



Toronto Transit Commission
1900 Yonge Street, Toronto, ON M4S 1Z2
416-393-4000

August 2, 2023

Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
13th Floor, 777 Bay Street
Toronto, ON, M7A 2J3

Via email: growthplanning@ontario.ca
Via online commenting: [ERO number 019-6813](#)

Re: Proposed Provincial Planning Statement

The Toronto Transit Commission (TTC) is pleased to provide comments to the Ministry of Municipal Affairs and Housing (MMAH) regarding the proposed Provincial Planning Statement (PPS).

Overall, TTC is supportive of the additional language proposed in the PPS on transit-supportive development, the efforts made to define transportation and transit as critical infrastructure, and the emphasis placed on protecting for corridors. TTC appreciates the addition of policies in the proposed PPS that better reflect the important role that transit infrastructure plays through physical structures (facilities and corridors) that form the foundation for development.

TTC has suggested some revisions which would strengthen the proposed PPS policies and further advance the goals and policies identified as matters of provincial interest. Please find below a table outlining TTC's comments and recommendations pertaining to TTC's review of the proposed PPS.

TTC's review and comments focus on the impact of development on adjacent lands to TTC's transportation system with regard to the following outcomes:

1. Ensuring TTC's ability to protect and ensure safe operations in the interest of public safety;
2. Advancing TTC's efforts to upgrade our system to adhere to present day legislative requirements including the Accessibility for Ontarians with Disabilities Act (AODA) and the Ontario Building Code (OBC); and
3. Encouraging opportunities for integrated developments that achieve or facilitate these outcomes while increasing the supply of land needed for housing development.

Jon Burnside, Chair
Joanne De Laurentiis, Vice-Chair
Richard J. Leary, Chief Executive Officer

Paul Ainslie, Commissioner
Stephen Holyday, Commissioner
Fenton Jagdeo, Commissioner
Ron Lalonde, Commissioner

Nick Mantas, Commissioner
Chris Moise, Commissioner
Julie Osborne, Commissioner

Letter to: Ministry of Municipal Affairs and Housing Provincial Land Use Plans Branch
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Should there be any questions regarding the contents of this letter, please contact Matt Kavanaugh, Development Manager, at 647-209-8625 or Matthew.Kavanaugh@ttc.ca.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pamela Kraft".

Pamela Kraft
For: Gary Downie
Chief Capital Officer
Engineering, Construction, and Expansion

03074-95-3305

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Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument ([ERO number 019-6813](#))

TTC staff comments on the proposed Provincial Planning Statement:

Proposed PPS Policy	Comment	Recommendation
2.4	Strategic Growth Areas	
2.4.2.3 (b)	TTC appreciates the desire to broadly define major trip generator, but finds the language proposed to be too ambiguous.	Revise policy 2.4.2.3 to read: b) there are a limited number of residents and jobs associated with the built form, but a major trip generator <u>(including a healthcare facility, post-secondary institution, or major facility)</u> or feeder service will sustain high ridership at the station or stop
2.4.2.6	TTC encourages connections between developments and transit stations to provide better access to public transit. Integrating transit and development uses together on the same parcel of land within MTSAs also represents a better use of limited land resources while unlocking more land for housing. However, without stronger policy language, opportunities to realize these benefits remain a challenge.	Revise policy 2.4.2.6 to read: All major transit station areas should be planned and designed to be transit-supportive and to achieve multimodal access to stations and connections to nearby major trip generators by providing, where feasible: a) connections to local and regional transit services to support transit service integration; b) <u>connections to developments or integration of developments with transit stations and corridors;</u> c) infrastructure that accommodates a range of mobility needs and supports active transportation, including sidewalks, bicycle lanes, and secure bicycle parking; and <u>d) e)</u> commuter pick-up/drop-off areas.
3.1	General Policies for Infrastructure and Public Service Facilities	
3.1.1 (b)	Leveraging the capacity of development proponents, where appropriate, is already a fundamental component of ongoing efforts to modernize TTC's transportation system. However, efforts to do so have been challenging and stronger policy direction is needed.	Guidelines are sought on how transit agencies are expected to "leverage the capacity of development proponents".
3.2	Transportation Systems	

