

May 28, 2015

Coordinated Land Use Planning Review

Submission to the Ontario Ministry of Municipal Affairs and Housing

Introduction

The Pembina Institute supports Ontario's land use planning initiatives and its efforts to improve them as part of a coordinated 10-year review. The Greenbelt Act and Places to Grow Act are marquee pieces of provincial legislation. When effectively and securely enforced, they can ensure the long-term protection of water and agricultural land, while also improving quality of life as we grow in our urban centres.

The importance of Greenbelt protection

Agriculture is the most significant land use in the Greenbelt, accounting for 43% of its total area.¹ The annual economic impact generated by primary agriculture production in the Golden Horseshoe was \$6.3 billion in 2011.² Forests in the Greenbelt store 40 million tonnes of carbon and sequester 137,000 tonnes of carbon annually, or an average of 0.75 tonnes of carbon per hectare each year.³

It is critical that we do not shrink or compromise the Greenbelt and that we fully protect the Oak Ridges Moraine and Niagara Escarpment as well. As the impacts of climate change grow more severe, it becomes even more critical that the province protects headwaters, land for carbon sequestration and agricultural land to feed Ontarians as our population grows. It is also prudent to defer development of the whitebelt for the same reasons, in hopes of protecting agricultural and ecologically significant lands within the whitebelt.

These important considerations also align with Ontario's climate change goals. If development continues further and further away from urban centres, and prioritizes car-dependent communities, congestion and the associated carbon emissions will increase. This would undermine both the province's climate goals and its planning objectives.

An effective Growth Plan

To this effect, the Pembina Institute would like to see measures that enhance the effectiveness of the Growth Plan, in order to concentrate as much growth as possible in built-up areas. This would help preserve the Greenbelt, the Niagara Escarpment and the Oak Ridges Moraine, while also eliminating any need to develop the whitebelt.

This submission for the coordinated review focuses on the *Growth Plan for the Greater Golden Horseshoe* (henceforth referred to as "the Growth Plan"). In particular, it examines the need for stronger intensification requirements along transit lines and around mobility hubs. The reasons for this focus are threefold:

¹ JRG Consulting Group, *Agriculture by the Numbers: Understanding the Greenbelt's Unique Advantages* (Friends of the Greenbelt Foundation, 2014). https://d3n8a8pro7vhmx.cloudfront.net/greenbelt/pages/1167/attachments/original/1426519521/Agriculture_by_the_Numbers-Corrected.pdf?1426519521

² Golden Horseshoe Food and Farming Alliance, *Agriculture and Agri-Food Economic Profile for the Golden Horseshoe* (2014). <http://www.planscape.ca/planscapePDFs/70-plan1.pdf>

³ David Suzuki Foundation, *Carbon in the Bank: Ontario's Greenbelt and its Role in Mitigating Climate Change* (2012), 18. <http://www.davidsuzuki.org/publications/reports/2012/carbon-in-the-bank-ontarios-greenbelt-and-its-role-in-mitigating-climate-change/>

- Given the rapid population growth in the region, it is critical to maximize the number of homes with easy access to transit, as well as the number of households that can give up a car by using transit instead. This will have a significant impact in terms of reducing traffic congestion, while also improving air quality and contributing to Ontario's climate goals.
- Robust ridership is needed to cover the cost of ongoing operations for transit lines. To secure those ridership levels, the province must ensure that enough residents and jobs are located in developments along these transit lines.
- Optimal development is necessary to drive economic activity and generate revenue. For example, the City of Toronto intends to fund SmartTrack and possibly other transit projects using tax increment financing, which relies on future development. For those plans to succeed, planning targets and policies are required to ensure that development and land value capture actually occur.

This submission therefore puts forward two policy solutions to direct more development to transit lines and hubs:

1. Improve Growth Plan targets and implementation to better direct growth to transit areas, including setting intensification targets for transit corridors, stations and mobility hubs
2. Require optimal densities for provincially funded transit lines and ensure coordination with the Big Move review

Ontario deserves credit for the leadership it has shown on planning policy to date, particularly with the creation of legislation like the Places to Grow Act and the Greenbelt Act. We believe that the recommendations contained in the submission build on those successes, and would help improve the province's development patterns going forward.

Review of current provincial policy and its impacts

1. Trends in homebuyer preferences

The evidence shows that the Growth Plan has already driven intensification in the region's built-up areas. Since 2009, more multi-family units have been built than any other type of dwelling in the Greater Toronto and Hamilton Area.⁴

This trend is important because it matches changing demand in the region. Homebuyers increasingly want to live in more walkable and livable neighbourhoods. Surveys in 2012 and 2014 by the Royal Bank of Canada and the Pembina Institute found that an overwhelming majority of residents of the Greater Toronto Area favour neighbourhoods that are walkable, close to work and accessible by rapid transit — even if living in those areas means choosing a smaller home.

Nevertheless, 82% of respondents in the most recent survey said that price, not preference, is the primary determinant of where they live. Homebuyers looking for family-friendly homes are often priced out of these “location-efficient” neighbourhoods in urban centres. Instead, they are driven to more distant, car-dependent areas where they can afford a single-family home.

Increasing the supply of homes with transit access should therefore be a key priority for the province. To do that, the density of developments around transit lines will have to increase. Currently there are a number of obstacles to creating more density, both commercial and residential, in location-efficient neighbourhoods. Some of these are presented in a recent report by the Pembina Institute and the Ontario Home Builders Association.⁵ The province has a role to play in removing barriers to growth around transit corridors and stations, as well as avenues where there is demand.

2. Municipal performance in meeting Growth Plan targets

The Growth Plan sets intensification targets for urban growth centres (UGCs), requiring a minimum density for new developments. These density targets range from 150 to 400 residents and jobs per hectare, depending on the area, as can be seen in Table 1. The guidelines in the Growth Plan also include a stated intensification target of 40% for new growth in built-up areas and 60% for greenfield areas, as well as a minimum of 50 jobs and residents per hectare for designated greenfield areas.

