



August 26, 2021

Hon Caroline Mulroney  
Minister of Transportation

**RE: Greater Golden Horseshoe Transportation Plan Consultation**

Dear Minister Mulroney,

This is the response of the Federation of Urban Neighbourhoods (Ontario) to the discussion paper re the 2051 Greater Golden Horseshoe (GGH) Transportation Plan.

According to the paper a 2051 GGH transportation plan will help:

- Prepare the transportation system to serve an expanding economy and population. By 2051, population and employment are forecasted to grow from 10 million to 14.9 million people, and 4.5 million to 7 million jobs, respectively.
- Identify necessary actions to address mobility and congestion in the GGH.
- Guide and support Ontario's transportation investment decisions.
- Coordinate strategic planning across the region for the next 30 years.
- Prepare for new technology and changes, "like automated vehicles and mobility as a service platform that could change the way we move around the region."

The discussion paper outlines initiatives and concepts that address mobility in the region and that are designed to "meet collective goals and transportation challenges of the future." The paper covers public transit, trucks, cars, cycling, walking, air, rail and marine. However the emphasis is clearly on highways. The potential plan will deliver major highway projects, including the GTA West corridor (413), Bradford Bypass, and twinning the Garden City Skyway. They will also look to expand highways at specific locations to help with congestion including the Highway 401 central section and connections to the outer ring on Highways 400, 401, 403, and the QEW. But there is no mention of the federal government's High Frequency Rail (HFR) expansion program.

The major justification for the plan is that "Infrastructure investments have not kept up and won't meet future needs on their own. Over the 15 year period of 2001-2015, travel demand on the highways grew three times faster than the rate of new road construction during this time". While this may be true it is problematic as the basis for future planning:

- (1) It assumes that transportation demand has to be met and cannot be modified by regional planning. Has the government considered ways of moderating the rate of GGH growth by steering activity to other parts of the province that would dearly love to have the growth that the GGH is facing?

- (2) It fails to understand the nature of “induced demand” – that road “improvements” do not effectively reduce congestion because, in short order after construction, road use increases to restore congestion.
- (3) Approximately 44% of the overall area of the GGH is farmland. The sole focus of the paper is on transportation without acknowledgement or consideration of transportation’s impact on rural/agricultural land (and Ontario food production and food processing industries).

We note that two highway projects (Highway 413 and Bradford Bypass) which we had previously opposed for these and other environmental reasons are held up as key examples of the government’s plan to fix congestion. Fortunately the Federal government has intervened to require an environmental assessment of the proposed Highway 413.

In addition we note that “highways” are not all the same. The paper does not distinguish between toll roads and “free” roads, and does not address the Province’s future plans in this regard. Compare the under-used Highway 407 built as a “relief road” for the Highway 401 with the constantly congested 401; where is the consideration of encouraging truck use of the 407, and penalizing truck use of the 401 in order to optimize the results of highway investment?

In summary, the discussion paper is full of predictable solutions that essentially continue the status quo. This is not good enough, especially considering the increasing public awareness and concern about the climate change emergency. The topic is critically important to the future of the Province, and there needs to be a serious effort to engage the public, and gather original thinking, which the paper demonstrates is clearly lacking.

Respectfully submitted,

*Geoff Kettel*

Geoff Kettel

President

Copies:

Premier Doug Ford, MPP

Hon. David Piccini, MPP, Minister of the Environment, Conservation and Parks

Hon. Steve Clark, MPP, Minister of Municipal Affairs and Housing

Hon. Greg Rickford, Minister of Northern Development, Mines, Natural Resources and Forestry

Hon. Lisa Thompson, MPP, Minister of Agriculture, Food and Rural Affairs

Jennifer K. French, MPP, NDP Critic, Transportation and Highways

Jessica Bell, MPP, NDP Critic, Housing and Urban Planning

Steven Del Duca, Ontario Liberal leader

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Resident Associations across Ontario