May 8, 2017

Dear Committee members,

I have been retained by Lawrence Park residents to provide expert planning opinion regarding the Lawrence Park Neighbourhood Investigation of Basement Flooding & Road Improvement Study Class Environmental Assessment (EA).

I am a member of the Canadian Institute of Planners and a Registered Professional Planner. One part of my work is to help municipalities understand how the built characteristics of our communities impact health. I co-authored Toronto Public Health’s *Active City: Designing for Health*, a guide for creating built environments that enable and encourage physical activity and improved health outcomes. The importance of the issue and work was recognized in 2015, when *Active City: Designing for Health* won the Ontario Professional Planners Institute’s Excellence in Planning Award and Healthy Communities Award.

Physical activity is good for health. However, our built environments can make it easy or hard to incorporate physical activity into our daily lives. Safe, convenient and pleasant pedestrian routes encourage physical activity. Design of pedestrian spaces must be inclusive and take into account the needs of people of all ages and abilities, particularly vulnerable users such as children, seniors and people with disabilities. Sidewalks are part of the solution.

Few would dispute these statements. Policies that support these ideas are repeatedly found in City of Toronto documents. Yet the EA’s recommended infrastructure improvements do not comply with these policy directions.

**The City of Toronto Official Plan** (June 2015 Consolidation) includes policies that indicate that:

- The City should actively pursue measures to increase the proportion of trips made by walking, cycling, and transit [Policy 2.4.3.b.i];
- New and existing City streets will incorporate a Complete Streets approach and be designed to perform their diverse roles by balancing the needs and priorities of various users and uses within the right-of-way, including provision for: the safe and efficient movement of pedestrians of all ages and abilities, cyclists, transit vehicles and users, goods and services vehicles, emergency vehicles, and motorists across the network; and ensuring the safety of vulnerable groups such as women, children, seniors and people with disabilities [Policy 3.1.1.5.a]; and
- Design measures which promote pedestrian safety and security will be applied to streetscapes [Policy 2.4.14].
The **Toronto Walking Strategy** (adopted by Council in 2009) establishes universal accessibility, safety and design excellence as guiding principles, including the idea that the safety of pedestrians takes precedence over all other modes of transportation. Action 3.1 of the Strategy calls for the construction of new sidewalks during road reconstruction and resurfacing on both sides of the street where missing.

The **Vision Zero Road Safety Plan 2017-2021** establishes the City of Toronto’s commitment to reducing traffic-related deaths and injuries to zero. The plan addresses safety for the most vulnerable users of our transportation system—pedestrians, school children, older adults and cyclists – and states that connected and continuous sidewalks provide a safer and more accessible walking environment. The plan calls for the enhancement of the existing Missing Links Sidewalk Program to install sidewalks in areas that have no sidewalks or sidewalks on only one side of the road during road reconstruction.

**Complete Streets Guidelines** prepared for the City of Toronto (but not yet approved by Council) provide guidance on the implementation of the City’s Official Plan vision for complete streets. The guidelines indicate that pedestrians are the safety priority in street design as they are the most vulnerable and have the highest rates of fatalities among road users. Creating a network of continuous sidewalks with dedicated space for pedestrians safely separated from cyclists and motorized vehicles is established as key principle of street design. In its description of street types, the guidelines indicate that all Neighbourhood Residential Streets and Neighbourhood Collector Streets should have sidewalks to ensure universal accessibility and pedestrian safety. The Complete Street Guidelines include a Residential Shared Street Type with no sidewalks. All modes mix together rather than being segregated into specific zones. These are pedestrian-priority streets where all modes are expected to travel no faster than walking speed and motor vehicle volumes are low.

City-wide policies are clear on calling for sidewalks or other safe pedestrian spaces on all streets. Specific projects are the opportunity to implement these policies and realize the aspirations that stand behind them: improved health, safety, accessibility and inclusivity. Instead, these high-minded policies are too often ignored or watered down when competing priorities arise in local decision-making.

The proposed EA solution is an awkward compromise that does not conform with City policy to create safe and inclusive pedestrian infrastructure. It includes new sidewalks on one side of the street for only 5 streets within the study area. The streets to be rebuilt with no sidewalks will continue to be “shared” but with no real amenities for pedestrians. In doing so, the recommendations fail to take advantage of the opportunity of road reconstruction to create a built environment which realizes the City’s principles and goals, an opportunity that comes along only every fifty years.
An alternative solution should be found that aligns with City policy direction, either through the addition of sidewalks or through a shared street design which is as safe, welcoming and accessible as a street with sidewalks.

Regards,

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