In terms of policy compliance, all 21 upper- and single-tier municipalities in the Greater Golden Horseshoe (GGH) have amended their official plans to conform to the Growth Plan.⁶ However, their actual performance is mixed. Eight of those 21 municipalities are not achieving the minimum intensification rate, based on 2012 property assessment data.⁷

⁴ Calculated using data from Statistics Canada. For more details, see: Cherise Burda, *Priced Out* (Pembina Institute, 2015), 27. <http://www.pembina.org/pub/2502>

⁵ Cherise Burda and Mike Collins-Williams, *Make Way for Midrise* (Pembina Institute, 2015). <http://www.pembina.org/pub/make-way-for-mid-rise>

⁶ Neptis Foundation, *Implementing the Growth Plan for the Greater Golden Horseshoe* (2013), 4. http://www.neptis.org/sites/default/files/growth_plan_2013/theneptisgrowthplanreport_final.pdf

⁷ Ontario Growth Secretariat, *Performance Indicators for the Growth Plan for the Greater Golden Horseshoe* (2015), 6-7. <http://www.mah.gov.on.ca/AssetFactory.aspx?did=10849>

Table 1: Density targets for urban growth centres⁸

Density (residents and jobs per hectare)	Urban growth centres
400	City of Toronto growth centres (Downtown, Etobicoke, North York, Scarborough)
200	Downtown Brampton, Downtown Burlington, Downtown Hamilton, Downtown Milton, Markham Centre, Mississauga City Centre, Newmarket Centre, Midtown Oakville, Downtown Oshawa, Downtown Pickering, Richmond Hill/Langstaff Gateway, Vaughan Corporate Centre, Downtown Kitchener and Uptown Waterloo
150	Downtown Barrie, Downtown Brantford, Downtown Cambridge, Downtown Guelph, Downtown Peterborough and Downtown St. Catharines

There are some leaders when it comes to setting intensification targets: from the inner ring, the City of Toronto and the Region of Peel both plan to exceed their minimum targets.⁹ In the outer ring, the Region of Waterloo plans to exceed its minimum density target for intensification in built-up areas.¹⁰

Unfortunately municipalities that exceed targets are exceptions to the rule. When it comes to UGCs, 23 of the 25 centres have adopted the minimum density targets set out in the Growth Plan. Only two UGCs — Toronto’s Yonge-Eglinton Centre and downtown Hamilton — have density targets that exceed their Growth Plan minimums (483 and 250 residents and jobs per hectare, respectively).¹¹

In most cases, actual performance does not live up to these targets. Based on 2011 Census and National Household Survey data, most municipalities are far from achieving their 2031 UGC minimum density levels, with only three nearing their targets.¹²

The distribution of targets within regions is also a cause for concern. For example, Halton Region as a whole meets the minimum density of 50 jobs and residents per hectare in designated greenfields. But the lion’s share of intensification is directed to Milton, which has a target of 58 residents and jobs per hectare. Most municipalities in Halton have targets below the minimum — as low as 39 residents and jobs per hectare in the case of Halton Hills.

Even when regions comply with targets, not all municipalities are meeting them. That suggests a need for more effective enforcement. This performance also suggests a need for complementary targets for transit corridors and hubs, which would help municipalities with their overall compliance. The need for complementary targets is discussed further in the following section.

⁸ Ministry of Infrastructure, *Growth Plan for the Greater Golden Horseshoe* (Government of Ontario, 2006), 16. <https://www.placestogrow.ca/content/ggh/2013-06-10-Growth-Plan-for-the-GGH-EN.pdf>

⁹ Ontario Growth Secretariat, *Performance Indicators*, 40.

¹⁰ Region of Waterloo, *Official Plan* (2010), 16.

http://www.regionofwaterloo.ca/en/regionalGovernment/resources/CHAPTER_2_FINAL_MODIFICATIONS.pdf

¹¹ Ibid, 60-61, Table 3.8.

¹² Ontario Growth Secretariat, *Performance Indicators*, 9. The three are downtown Hamilton, Yonge-Eglinton centre and North York centre. Note that downtown Toronto does not meet its target as the area is large and includes many low-rise, low-density neighbourhoods such as the Annex, the University of Toronto and undeveloped railway lands. A map is available online:

https://www.placestogrow.ca/index.php?option=com_content&task=view&id=372&Itemid=15#downtown

3. Lack of linkage between targets and transit investment

The Growth Plan includes policies for growth management and intensification in UGCs, major transit station areas, intensification corridors, employment lands, greenfield areas and rural areas. In particular, sections 2.2.3.6 and 2.2.5 of the Growth Plan instruct municipalities to designate major transit station areas and intensification corridors outside of UGCs. They recommend that these areas have higher residential and employment densities to support existing and planned transit services. They also instruct municipalities to develop and implement through, their official plans and other supporting documents, a strategy and policies to phase-in and achieve intensification. This includes recognizing intensification corridors and major transit station areas as a key focus for intensification and minimum density targets that are consistent with the planned transit service levels, as well as any transit-supportive land-use guidelines established by the province.

Hard density targets are set for the UGCs themselves. However, targets do not exist either for transit corridors within the UGCs, or for major planned and existing transit infrastructure that extends beyond the boundaries of the UGCs (this includes transit corridors, station areas and mobility hubs). Setting intensification targets for transit corridors and station areas is left to the discretion of individual municipalities, many of which fail to do so.¹³ As a result, development does not always fully leverage transit investments across the region in order to create liveable and walkable communities around this infrastructure.

