

November 21, 2025

Minister Sarkaria  
Ministry of Transportation  
777 Bay Street, 5<sup>th</sup> floor  
Toronto, Ontario M7A 1Z8

Dear Minister Sarkaria,

***Re: OPPI Feedback on ERO 025-1071: Prohibiting Vehicle Lane Reduction for New Bicycle Lanes***

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of Transportation's proposal to amend the Highway Traffic Act (HTA) to prohibit all municipalities from reducing motor vehicle traffic lanes when installing, implementing, or marking new bicycle lanes.

OPPI is the recognized voice of the planning profession in Ontario. With more than 5,000 members, OPPI serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum for developers, consulting firms, municipal governments and within the Ontario Public Service, other community agencies, and academic institutions. They work across a geographically diverse cross-section of Ontario in communities of all size.

Among our membership, OPPI has several transportation & transit specialists who work for municipalities, with government/government agencies or in private practice. We brought together a working group to review the ministry's recommendation and have the following guidance to share as you move forward with this proposal.

The overall goal of a municipal transportation plan is to balance mobility efficiency, safety, equity, and climate goals within right of ways.

Many municipal Transportation / Integrated Transportation Master Plans identify:

- Corridor-based cycling networks
- BRT / transit priority corridors
- Road widening projects that integrate multi-use paths or bike lanes

Ongoing collaboration with municipalities is needed to balance vehicle mobility with safety and multimodal efficiency for all road users. Lane-count preservation alone is not a reliable proxy for moving people and goods efficiently.

In addition to providing sufficient space for motorized vehicles, continuous cycling and walking facilities, integrated with transit:

- Reduces pressure on general traffic by shifting short trips to sustainable modes.
- Supports equitable access to employment, education, and services for residents who do not or cannot drive.
- Supports essential efforts towards municipal and provincial climate and health objectives.

Prohibitions, even with exemption processes, will slow down construction and opportunities for intensification as municipalities will require time to redesign and consult with local stakeholders on changes that may be committed but not yet constructed. Redevelopment, especially in constrained areas, may compel the municipalities to seek wider right of ways to ensure all users can be accommodated, even if vehicles lanes are not required, reducing developable land area and accruing more capital costing pressures which would be felt by either the developer or the public.

Municipalities need flexibility to allocate road space based on local context, data, and planning. While OPPI recognizes the province's intent to maintain efficient vehicle movement, a balanced approach is necessary and is consistent with the practices of municipalities across the Country and globe. Municipalities must retain the ability to determine how best to allocate road space based on local travel patterns and traffic conditions, long-term planning objectives, and network-level safety and mobility demands.

Prohibiting lane reductions for new bicycle lanes or cycling infrastructure (more broadly):

- Disrupts continuity of planned corridors that are being implemented segment-by-segment over many years which can lead to additional monies required for retrofit.
- Reduces cycling as a travel mode for first and last mile trips that link to transit stops and hubs and supports transit ridership which is counter to provincial directives focusing on transit enhancement and improvement.
- Risks increasing traffic at transit hubs where it is expensive to provide parking.
- Risks undermining established agreements between upper-tier and lower-tier municipalities for coordinated transit and active transportation projects (e.g., BRT with integrated cycling facilities) which may generate more delays in planning and operational processes.
- Requires revisiting completed EA Environmental Assessment (EA) studies, detailed designs, and recently constructed segments, delaying or fragmenting networks leading to more time and effort spent prior to project construction.

Converting general-purpose lanes into protected cycling facilities, multi-use paths or transit/HOV lanes is a key tool where rights-of-way are constrained. A blanket prohibition would:

- Constrain options to support school-area safety, main streets, and station-area mobility.

- Limit the ability to address documented safety issues through “road diets” and reallocation.
- Make it more difficult to close critical gaps in cycling networks in built-up areas.

Proposed regulation-making powers could preclude municipalities from widening roads initially for general-purpose lanes and later converting a lane to HOV or bus-only as demand warrants. It could also limit the potential to convert a general-purpose lane into other uses (e.g., on-street parking that supports main-street vitality, loading, or accessibility).

There needs to be a clear, case-by-case approval or exemption process that includes a carve-out for any projects which have already undergone a Class Environmental Assessment EA process.

The proposed requirement to seek ministerial approval to convert general-purpose lanes to cycling facilities introduces additional inefficiencies in the planning and design process. The relationship of this new approval mechanism to existing Class EA processes is unclear, creating a new, parallel process that sits at odds with the objective of “Building Faster.”

If the prohibition proceeds, it should be accompanied by a practical, timely, case-by-case exemption process that:


- Maintains the existing ability under the HTA to seek approval where lane reductions are justified.
- Integrates with existing, well-established Class EA processes.
- Provides clarity as to when in the planning and design process approval should be sought.
- Provides clear, published criteria for when lane reductions can be permitted to:
  - Support active transportation and transit objectives,
  - Address safety concerns,
  - Achieve desired levels of service across all modes, not just general traffic.

This approach would allow the province to meet its objectives while preserving professional, evidence-based judgement at the municipal level regarding the effective planning and design of multi-modal transportation systems that accommodate efficient movement of people and goods.

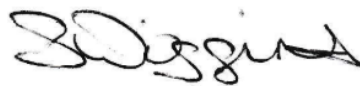
OPPI members stand ready to assist the Minister and staff team to resolve the issues that stand in the way of this proposal. We can help define “any other prescribed purpose” and the scope of additional prohibited activities and exemptions. We will collaborate with you to find solutions to Ontario’s congestion challenges that do not target one mode of transportation.

Thank you for the opportunity to provide feedback on the ERO 025-1071. We would be pleased to meet with you to discuss our recommendations related to motor vehicle traffic lanes and bicycle lanes. If you have any questions or would like to schedule a meeting, please do not hesitate to contact Susan Wiggins, Executive Director at (647) 326-2328 or by email at [s.wiggins@ontarioplanners.ca](mailto:s.wiggins@ontarioplanners.ca).

Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.  
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC  
Executive Director, OPPI