to develop an integrated transit network in the region that is in alignment with the Growth Plan.

Transit-Oriented Development at Major Transit Station Areas (Growth Plan, 2017: 2.2.4):

The 2041 RTP devotes a chapter to the importance and cost-effectiveness of integrated transit and land use planning in order to achieve the full potential of provincial investments in GO Expansion and rapid transit (RTP Strategy 4). It also emphasizes the need for provincial policy to prioritize ridership growth through mixed use, transit-oriented development (TOD), particularly at Major Transit Station Areas (MTSAs) on Priority Transit Corridors (RTP Priority Action 4.3).

TOD provides an opportunity for the Province to leverage third-party investment to reduce the funding required for transit expansion, to leverage existing real estate assets to increase ridership and revenue, and to enhance the GO customer experience. It is critical that MTSAs produce as much inbound, outbound and transfer ridership as possible.

Metrolinx strongly recommends that intensification of Major Transit Station Areas (MTSAs) be facilitated and prioritized, particularly those located on Priority Transit Corridors and subway lines:

- These areas are one of the focal points for Metrolinx’s TOD Market-Driven Strategy, endorsed by the Metrolinx Board of Directors in December 2018 and supported by the Minister of Transportation.
- They require focused attention to fully achieve the benefits of existing and planned transit infrastructure in the region (see 2041 RTP Maps 2, 3, 4 and 5).
- MTSAs are particularly important to Metrolinx in the context of the GO Expansion program, given the level of transit service that is planned for them and the development potential around them, and success depends largely on the ability to attract more people to GO stations by non-auto modes (RTP Strategy 1).

To optimize the potential of station areas, Metrolinx recommends that:

- Minimum densities for MTSAs be maintained or potentially increased relative to the type of transit service that exists or is planned for them. This should be determined based on projected ridership impacts in the long term and take into account potential impacts on Metrolinx’s TOD Market-Driven Strategy. This is particularly important if MTSAs will now be delineated up to an 800 metre radius.
- Density be calculated based on the developable land in the MTSA to recognize the true opportunities of implementing in these locations.
- The Ontario Growth Secretariat refer to Metrolinx’s GO Rail Station Access Plan, which outlines anticipated ridership growth and changes to patterns of station usage, including an increase in off-peak users and reverse commuters that is anticipated with GO Expansion, and the need to reduce reliance on the car and GO parking.

Employment Areas and Provincially Significant Employment Zones (Growth Plan, 2017: 2.2.4):

Employment is a significant generator of transit trips in the region, and employment-related policies in the Growth Plan should ensure that new office developments are located where they can be supported by transit, as these are areas that can be difficult to access and service. Metrolinx’s market-based forecast, created to inform the development for the 2041 RTP, found that the growth in employment in downtown Toronto is advancing more quickly than anticipated, and will be more concentrated in Toronto’s downtown core. Directing jobs to Priority Transit Corridors and MTSAs is also essential to meet the potential of the Growth Plan.

However, mixed-use can often best support two-way travel patterns, and is instrumental in creating resilient communities that provide a strong quality of life. In addition, the new designation, “Provincially Significant Employment Zone” (PSEZ), could have an unintended impact on Metrolinx’s work . The PSEZ designation may impact the value of Metrolinx-owned land and Metrolinx’s ability to implement TOD in an efficient and effective manner, consistent

with market demands. Generally, the market may not respond with transit-supportive development, or may be slower to respond to opportunities in a PSEZ.

Metrolinx recommends that the Ministry work closely with Municipalities, developers and Metrolinx to ensure the appropriate mix of uses can happen at MTSAs. This will help to ensure that MTSAs can be developed to include the diversity of land uses that generate multi-directional ridership throughout the day. More specifically, a PSEZ designation will likely have a direct impact on the viability of a redevelopment site or area, reducing the overall value and a developer's ability to deliver a new station as part of the TOD Market-Driven Strategy. GO stations that are located in a proposed PSEZ include Woodbine, Milliken, Ajax, Oshawa, Rutherford, York, Downsview, Etobicoke North, Malton, Bramalea, Trafalgar (portion), Lisgar, Meadowvale, Clarkson (south portion), Bronte, Appleby, and Aldershot.

Additional Comments

Metrolinx is supportive of the change to the guiding principles of the Growth Plan (1.2.1) that adds that intensification and density will be prioritized in "strategic growth areas" to make efficient use of land, infrastructure and support transit viability, as it recognizes the diversity of built form in the GGH, and in turn also supports Metrolinx's TOD Market-Driven Strategy.

Proposed new language in several areas is valuable, including emphasizing the importance of linking transportation investments with economic growth, and on the impacts on capital and operating costs of unmanaged growth (3.1). The emphasis on planning for new or expanded infrastructure occurring in an integrated manner, including evaluations of long range scenario-based land use planning, environment planning and financial planning that will be supported by relevant studies, is also valuable from Metrolinx's perspective (3.2.1).

Metrolinx notes that changes to settlement area boundary policies and intensification targets (Where and How to Grow policies) may make local transit less viable and thus more difficult to attract riders to the GO network, particularly at the edges of the GGH. A greater density of settlements in the GGH is more supportive of local transit service than lower-density, residential communities.

Metrolinx recommends that the impact of proposed changes be discussed between Metrolinx and ministries, municipalities and transit service providers:

- Impact on population and employment projections with potential for lower ridership forecasts in less dense areas, and therefore lower Benefit-Cost Ratios;
- Higher costs of local transit operations, and
- Continued reliance on private vehicles for station access.

Finally, Metrolinx would also like to work with the Ministry of Municipal Affairs and Housing and the Ministry of Transportation on data collection, analysis, and performance tracking to fully understand any future implications of the proposed changes to the Growth Plan on transit-related outcomes. This is particularly important to help Metrolinx consider the changing demographics and experiences of current and future transit customers.

Metrolinx continues to advance the implementation of the GGH Growth Plan through the 2041 RTP by advancing transit projects in the region. The priority for provincial land use policy in the Growth Plan, as it applies to transit planning, investment and development, should be the intensification of Major Transit Station Areas. Integration of transit and land use can only help to fully achieve the benefits of GO Expansion, rapid transit projects and transit-oriented development.

Strengthening the alignment of transit and land-use planning will also enable Metrolinx to continue optimizing the cost-effectiveness of provincial transit investments. As we know, giving priority to those areas where investments are being made will ultimately contribute to their overall impact. We look forward to continuing to work together to advance our shared goals for the Greater Golden Horseshoe.

Sincerely,

Leslie Woo,
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