Existing and recommended densities around higher-order transit

The Ontario Growth Secretariat recently released an assessment of performance indicators for the Growth Plan, which includes an analysis of major transit station area densities.¹⁴ We have compared these densities, both existing and planned, to Metrolinx's 2011 *Mobility Hub Guidelines*, which suggests land use densities for mobility hubs based on the transit technology in question.¹⁵

Table 2 presents the recommended densities for existing, as well as planned or under construction, transit station areas in the GGH. The table shows how many of these station areas, by mode, meet the optimal density recommended by the *Mobility Hub Guidelines*.¹⁶ It paints a stark picture: the station areas that performs best are around subways, yet only 31% of subway stations currently meet the recommendations for optimal density. (Detailed density performance for transit corridors is available in Appendix A.)

¹³ The Growth Plan states that major transit station areas and intensification corridors will be designated in official plans and planned to achieve densities to support existing and planned service levels. However, no actual targets are required or recommended. See "2.2.5 Major Transit Station Areas and Intensification Corridors" in the Growth Plan.

¹⁴ Ontario Growth Secretariat, *Performance Indicators*.

¹⁵ Metrolinx, *Mobility Hub Guidelines* (2011), 23.

<http://www.metrolinx.com/en/projectsandprograms/mobilityhubs/MobilityHubGuidelines.pdf>

¹⁶ Ibid.

Table 2: Transit station areas and *Mobility Hub Guidelines* density recommendations¹⁷

	Metrolinx recommended density (residents and jobs per hectare)	Total number of stations	Number of station areas currently meeting target density	Percentage of station areas currently meeting target density
Existing station areas				
Subway	250+	68	21	31%
Light Rail Transit	200-400	6 (SRT)	0	0%
Bus Rapid Transit	100-250	16	1	6%
Regional Rail ¹⁸	50-200	63	14	22%
Station areas for planned transit lines¹⁹				
Subway	250+	6	0	0%
Light Rail Transit	200-400	100	5	5%
Bus Rapid Transit	50-200	27	1	4%
Regional Express Rail ²⁰	150-200	63	2	3%

Implications for transit infrastructure

This poor performance speaks to the need for increased density along existing transit lines, as well as for future transit investments.

In terms of existing transit infrastructure, provincial investments in rapid transit infrastructure have not always delivered optimal densities. When we look at the Spadina subway line north of Bloor, not a single station area has the necessary density to support subway service. The current density around stations in that corridor ranges from 32.8 residents and jobs per hectare at Downsview station to 110.3 at Dupont station — in all cases well below the recommended minimum of 250. A northward extension of that corridor is currently under construction, and improved policies could drive higher densities to avoid this same fate.

¹⁷ Ontario Growth Secretariat, *Performance Indicators*; Metrolinx, *Mobility Hub Guidelines*, 23. Please note that we compare 2011 densities of major transit station areas to recommended densities for mobility hubs as defined in Metrolinx's *Mobility Hub Guidelines* in 2011. This comparison is not perfect: according to Metrolinx, mobility hubs vary in size but usually comprise a high-order transit station and an 800-metre radius area around the station. Major transit station areas also vary in size, as they are designated in municipal official plans. Where the station areas or their sizes are not identified in municipal plans, we analyzed an area that includes the transit station and the 500 metres surrounding it.

¹⁸ Regional rail comprises the existing GO rail network and current service frequencies.

¹⁹ This includes both under construction and planned for the future. Planned major transit station areas where the transit technology was unknown were excluded.

²⁰ Regional express rail is the enhancement of regional GO rail services to provide high-speed, frequent and reliable long distance travel across the region. See: Metrolinx, *Mobility Hub Guidelines*, Table ii.3.

Left unaddressed, these problems can persist for many years. As can be seen in Figure 1, transit lines such as the Danforth subway have remained under-developed for decades after they have been built. Of the subway stations that do reach optimal densities, most are located downtown.

