March 3, 2011

Ms. Heather Edwardson  
EBR Coordinator  
Ministry of Transportation  
Policy and Planning Division  
Transportation Planning Branch  
Environmental Policy Office  
301 St. Paul Street, Floor 2  
St. Catharines, ON  L2R 7R4

Draft Update of Ontario’s Transit-Supportive Guidelines  
EBR Registry Number:  011-1329

Dear Ms. Edwardson,

The Ontario Professional Planners Institute (OPPI) would like to thank the Ministry of Transportation for the opportunity to comment on the Draft Update of Ontario’s Transit-Supportive Guidelines.

Established in 1986, the Ontario Professional Planners Institute (OPPI) is the recognized voice of the Province’s planning profession and provides vision and leadership on key planning issues. Government, private industry, agencies, and academic institutions employ more than 3,000 practicing planners. In addition, we have approximately 500 student members. Members work in a wide variety of fields including urban and rural community development, urban design, environment, transportation, health and social services, housing, and economic development.

OPPI’s members help to develop supportive land use policies, Official Plans, Transportation Master Plans, Transit Plans, Land Use Master Plans and prepare, review and implement Secondary Plans and Plans of Subdivision. Throughout all of these efforts, the integration of transit, land use, and urban design is of paramount importance.

We have three sets of comments. The first comprises a direct statement by OPPI that fully endorses and supports the 2011 Transit-Supportive Guidelines, and the second makes additional statements and comments for suggested additions and enhancements. The third makes the case for a combined effort to promote and circulate the Guidelines to the widest possible audience in the Province of Ontario.
Endorsement of the 2011 Transit-Supportive Guidelines

OPPI sees the 2011 Ministry of Transportation Transit-Supportive Guidelines as an important and informative tool for all professionals involved in land use planning and the delivery of infrastructure.

Widespread and effective use of these Guidelines will benefit all Ontarians and provide the basis to successfully meet the transportation challenges of tomorrow. OPPI applauds the Ministry of Transportation, who has led this initiative, the consultants who have completed the work, and all others who have contributed to the document.

Suggested Additions and Enhancements

Our members are actively involved every day in many settings throughout the Province. Typical questions that planners are faced with include:

- How many people will take transit and what makes you think they will want to take transit?
- When will the enhanced and improved transit services be available and why should we accept more population and employment without these new services being available?

These typical questions have influenced our response and formation of suggestions. We want the guidelines to cover these questions as much as possible and to assist in communicating accurate responses to the public.

We recognize that some of the questions are part of a different decision making chain but the guidelines do provide an important source of information to assist in many matters that are important to the planning process.

The following suggestions are brought forward:

- The Settlement Areas Guidelines indicate that higher density nodes and corridors must be given a chance to fulfill their density levels before urban expansion can occur. While there is no disagreement with this guideline, it may be beneficial to identify the level of transit service that is expected within a settlement area to support the planned population and employment. In an effort to promote a healthy environment we offer the following example of a service standard to consider. If the average commute time in an automobile is, for example, one hour in the settlement area then transit should provide a coverage and service level to permit all individuals to complete the same one hour commute time with a combination 15 minute walk time and 45 minute transit travel time. In other words transit must provide an effective travel time alternative to the automobile. We recommend that the guidelines provide an expected transit service level by community / settlement area type;
• The Community Structure Guidelines especially sections 1.1.2, 1.1.3 and 1.1.7 provide very valuable planning decision making information. The illustrations use a maximum walking distance (800 meters) which typically relates to persons accessing a subway. It is evident through examining different types of transit services that the walking distance people are willing to accept decreases in a direct proportion to the transit service which is being accessed. Not only does the walking distance decrease (based on the transit service types described in section 1.1.7, subway down to basic transit) but the number of people who choose to take transit within a walking distance zone also decreases. We recommend a more refined walking distance definition by transit service type to assist decision makers;

• Since most of the communities, urban and rural will be involved with transit service forms such as dedicated rapid transit (LRT and bus-way), very frequent and basic transit service we believe it would be prudent to provide greater clarity and additional descriptions and illustrations for these transit service types and the expected adjacent land use formations, including walking distance relationships;

• In addition it would be very beneficial to indicate that walking distance is measured from a station or stop rather than any given point along a transit service route;

• A 30 minute walk per day has proven to be an effective way to enhance the health of persons. Perhaps the guidelines could incorporate a statement on walking and the benefits to health of taking a 15 minute to walk to transit at the beginning of the day (work trip) and a 15 minute walk from transit (home trip);

• The Implementation Guidelines state that the Development Charges Act of 1997 can be used to help off-set growth related capital costs including transit from levying new development. The reality is that the wording of the Act limits the levy ability to current and past transit service levels and not the service and equipment levels necessary to accommodate the increased population and employment levels being approved and planned. The Act requires modification along with new thinking and financial commitments to secure the transit services necessary to meet forecast demands.

Promotion and Circulation of the 2011 Transit-Supportive Guidelines

OPPI is committed to creating and fostering healthy communities in Ontario. Launched in 2006, our “Healthy Communities, Sustainable Communities” initiative emphasizes the importance of urban design, active transportation, green infrastructure, links between public health and land use planning, and strategies for collaborating on tangible actions for healthier communities. Land use planning plays a significant role in how transit and other modes are integrated into the community fabric. Planners also play a pivotal role in bringing together multiple partners and disciplines and in engaging their communities. Our membership is actively involved in the public process, private development, academia and numerous specialized disciplines and we would welcome the opportunity to play a key role in the distribution and implementation of the Transit-Supportive Guidelines.

We also wanted to inform you that OPPI’s 2012 OPPI Symposium is going to be held in the Town of Markham and will be focused on transportation. We are currently in the planning stages for this event and there is already considerable interest in the theme. We certainly would welcome your Ministry’s involvement in this event.
Thank you again for the opportunity to comment. We hope that this submission is helpful. Representatives from OPPI would be happy to meet with Ministry staff to further discuss our submission. To schedule a meeting or for further information, please contact Loretta Ryan, MCIP, RPP, Director, Public Affairs 416-483-1873, x226 or by e-mail at policy@ontarioplanners.on.ca

Sincerely,

Sue Cumming, MCIP, RPP
President
Ontario Professional Planners Institute