



Ontario
Home Builders'
Association

20 Upjohn Rd., Suite 101 (416) 443-1545
North York, Ontario Toll Free 1-800-387-0109
M3B 2V9 Fax: (416) 443-9982
<http://www.ohba.ca> info@ohba.ca

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Ministry of Transportation
Environmental Policy Office
777 Bay Street, Suite 700
Toronto, ON M7A 2J8

RE: Proposed Greater Golden Horseshoe Transportation Plan – Response to Discussion Paper (ERO # 019-3839)

The Ontario Home Builders' Association (OHBA) thanks the Ministry of Transportation for providing this opportunity to comment on the proposed Greater Golden Horseshoe (GGH) Transportation Plan (ERO # 019-3839). The OHBA is the voice of the land development, new housing, and professional renovation industries in Ontario. OHBA represents over 4,000 member companies, organized through a network of more than 27 local associations across the province including 11 local associations within the GGH.

The economic, job market and social prosperity of GGH residents is tied directly to an efficient and interconnected transportation system that enables families to live in communities they can afford, while getting to work and the places they want to reach. A strong and interconnected transportation system is also a key factor that underpins the GGH as being the economic engine of the country, generating upwards of 25% of Canada's GDP.¹ Ensuring that Ontario has the right transportation system in place is critical for the housing market to deliver accelerated housing options where future Ontario families want to live.

Growth Reality

The reality is that the population of the Greater Golden Horseshoe and the Greater Toronto Area continue to grow. The GGH continues to attract new residents that are bringing with them, their employable skills and talents, new investment, and business opportunities. Based on the Ministry of Transportation's population forecast outlined in the Greater Golden Horseshoe Transportation Plan Discussion Paper, the GGH population is forecasted to grow from 10 million people in 2019, to 14.9 million people by 2051, representing an increase of 4.9 million people.² These future Ontario residents and families need an affordable place to call home. Transportation connections are key considerations to couple with the growth reality of the GGH. Within the GGH, the GTA continues to be identified as the fastest growing region in North America.

¹ [A Place to Grow Growth Plan for the Greater Golden Horseshoe](#), 2020, Introduction, Page 1.

² [Greater Golden Horseshoe Transportation Plan Discussion Paper](#), June 2021, Page 5.



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Ontario's population growth as a trajectory has accelerated over the past 5 years, further amplifying economic activity and immediate housing needs. Fundamentally, housing supply is a critical part of maintaining and growing the GGH and GTA economic engines. With trends toward remote work, housing demand is being driven outside of the GTA into broader portions of the GGH, where smaller municipalities are seeing a significant jump in housing demand and municipal desires for growth to address that demand. Added to this context are calls for the Federal Government's new intent to attract 1.2 million new immigrants to Canada over the next 3 years, with 60 per cent coming through the economic immigration pathway.³ In the past, the majority of those new immigrants make their home in the GTA, adding to the economic expansion and opportunities in the GGH.

As noted in the discussion paper, getting ahead of rapid growth is critical to ensuring Ontario's economy and families can prosper. However, it is essential that we underscore the growth and immigration trends, combined with new home-workplace dynamics which will add to the already immense demand for new housing across the GGH in communities of all sizes.

Transit-Oriented and Sustainable Communities & Other Priorities

Transit-Oriented Communities (TOC) are a pivotal part of the transportation solution to help address housing supply. Placing density directly attached to or by major transportation nodes/hubs provides direct connections to those who are transportation dependent while unlocking new economic opportunities along existing transportation corridors. OHBA has long been a strong supporter of Transit-Oriented Communities across the GGH. Our membership supports the provincial Growth Plan and its policies including density targets in Urban Growth Centres and Major Transit Station Areas (MTSAs) that encourage and facilitate the construction of Transit Oriented Communities. We support coordinated infrastructure investment towards strategic projects based on clearly defined priorities including the creation of vibrant, mixed use, transit-oriented communities. The expansion of "core" infrastructure (roads, transit, water, and wastewater) in support of delivering much-needed housing supply to a growing population should be a key priority for the provincial government.

OHBA has previously written in support of key legislation that has enabled the accelerated delivery of TOC and other transportation infrastructure including [Bill 171, Building Transit Faster Act, 2020](#) and [Bill 222, Ontario Rebuilding and Recovery Act, 2020](#). OHBA has also been encouraged by the significant investments in transportation-related infrastructure that the provincial government has already committed to and which will accelerate the construction of priority transit projects. In locations along the priority transit lines that would benefit from

³ [Government of Canada announces plan to support economic recovery through immigration](#), Government of Canada, October 30, 2020.