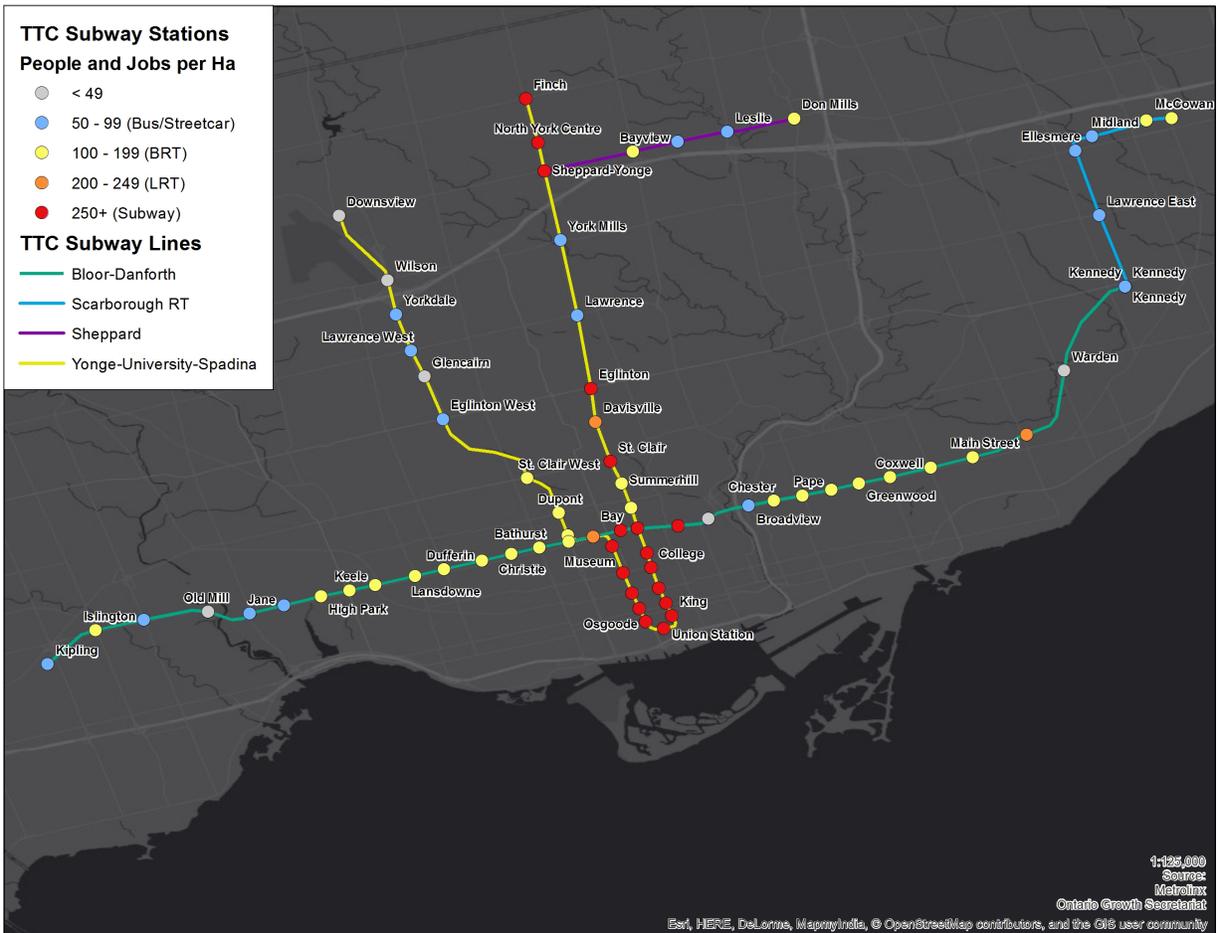


Figure 1: Subway stations and density of surrounding areas

Given how long these lines have been operating, it is clear that the status quo will not lead to significant intensification. But more growth could be directed to these existing transit station areas and corridors through changes to the Growth Plan as is discussed in the final section of this submission.

Density around subways is clearly a concern, but the performance is also poor for other modes. Most GO stations are surrounded by low-density development, with only 19% of GO station areas currently meeting recommended density levels, as is shown in Figure 2.

A review of individual stations, using data from 2011, suggests that planned transit lines will be surrounded by the same low densities unless provincial planning policies are strengthened. For example, express rail requires densities of 150 to 300 residents and jobs per hectare.²¹

²¹ According to Metrolinx, express rail is the enhancement of regional rail services to provide high-speed, frequent and reliable long-distance travel across the region. Mobility hubs served by express rail should have land use targets that reflect the high regional level of service provided by express rail. Metrolinx, *Mobility Hub Guidelines*, 23.

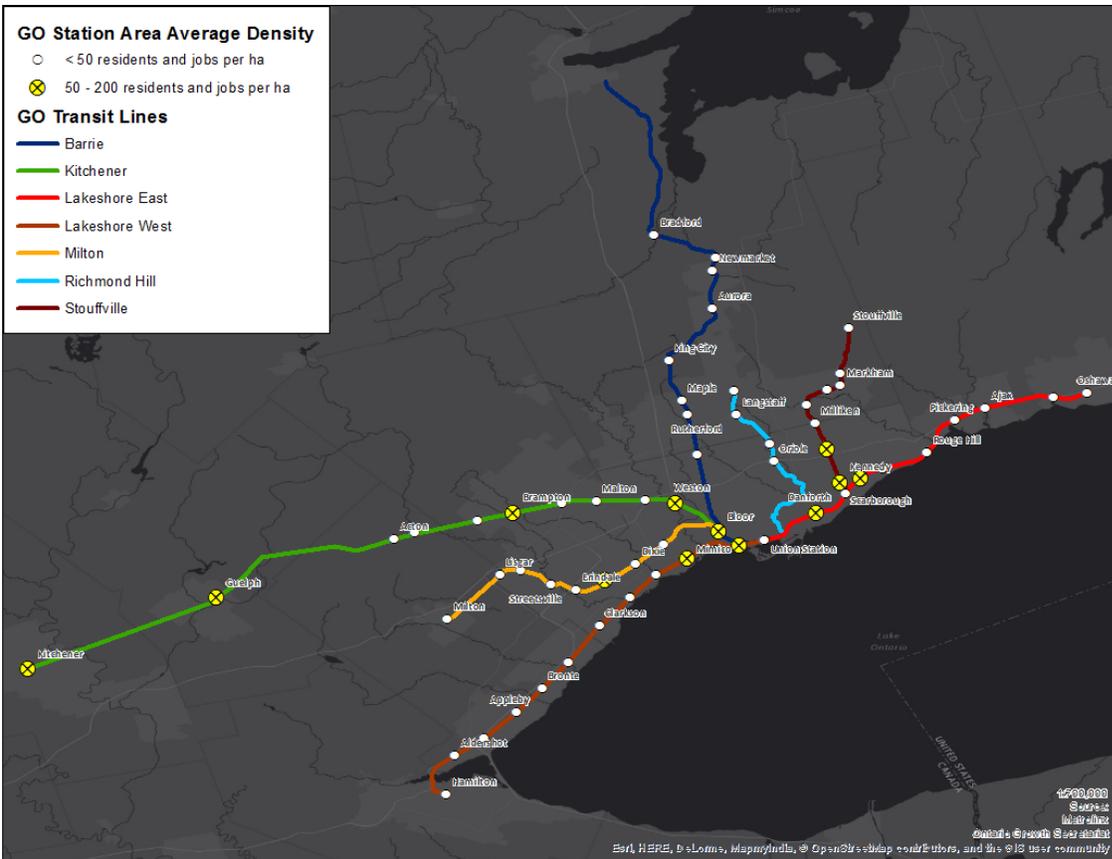


Figure 2: GO Transit stations and density of surrounding areas

When we look at the eight existing GO train stations that would be part of the planned SmartTrack line, only one of them currently has the density required to support express rail service.²² This is particularly important for a project like SmartTrack, which is partly funded through tax increment financing. Measures are necessary to ensure that densities are reached along which maximize value uplift and provide the revenue needed for the project.