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3.2.2	<p>Connections within and among transportation systems and modes are important. However, connections to adjacent developments are also a critical component of a well-connected transportation system. TTC has numerous connections to adjacent developments throughout its network, and additional language is suggested to promote these connections to reflect their importance.</p>	<p>Revise policy 3.2.2 to read:</p> <p>Efficient use should be made of existing and planned infrastructure, including through <u>connections with development on adjacent lands and</u> the use of transportation demand management strategies, where feasible.</p>
3.3	Transportation and Infrastructure Corridors	
3.3.1	<p>The proposed definition of “higher order transit” refers to transit that “generally operates in partially or completely dedicated rights-of-way”. To strengthen the intent of policy 3.3.1 to protect for these corridors, TTC suggests that the same definition be used.</p>	<p>Revise policy 3.3.1 to read:</p> <p>Planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit <u>including higher order transit,</u> and electricity generation facilities and transmission systems to meet current and projected needs.</p>
3.3.3	<p>TTC appreciates that this policy gives stronger policy support for municipalities to refuse applications that may not be compatible with planned corridors.</p> <p>The policy refers to “existing or planned corridors”. “Existing” is not defined and it is not clear to TTC whether the definition of “Planned corridors” includes TTC’s higher order transit. TTC suggests that “higher order transit” as defined in the proposed PPS be added. Otherwise, TTC requests that “existing” corridors be defined and include “higher order transit”.</p> <p>In the interest of public safety, it is also recommended that “negative impacts” and “adverse effect” as</p>	<p>Revise policy 3.3.3 to read:</p> <p>Planning authorities shall not permit development in <u>existing or</u> planned corridors that could preclude, or <u>cause any negatively affect impacts, or cause any adverse effect on</u> the use of the corridor for the purpose(s) for which it was identified.</p> <p>New development proposed on adjacent lands to existing or planned corridors, <u>higher order transit</u> and transportation facilities should be compatible with, and supportive of, the long-term purposes of the corridor and should be designed to avoid, or where avoidance is not possible, minimize and mitigate negative impacts <u>and any adverse effect</u> on and from the corridor and transportation facilities.</p>

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	defined in the proposed PPS be used to determine whether permitting development in planned corridors could preclude the safe operation of transportation systems.	
3.3.6	To better achieve PPS objectives to optimize transit investments, and to leverage development proponents on adjacent lands, TTC suggests inclusion of an additional Transportation and Infrastructure Corridors policy based on a modified version of policy 3.3.5.	Addition of policy 3.3.6 to read: <u>The integration of transit infrastructure and facilities should be promoted within the development of adjacent lands, where appropriate.</u>
3.3.7	TTC takes public safety very seriously. In lieu of recommended revisions to policy 3.3.3, an alternative policy (based on a modified version of policy 5.3.1) is proposed to protect the general public from the hazards posed by tunnel punctures or collapses during construction of adjacent development.	Addition of policy 3.3.7 to read: <u>Development on, abutting or adjacent to lands with existing or planned heavy rail (such as subways, elevated or surface rail, and commuter or regional inter-city rail) corridors and facilities may be permitted only if measures to address and mitigate the risk to public health and safety through known or suspected negative impacts or adverse effect to the corridors and facilities are under way or have been completed.</u>
7	Definitions	
Adjacent lands	<p>Definition and policy 3.3.3 both refer to “existing or planned corridors”. “Existing” corridors is not defined and it is not clear to TTC whether the definition of “Planned corridors” includes TTC’s higher order transit. TTC suggests that “higher order transit” as defined in the proposed PPS be added. Otherwise, TTC requests that “existing” corridors be defined.</p> <p>To support the integration of transit infrastructure within developments as a means to increasing land available for housing, TTC suggests references</p>	<p>Revise definition to read:</p> <p>a) for the purposes of policies <u>3.2.2</u>, 3.3.3 <u>and 3.3.6</u>, those lands contiguous to existing or planned corridors, <u>higher order transit</u> and transportation facilities where development would have a negative impact <u>or an adverse effect</u> on the corridor or facility.</p> <p>Note: 3.3.6 is a proposed new policy identified above</p>