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more intensification, it is entirely appropriate to pre-zone for high-density housing supply and mixed-use / employment in these areas.

It is also important that the province enforce Section 26(9) of the Planning Act so that zoning bylaws are updated to truly conform to Official Plans where there is a clear provincial interest. For any higher order transit corridors that receive provincial funding for construction (including, but not limited to the four priority transit lines under Bill 171 and the Hamilton LRT) the provincial government should consider speeding up the planning process through Ministerial Zoning Orders in MTSAs and Urban Growth Centres in order to maximize the investment opportunity, accelerating the process as part of the economic recovery and supporting new Transit Oriented Communities. As part of the provincial Transit Oriented Communities strategy, and especially along the priority transit lines mentioned, OHBA has a number of additional recommendations:

- The provincial government should support all existing Urban Growth Centres and MTSAs.
- The provincial government should eliminate minimum parking standards on transit corridors and in MTSAs to support new housing supply and enhance housing affordability, while also setting a clear provincial 'transit first' directive rather than continuing to require an over-supply of automobile parking.

As an initial step, the provincial government should pilot the elimination of minimum parking standards to stimulate additional investment in new housing supply along the priority transit corridors identified above.

GGH Transportation Plan – Infrastructure Proposals

The discussion paper presents a vision for mobility in 2051. **Maps 1, 2 and 3** of the plan focus on Transit, Congested Roads, and Goods Movement respectively. Comments pertinent to the development industry are provided below. OHBA is in general agreement with the initiatives presented for transit, road congestion, and goods movement enhancements.

Map 1 identifies existing, committed, and possible rail and regional transit initiatives (including higher order transit) to get people moving on a connected transit system. The transit system proposed would eventually service Waterloo Region to Northumberland County, Niagara to Hamilton, Hamilton to Toronto, and Toronto to Barrie. Other initiatives include higher order transit focussed on the GGH from Burlington to Oshawa, LRT's including Hamilton, connection enhancements to Pearson Airport, and better service to the region's employment areas.



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We recognize that the plan is ambitious but is required to service the population areas and to accommodate housing demand. It will be important to identify the capital costs, budget commitments, and timings of the rail and transit enhancements identified in the transportation plan as soon as possible.

OHBA feels that these important aspects require further discussion with various stakeholders including the development industry before the transportation plan is approved in order to determine among other things phasing of the initiatives.

Map 2 identifies committed road widenings, new capacity expansions, and new planned and conceptual corridors to enhance capacity and performance on congested roads. Project deliverables include various stages of planning and design work such as the GTA West Corridor, Bradford Bypass, Cambridge-Brantford connection, and twinning of the Garden City Skyway in Niagara Region. Expansions to the existing highway network would include the Highway 401 central section and connections to the outer ring on Highways 400, 401, 403 and the QEW. These infrastructure improvements are all needed to accommodate the housing supply requirements and population needs within the GGH and beyond.

OHBA feels that these enhancements will require further discussion and scrutiny with Ministry staff to deal with costing, budget allocations, phasing, and timing. There is a direct relationship here regarding the timing of infrastructure projects relative to the housing supply initiatives of our industry.

Map 3 addresses planning for and managing the movement of freight and connected corridors to efficiently move goods across the region. The initiatives would take advantage of the road and rail networks presented. The implementation of goods movement enhancements is dependent on the road and rail initiatives shown on *Maps 1 and 2*. Goods movements significantly contribute to congestion on the road network and need to be monitored from a performance perspective.

OHBA feels strongly that goods movement at off-peak hours needs to be considered and addressed in conjunction with the areas that require focus and attention regarding congested roads.

GGH Transportation Plan – Planned Actions and Actions Underway

The MTO discussion paper presents seven interconnected short-term goals and indicates those planned actions and those underway for each. Those initiatives that are most relevant to the



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development industry are highlighted as follows. As such, the implementation of same is of high priority.

Goal 1 – Improve Transit Connectivity

Key actions that should be implemented immediately.

- Building new transit routes and stations in highly urban areas
- Working to provide two-way, all-day service every 15 minutes over core segments of the GO Transit rail network
- Working with Metrolinx and local transit agencies to improve service integrations and streamline fare structures in the GGH

OHBA feels that these actions will increase transit ridership with the hope of reducing congestion on the road network.