Given that 81% of existing GO train stations areas in the region do not meet optimal densities, and that other modes also perform poorly, there is clearly room for improvement: more effective implementation of Growth Plan targets is needed, or specific transit intensification targets are required. Similarly, the low projected densities for planned stations shows the need for stronger mechanisms to increase density along new transit lines.

This is critical if the province's investments in a region-wide transit network are to prove successful. The GGH is still a car-reliant region on the whole. Car trips account for more than 70% of all trips taken in the inner ring municipalities, and over 90% of all trips in outer ring municipalities.²³ This pattern remained relatively unchanged from 2006 to 2011, with only a marginal shift toward greater car use in the outer ring.²⁴ Without a more transit-oriented pattern of development, we can expect the status quo to persist.

²² Our analysis is limited to these eight stations because they are the only ones for which data is available.

²³ Ibid.

²⁴ Ibid, 30.

Policy solutions to direct more development to transit lines and hubs

Below we present two policy solutions to direct more growth to transit station areas and corridors. These solutions can be complementary. Both suggest the need for some sort of minimum density or intensification requirement for transit areas.

It is important to note that these are high-level proposals for improving provincial policies. Building transit infrastructure can create development opportunities and increase property values, and land value capture provides an opportunity to direct some of those benefits to municipal governments. Municipalities should therefore retain the capacity to both meet target densities make the most of land value capture opportunities. Tools like Toronto's development permit system could play a role in making provincial and municipal interests work together, and the 2016 review of the Big Move provides an opportunity to more fully explore the potential of land value capture.

1. Improve Growth Plan targets and implementation to better direct growth to transit areas, including setting intensification targets for transit corridors, stations and mobility hubs

The evidence presented in this submission suggests that the discretionary process for setting and achieving intensification and density targets is not achieving the goals of the Growth Plan, particularly with respect to transit-supportive development. This issue could be addressed through better enforcement of current Growth Plan targets. It could also be addressed by strengthening those targets — for example, by increasing the minimum intensification target — or through the creation of new targets that promote intensification around transit corridors and stations, as well as mobility hubs.

There is already a precedent for a transit-oriented approach to targets. At least two major municipalities in Ontario — the City of Ottawa²⁵ and the City of Hamilton²⁶ — have already set some form of minimum density targets for transit areas in their official plans.²⁷ The creation of these targets should also take place with LVC in mind, in order to ensure that the economic benefits from development are accessible to municipalities. Tools like Toronto's development permit system could be integrated into the process of designating transit areas and setting targets.

²⁵ The City of Ottawa has set out and applied minimum density targets for certain target areas “with the greatest potential to support the rapid transit network.” Such target areas include mixed-use centres (minimum density targets ranging from 160 to 250 residents and jobs per hectare), arterial main streets (minimum density targets ranging from 120 to 200 residents and jobs per hectare) and transit-oriented development areas (minimum density targets ranging from 120 to 175 residents and jobs per hectare). See: City of Ottawa, *Ottawa Official Plan*, Section 2.2.2, Policies 6-7 and Figure 2.3.

http://documents.ottawa.ca/sites/documents.ottawa.ca/files/documents/section_02_en.pdf

²⁶ The City of Hamilton sets out a “hierarchy of Urban Nodes” that includes downtown Hamilton, “Sub-Regional Service Nodes which are major centres of retail activity to the City, and Community Nodes which act as focal points to a former local municipality or to a number of neighbourhoods” and provides density targets for each node in its official plan. The official plan indicates that sub-regional service nodes will contain major transit stations and sets a density target of 100 to 150 residents and jobs per hectare across each of these nodes. City of Hamilton, *Hamilton Official Plan*, Policies 2.3.2.6, 2.3.2.7. <http://www.hamilton.ca/NR/rdonlyres/0A939735-8827-4D79-8C54-B01970515106/0/UHOPVol1PoliciesrevOct2013.pdf>

²⁷ *Ottawa Official Plan*, Section 2.2.2, Policy 7; *Hamilton Official Plan*, Policy 2.3.

Setting targets for transit areas

One avenue for implementation involves creating targets for the areas surrounding transit stations. As of 2012, 333 major transit station areas (MTSAs) had been designated in the GGH. MTSAs are defined as “the land within a 500-metre radius (approximate ten-minute walking distance) of an existing or planned higher order transit station in a settlement area, or of a bus depot within an urban core” for the purposes of this indicator.²⁸ Focusing on MTSAs is promising because they have the potential for significant intensification: over 43% of them have densities of less than 50 residents and jobs per hectare (based on municipal plans in 2012 and 2011 Statistics Canada data).

A first step for directing more growth to transit areas is to ensure MTSAs and intensification corridors are properly designated. As of now, these areas are generally designated by municipalities in their official plans. The province could supplement municipal efforts in designations in one of two ways. The first is to designate specific MTSAs and intensification corridors under the Growth Plan, comparable to how the province has already designated urban growth centres under Growth Plan (Schedule 4). The second is to grant Metrolinx or the Ministry of Transportation explicit authority to designate MTSAs and intensification corridors when municipalities have not already done so. The ministry’s *Transit-Supportive Guidelines* indicate that mobility hubs, a subset of MTSAs, are “identified by Metrolinx”, suggesting that some of the authority to designate MTSAs and intensification corridors already rests with Metrolinx.²⁹

Once these areas are designated, new transit-oriented targets can be put in place. As with designation, there are two options for setting targets. The first is to set minimum intensification targets for MTSAs and corridors under the Growth Plan. These targets would have to conform with provincial transit policy and recommended densities, such as Metrolinx’s recommended densities for mobility hubs or the Ministry of Transportation guidelines. The other option is for Metrolinx or the ministry to set these targets directly. The latter approach would allow for an evolving set of targets, informed by expert input and based on changes to transportation plans and needs.

Improving existing targets

There are also opportunities to improve existing Growth Plan targets to direct more growth toward transit stations and corridors.