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	<p>to policies 3.3.2 and 3.3.6 be added to the definition.</p> <p>To maintain safe transportation systems per policy 3.2.1, TTC recommends the addition of “adverse effect” as defined in the proposed PPS.</p>	
Major transit station area	<p>Definition states that a major transit station area can be the “area including and around a major bus depot in an urban core.” However, “major bus depot” and “urban core” are not defined. TTC has many bus facilities that are not associated with a higher order transit station. Furthermore, “major bus depot” excludes streetcar facilities.</p>	<p>Provide additional policy direction on how municipalities are to interpret “major bus depot” and “urban core”.</p>
Multimodal	<p>Definition includes “rail”, but is ambiguous as to interpretation with respect to whether streetcars or subways are included in commuter rail.</p>	<p>Revise definition to read:</p> <p>means relating to the availability or use of more than one form of transportation, such as automobiles, walking, cycling, buses, streetcars, subways, LRT, rail (such as commuter and freight), trucks, air, and marine.</p>

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Negative impacts	<p>Definition is appreciated, but transit stations and corridors will always have ongoing needs to ensure legislative compliance with AODA and OBC requirements to improve accessibility for people of all ages and abilities per policy 2.1.4 (b) and ensure safe transportation systems per policy 3.2.1.</p> <p>However, TTC stations and corridors are being enclosed by development. It is not TTC's intention to preclude development of lands adjacent to stations and corridors (integration with development is preferred), however, additional language is suggested to better define "Negative impacts" to strengthen efforts to minimize and mitigate the impact of new development on the safety and accessibility of existing transportation systems per policy 3.3.3.</p>	<p>Revise definition to read:</p> <p>c) in regard to policy 3.3.3, any development or site alteration that would compromise or conflict with the planned or existing function, capacity to accommodate future needs including safety and accessibility, and cost of implementation or upgrading of the corridor</p>
Planned corridors	<p>TTC is supportive of this definition, however, it is not clear whether TTC's higher order transit is included in the definition of "Planned corridors".</p>	<p>Clarify the following:</p> <ol style="list-style-type: none"> 1. What is defined as a "corridor"? 2. Is TTC's higher order transit included in "corridors and future corridors", as noted in the definition of "Planned corridors"? 3. If TTC infrastructure is not included in "corridors and future corridors", what definition of corridor applies to TTC's existing higher order transit? 4. What is the difference between "corridors", as noted in the definition of "Planned corridors", and "existing corridors" as referenced throughout the proposed PPS?
Transit-supportive	<p>TTC recommends additional language be added to the definition of "Transit-supportive" to strengthen opportunities for the integration of transit infrastructure within development on adjacent lands that</p>	<p>Revise definition to read:</p> <p>in regard to land use patterns, means development that makes transit viable, optimizes investments in transit infrastructure, and improves the quality of</p>

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	<p>improves accessibility for people of all ages and abilities per policy 2.1.4 (b) and ensures safe transportation systems per policy 3.2.1.</p> <p>Further, the recommended language also assists with leveraging the capacity of development proponents, where appropriate, per policy 3.1.1 (b), prioritizing intensification in proximity to transit corridors and stations per policy 2.2.1 (d), and improving access to stations within MTSAAs per policy 2.4.2.6.</p>	<p>the experience of using transit, <u>including safety and accessibility</u>. It often refers to compact, mixed-use development that has a high level of employment and residential densities, including:</p> <ul style="list-style-type: none"> a) air rights development, in proximity to transit stations, corridors and associated elements within the transportation system; <u>and/or</u> b) <u>integration of transit stations or corridors within developments.</u>