Goal 2 – Relieve Congestion

Key actions that should be implemented immediately.

- Expanding our highways and continuing to build out the managed lanes network
- Implementing bus bypass lanes on Highways 8 and 401 in the Region of Waterloo
- Completing route planning, preliminary design, and environmental assessment work for the GTA West Highway and Transit Corridor
- Advancing engineering and environmental assessment work for the Bradford Bypass (new four-lane controlled access freeway)

OHBA feels that the implementation of infrastructure projects such as these in conjunction with the development of transit-oriented communities will assist in reducing traffic congestion on the road network. The actions will also work towards enhancing sustainable initiatives within areas of housing development.



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Goal 3 – Give Users More Choice

Key actions that should be implemented immediately.

- Supporting community transportation in areas of the province that are unserved or underserved by transit services
- Opening-up the intercommunity bus sector to improve transportation options, support economic recovery, and reduce red tape for business

OHBA feels that improving access to and expanding options to make it easier to travel without an automobile are important on a go forward basis to reduce congestion on our road network and to assist in developing sustainable residential communities.

Goal 4 – Keep Goods Moving

Key actions that should be implemented immediately.

- Plan for and protect the capacity of the routes, corridors and facilities identified in the Strategic Goods Movement Network (coordinate freight planning and freight-supportive infrastructure across the region)
- Work with partners to encourage the use of Off-Peak Delivery (OPD) in municipalities across the province

OHBA feels that the initiatives related to the benefits of OPD are urgently needed and should be implemented immediately to reduce congestion on the road network that serves our residential communities.

Goal 5 – Safe and Inclusive

Key actions that should be implemented immediately.

- Improve user safety and security in the transportation system
- Develop and conduct coordinated emergency response plans
- Develop a framework for transportation access and inclusion



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OHBA feels that safety needs to be always front of mind and of high priority, and initiatives for our road network, transit system, and goods movement in this regard need to be implemented immediately.

Goal 6 – Future Ready

Key actions that should be implemented immediately.

- Reduce the impacts of transportation emissions on the environment and climate change
- Support the adoption of low and zero-carbon modes including the adoption of electric and hydrogen-powered cars, trucks, and transit vehicles
- Develop a strategy for low and zero-carbon charging and fuelling stations
- Explore technological and regulatory measures to reduce emissions in higher polluting vehicles
- Raise awareness of the benefits and opportunities associated with low and zero-carbon transportation options
- Become a North American hub for the next generation of electric vehicles
- Explore the creation of an innovation corridor

OHBA strongly feels that these actions are critical to address impacts on climate change by reducing the transportation sector's greenhouse gas emissions and therefore need to be accelerated immediately. The creation of an innovation corridor between the GTA and Region of Waterloo will be important to the recovery of the Ontario economy and to the economic welfare of the region. OHBA is of the position that the development of such a corridor will enhance the province's position as the North American leader in technological innovation.

Goal 7 – Connections Beyond the GGH

Key actions that should be implemented immediately.

- Advance highway rehabilitation projects in tourism areas such as the District of Muskoka and County of Haliburton
- Enhance connections within the Georgian Bay area, between the GGH and SW Ontario, and Craigeleith area to better support tourism and local mobility
- Advance planning and design work for the re-introduction of passenger rail service connecting Toronto and the GTA with Northeastern Ontario



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OHBA feels that these actions are of utmost importance and critical to support the tourism industry and economic wellbeing of the province.

Concluding Remarks

Ensuring that communities throughout the GGH have transportation and transit options is key to ensuring greater affordability and reducing urban sprawl. OHBA members and development proponents remain critical partners in accommodating the growth reality and building the housing supply and employment centres that Ontario families need now and in the coming decades.

OHBA has consistently supported the province's leadership role in advancing infrastructure projects to accommodate people and good and services movements of all types. Such infrastructure is critical to the community-building that our OHBA members provide. Improved access between communities across the GGH is vital to the province's economic health, prosperity, and sustainability.

OHBA is appreciative of the Ministry of Transportation's invitation to provide feedback and commentary on the discussion paper for the GGH Transportation Plan 2051. Our Association looks forward to and welcomes further dialogue and consultation with Ministry staff regarding the priorities and implementation of the strategic initiatives outlined in the transportation plan. Also, as the trend towards electrification continues, OHBA feels confident that we will see highway corridors become 'greener' and more sustainable in time.