The province could add conditions or performance requirements relating to upper-tier municipality allocations of jobs and people to, and the setting of intensification and density targets for, lower-tier municipalities under Growth Plan policy 5.4.2.2. Another strong measure would be to condition approval of settlement boundary expansions on the demonstrated achievement of intensification and density targets. To that end, the comprehensive review process that is currently required to approve boundary expansions could include an additional section regarding transit-oriented development.

Greenfield density targets could also be altered in a number of ways to better support transit. The most straightforward change is to simply increase the minimum density targets in designated greenfield areas, which would help provide the density needed to support higher levels of transit service. For example, the City of Calgary is now planning for 60 residents and jobs per hectare in all greenfield areas.³⁰

Another option is to require that every new development in a designated greenfield area meets the minimum density target, rather than just the area as a whole. And finally, the province could eliminate

²⁸ Ontario Growth Secretariat, *Performance Indicators*.

²⁹ Metrolinx, *Mobility Hub Guidelines*, 211.

³⁰ City of Calgary, *Municipal Development Plan* (2009), 3-20 and 3-21. <http://www.gccarra.ca/wp-content/uploads/2015/01/mdp-municipal-development-plan.pdf>

“alternative” intensification and density targets, which municipalities have used to adopt targets lower than the minimums provided in the Growth Plan.³¹

2. Require optimal densities for provincially funded transit lines and ensure coordination with the Big Move review

When billions of dollars are being spent on public transit projects, it is critical to ensure that this public money is invested effectively. That includes taking full advantage of opportunities to build more homes and workplaces in close proximity to new transit lines, which improves the quality of neighbourhoods and contributes to the Growth Plan’s goals.

Some municipalities have proactively developed plans for higher densities along transit corridors after receiving provincial funding for rapid transit lines: these include Mississauga, Kitchener-Waterloo and Toronto in the case of the Eglinton Crosstown LRT. However, this positive behaviour has not occurred everywhere. And there are no requirements for density and housing diversity that municipalities must meet as a prerequisite for provincial transit infrastructure funding. As a result, there is no mechanism to ensure that areas around future rapid transit lines will meet optimal densities.

Table 3 below, which reiterates some of the findings from Table 2, shows that very few of the planned MTSAAs currently meet recommended densities. There is therefore a need to be proactive at this stage of infrastructure investment, to ensure that density in these areas will increase and that development potential is maximized.

Table 3: Planned transit station areas and *Mobility Hub Guidelines* density recommendations³²

	Recommended density (residents and jobs per hectare)	Total stations planned/under construction	Percentage of station areas currently meeting target density
Subway	250+	6	0%
Light Rail Transit ³³	200-400	100	5%
Bus Rapid Transit	50-200	27	4%

In addition, Figure 3 shows the current density around the eight proposed SmartTrack stations for which data is available. The only station that currently meets optimal density for express rail is Union station.³⁴ Four stations meet minimum densities for regular GO train service, and three do not even attain that lower level. The plan to fund SmartTrack includes both provincial funding and tax increment financing, so intensification around these stations is critical to make the project a success.³⁵

³¹ Under sections 2.2.3(4) and 2.2.7(5) of the Growth Plan, the Minister of Infrastructure may permit municipalities to adopt alternative minimum intensification and density targets, respectively, in certain situations.

³² Ontario Growth Secretariat, *Performance Indicators*; Metrolinx, *Mobility Hub Guidelines*.

³³ This does not include the recently announced LRT in Hamilton.

³⁴ Frequent service as defined by: Metrolinx, *Mobility Hub Guidelines*.

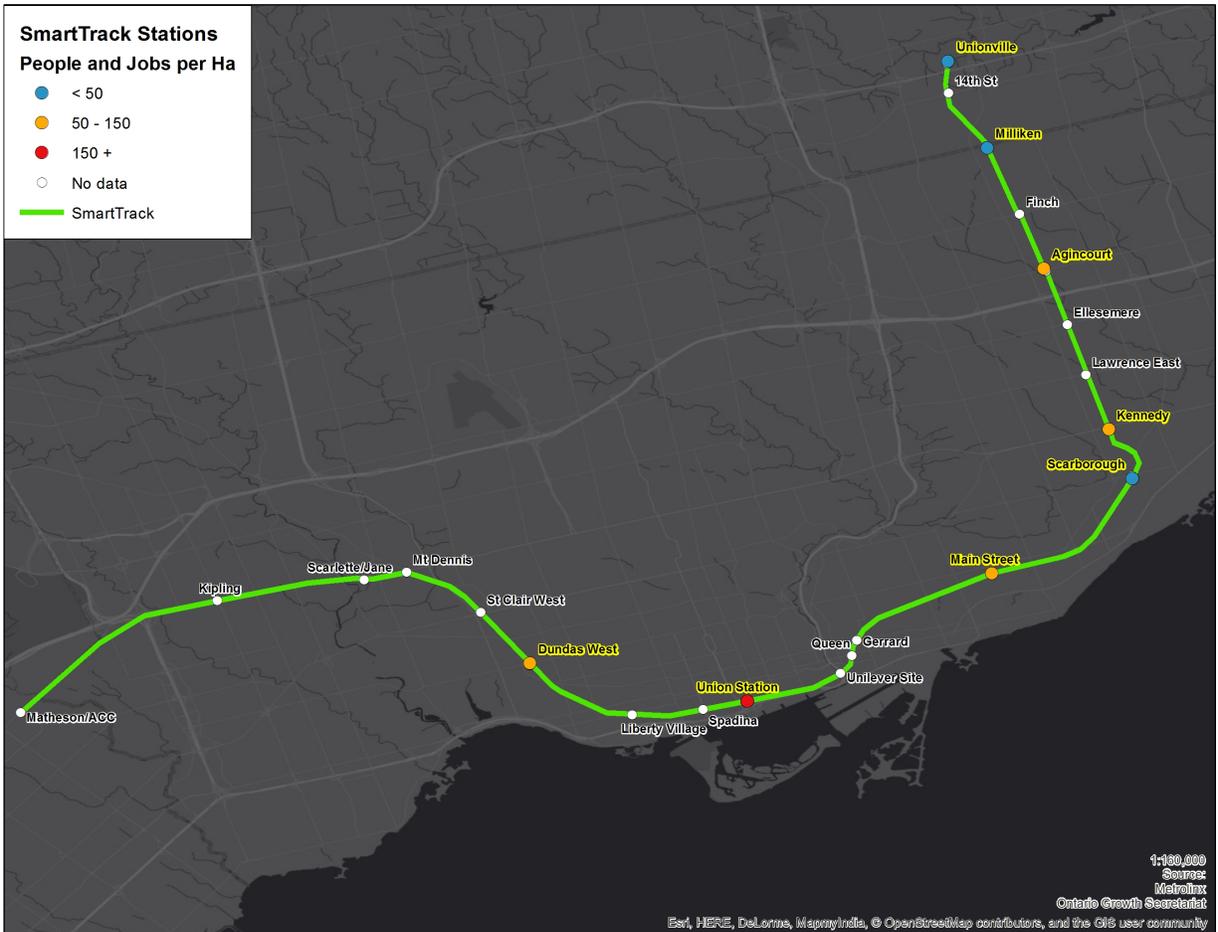


Figure 3: SmartTrack stations and density of surrounding areas

Implementing transit density requirements

Establishing transit intensification or density targets in the Growth Plan, as outlined in the previous section, would obviously help ensure that these densities are achieved around transit lines throughout the GGH. The province could also potentially use the transportation planning policy statement (TPPS) or the Metrolinx Act to require minimum densities when provincial funding is provided. Such a mechanism would be useful as Ontario moves forward with the Big Move, its largest transit investment in decades. Tying this investment to increased densities would help ensure that development along new transit lines meets its potential, providing healthy levels of ridership and development revenue.

In terms of the legal mechanism, it is not entirely clear that either Metrolinx’s regional transportation plan or the TPPS could directly override municipal planning laws that are otherwise compliant with the Growth Plan. However, the Ministry of Transportation could potentially use its powers under section 31.1 of the Metrolinx Act to issue a TPPS that includes minimum density or intensification targets for MTSAs and intensification corridors (see Appendix B for more details). In order to take full advantage of enforcement powers, the Minister would need to designate the minimum targets as “designated policies” within the TPPS.

The province could also factor the results of sub-area assessments on transit and transportation systems into its transit investment decisions,³⁶ and facilitate the achievement of minimum transit-related intensification plans.³⁷ For instance, funding from Metrolinx for rapid transit lines could only be provided for projects in intensification corridors that have either achieved the minimum density targets, or those with strong secondary official plans to support the necessary density.

Ensuring coordination with the Big Move review in 2016

All of the considerations presented in this submission show that in the GGH, planning for transit and growth need to be better coordinated and integrated. As a recent report by Neptis concludes, “there is a lack of integration between the Growth Plan and the regional transportation plan *The Big Move*, partly because the creation of a regional transportation agency and a long-range transportation plan came after the introduction of the Growth Plan. Neither plan attempts to direct a certain percentage of growth to particular transit-accessible locations across the region.”³⁸

The upcoming Big Move review in 2016 should therefore be informed by Growth Plan indicators and priorities, to ensure that the region is achieving transit-oriented densities in the appropriate areas. This review provides an opportunity to review the plan through the lens of MTSA density targets, and to consider options to tie public investment to density requirements.

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³⁶ The Growth Plan instructs various ministries to undertake “sub-area assessments” on a number of different topics including “further work on the proposed transportation network (s.5.3.4.b). The sub-area assessment in this case likely looks at implementation of the plan. Policy 3.2.1(3) of the Growth Plan also provides that “[t]he Minister of Infrastructure will work with other Ministers of the Crown and other public sector partners to identify strategic infrastructure needs to support the implementation of this Plan through multi-year infrastructure planning through the sub-area assessment of transit and transportation . . . systems.” Policy 3.2.2(4) also states “[t]hrough sub-area assessment, the Ministers of Transportation and Infrastructure, in consultation with municipalities and other stakeholders, will undertake further work to implement the transportation network and policies of this Plan.

³⁷ Policy 2.2.3(8) provides that “Ministers of the Crown and municipalities will use infrastructure investment and other implementation tools and mechanisms to facilitate intensification.”

³⁸ Neptis Foundation, *Growing Pains: Understanding the new reality of population and dwelling patterns in the Toronto and Vancouver regions* (2015). <http://www.neptis.org/publications/growing-pains-understanding-new-reality-population-and-dwelling-patterns-toronto-and>

Appendix A: Density along transit corridors

In 2008, Metrolinx published average density statistics for higher-order transit lines. We have compared these reported average densities around transit lines to the recommendations from Metrolinx's *Mobility Hub Guidelines* to determine which corridors may require intensification in order to support higher-order transit services.³⁹ The results can be seen in Table 4.

This corridor-level analysis produces similar results to the higher-level analysis presented earlier. The Yonge-University-Spadina subway line and subway lines within downtown Toronto meet the recommended density levels to support subway services. The other subway lines currently do not, nor are they projected to do so in the future. However, please note that these numbers are for entire corridors, which average out the densities and therefore cannot match the proposed densities of mobility hubs.

The recommended density for GO rail service is from 50 to 200 residents and jobs per hectare. Since the minimum required density is fairly low, most of the GO train lines meet the minimum density recommendations, with the exception of the Georgetown corridor.

The recommended density for express rail — a higher-frequency, high-speed variant of regional rail service — ranges from 150 to 300 residents and jobs per hectare. This density does not currently exist on any of the GO train lines, although Brampton, Mississauga and Richmond Hill are projected to reach these levels by 2031. None of the planned LRT or BRT corridors currently have, or are projected to have, the required density to support these services.

Table 4: Existing and projected density by transit corridor⁴⁰

Transit line	Average density within 500 metres (residents and jobs per hectare)	Average projected density	<i>Mobility Hub Guidelines</i> density	Currently meets target?	Projected to meet target?
Express Rail					
Lakeshore (West)	75	107	150-300		
Lakeshore (East)	118	138	150-300		
Brampton	137	160	150-300		✓
Mississauga	144	214	150-300		✓
Richmond Hill	122	178	150-300		✓
Regional Rail					
Stoney Creek	51	72	50-200	✓	✓

³⁹ Our analysis assumes that Metrolinx is reporting on a 500-metre radius around the entire line, and not just around transit station areas. That means the figures may underestimate density around stations, which is the most important factor to support rapid transit service.

⁴⁰ Metrolinx. *Mobility Hub Guidelines*, 23; Metrolinx, *Backgrounder: Modelling Methodology and Results for the Regional Transportation Plan* (2008), 26-28.
http://www.metrolinx.com/thebigmove/Docs/big_move/RTP_Backgrounder_Modelling.pdf

Milton	45	67	50-200		✓
Georgetown	131	180	50-200	✓	✓
Barrie	76	102	50-200	✓	✓
Richmond Hill	101	168	50-200	✓	✓
Stouffville	96	144	50-200	✓	✓
Subway					
Bloor-Danforth	130	157	250+		
Yonge-University-Spadina	273	341	250+	✓	✓
Sheppard	83	113	250+		
Spadina	31	50	250+		
Yonge	56	104	250+		
Scarborough RT	N/A	N/A	250+		
Downtown Core	277	326	250+	✓	✓
Light Rail Transit					
Eglinton Ave	72	82	200-400		
Finch West	59	71	200-400		
Sheppard East	68	102	200-400		
Hurontario-Main Street (Mississauga)	46	75	200-400		
Hamilton King/Main	78	93	200-400		
Bus Rapid Transit					
VIVA Highway 7 (York)	28	60	100-250		
VIVA Yonge (York)	30	47	100-250		
Dundas Street BRT (Brampton)	49	75	100-250		
Brampton Queen Street	37	65	100-250		

Appendix B: The Metrolinx Act and TPPS

There are several arguments that could be used to support the claim that the Minister of Transportation has the authority to set specific transit-supportive density targets for some areas within the regional transportation area as part of his or her “transportation planning” authority under s. 31.1(1) of the Metrolinx Act. These arguments could include the following:

- Although “transportation planning” is not defined in the Metrolinx Act, the act does require that Metrolinx “promote transit-supportive development to increase transit ridership and to support the viability and optimization of transit infrastructure” under s. 6(2)(i), which clearly articulates the link between optimal transportation planning and transit-supportive development.
- The TPPS is required under s. 31.1(2)(b) to “have regard to” the transportation plan adopted by Metrolinx (currently the Big Move). That plan provides requirements for municipalities to prepare detailed master plans for mobility hubs, including major transit station areas, that establish minimum density targets that conform to the Growth Plan *and* are based on the planned transit service levels in the Big Move. This would presumably mean that the density targets currently stated in the Growth Plan are minimums, as opposed to upper limits.
- In developing a TPPS under s. 31.1(2)(c), the minister must ensure that the TPPS is “in alignment” with the Growth Plan. As discussed above, the current Growth Plan provides strong qualitative (though not quantitative) direction for municipalities to increase transit-supportive development (see Growth Plan s. 2.2.5 as one example).
- Recognition and support for the use of a TPPS to promote transit-supportive or transit-oriented development can be found in Metrolinx’s 2013 Investment Strategy and the Ontario Home Builders’ Association climate change submission to the Ministry of Environment and Climate Change.
- If the Minister of Transportation has the authority to set specific transit-supportive density targets in a TPPS, as discussed above, these targets can also be declared “designated policies.” The Metrolinx Act provides four mechanisms for enforcing designated policies:
 - Municipal and provincial decisions under the Planning Act and related advice must be consistent with designated policies.
 - A designated policy prevails over an official plan or zoning by-law in the case of conflict.
 - A transportation master plan adopted by a municipality must be consistent with designated policies.
 - Municipalities and their boards and agencies are prohibited from undertaking public works or passing by-laws that conflict with a TPPS.

Metrolinx also has some authority over investment decisions as presented Section 6(1) of the Metrolinx Act. In carrying out its objects as described in subsection 5(1)(a), the agency is obliged to:

“(b) fund, or arrange and manage the funding for, integrated transportation across the regional transportation area;

(c) promote and facilitate co-ordinated decision-making and investment in the regional transportation area among the governments of the municipalities in the regional transportation area and the federal and provincial governments in order to ensure the efficient and cost-effective resolution of matters of shared concern respecting transportation, including, the provision and the optimal use and location of transportation infrastructure, including highway and transit infrastructure...

(d) promote the safety, efficiency and protection of transportation corridors.”

It may also be possible for Metrolinx to set minimum density and intensification targets under its own transportation planning authority. However, the authorization to do so is not explicit, and such targets may not be as legally binding as policies designated under the TPPS. Three arguments could be made in support of such an approach:

- As with the Minister under the TPPS, Metrolinx is not given clear authority to set density or intensification targets within its jurisdiction. The likeliest powers under Metrolinx Act is the agency's power to "develop and implement management strategies and programs relating to transit and transportation demand."
- Metrolinx is also required to develop and adopt a regional transportation plan under s. 6(1)(a). This plan includes the obligation to "promote transit-supportive development to increase transit ridership and to support the viability and optimization of transit infrastructure" under s. 6(2)(i).
- In the Big Move, Metrolinx does not currently set quantitative minimum density or intensification targets above those required by the Growth Plan, However, an argument could be made that Metrolinx has the duty to do so in order to meet its obligation to promote transit-supportive development and the viability and optimization of transit infrastructure.