

Bill 60 - Fighting Delays, Building Faster Act, 2025

Opposition to Schedule 5: Highway Traffic Act Amendments Prohibiting Lane Reductions

Executive Summary

I oppose Schedule 5 of Bill 60, which would prohibit municipalities from reducing motor vehicle lanes when installing new bicycle lanes or other prescribed purposes. This provision contradicts core conservative principles including fiscal responsibility, municipal autonomy, evidence-based policy, and economic efficiency. The prohibition would lock municipalities into car-dependent infrastructure regardless of local conditions, prevent cost-effective transportation solutions, undermine democratic local decision-making, and ignore the established economic principle of induced demand.

Key concerns:

1. **Violates municipal autonomy** by centralizing transportation design decisions that properly belong at the local level
2. **Ignores traffic evaporation**, which has been seen in many other instances of changes to road design in multiple jurisdictions
3. **Undermines fiscal sustainability** by preventing municipalities from making cost-effective infrastructure choices
4. **Contradicts economic evidence** showing multi-modal streets support business vitality
5. **Compromises emergency response** by forcing all traffic onto congested roadways
6. **Ignores public health benefits** including of reduced collisions and active transportation
7. **Limits transportation choice**, reducing economic efficiency and individual freedom
8. **Ignores environmental and climate impacts**, locking in existing transportation technologies
9. **Is based on perception, not evidence**, and as such is not in the best interest of Ontarians
10. **Creates more red tape**, something the government says it wants to reduce.

1. Violation of Municipal Autonomy and Subsidiarity Principles

Bill 60's Section 195.3 represents unprecedented provincial micromanagement of local street design decisions. The provision states municipalities "shall not, by by-law or otherwise, reduce or permit a reduction in the number of marked lanes" for bicycle lanes or other prescribed purposes except as permitted by regulations.¹ This effectively requires provincial approval for routine municipal transportation planning decisions.

The principle of subsidiarity, increasingly recognized in Canadian jurisprudence, holds that decision-making authority should be exercised as close to affected citizens as possible.^{2,3} The Supreme Court of Canada has invoked this European principle to reframe municipal authority over local issues, aiming to "guarantee a degree of independence for a local authority in relation to a higher body or central government". Constitutional scholar Alexandra Flynn argues that while municipalities remain under provincial jurisdiction, the principle of subsidiarity should guide provincial legislative design to enable municipalities to act as governments deserving of deference.

Transportation planning represents precisely the kind of local decision-making where municipal governments, directly accountable to residents who use the streets daily, possess superior knowledge and democratic legitimacy. The City of Toronto's Official Plan explicitly calls for "complete streets" and reallocating road space to build cycling networks based on years of public consultation and data.⁴ Bill 60 substitutes ministerial political discretion for local evidence-based decisions on road safety.

¹ Bill 60 - Fighting Delays, Building Faster Act, 2025 'e2'80'93 Modern Mobility. *Environmental Registry of Ontario*, October 22, 2025. <https://ero.ontario.ca/notice/025-1071>

² Subsidiarity and Fiscal Federalism in Canada. *E-International Relations*, February 2, 2021. <https://www.e-ir.info/2021/02/03/subsidiarity-and-fiscal-federalism-in-canada/>

³ Flynn, Alexandra. The Case of Toronto's Ward Boundary Review: Operative Subsidiarity and Municipal Authority. *Osgoode Hall Law Journal*, 2019. <https://digitalcommons.osgoode.yorku.ca/cgi/viewcontent.cgi?article=3482&context=ohlj>

⁴ Ontario Bill 60: A Veto on a Safer, More Bikeable Ottawa. *Bike Ottawa*, October 29, 2025. <https://bikeottawa.ca/2025/10/30/ontario-bill-60-a-veto-on-a-safer-more-bikeable-ottawa/>

The Association of Municipalities of Ontario (AMO) has opposed similar provincial constraints on bike lane decisions, stating: "Municipalities, relying on local knowledge and community input, are best positioned to balance traffic flow with active transportation, road safety, and community needs".⁵ If residents perceive that the provincial government will simply overturn Council decisions, they risk disengaging from local democratic processes entirely.⁶

This centralization contradicts conservative principles favouring limited government and local decision-making. Section 195.4 further requires municipalities to provide the Minister with "any other information that the Minister may require", creating an undefined approval process with uncertain timelines that adds bureaucratic complexity rather than reducing it.

2. Traffic Evaporation: What Happens When Road Space Is Reallocated

Bill 60's premise—that preventing lane reductions will reduce congestion—fundamentally contradicts decades of transportation research on the phenomenon known as **traffic evaporation**. Rather than causing gridlock, a well-planned reduction in space for cars frequently leads to an overall decrease in traffic volume on affected corridors, while travel impacts and congestion are far less severe than predicted. This principle has been substantiated by international reviews as well as Canadian case studies.

One of the most influential studies in this field is the landmark review conducted by Cairns, Atkins, and Goodwin, which examined over 70 examples of road space reallocation in 11 countries. Their findings reveal that when car lanes are removed or repurposed, traffic levels typically fall by 11% to 25% across the entire affected area, with congestion—if present at all—proving significantly less than anticipated by critics of such projects.⁷ Toronto's own experience on Bloor Street West offers compelling

⁵ Bill 60, Fighting Delays, Building Faster Act, 2025. *Association of Municipalities of Ontario (AMO)*, October 27, 2025. <https://www.amo.on.ca/policy/land-use-planning-resources-and-climate-change/bill-60-fighting-delays-building-faster-act>

⁶ Toward Municipal Autonomy and Effective Local Governance. *City of Toronto*, January 6, 2025. <https://www.toronto.ca/legdocs/mmis/2025/ex/bgrd/backgroundfile-252136.pdf>

⁷ S. Cairns, S. Atkins and P. Goodwin. Disappearing traffic? The story so far. *Municipal Engineer* 151(1):13-22. March 2002

local evidence: after one car lane was replaced with a bike lane, vehicle volumes decreased by 16%, while delays for drivers were minimized through operational adjustments, such as signal changes. Safety was also improved, with a notable reduction in collision rates even as cycling volumes increased nearly 70%.

The mechanisms underlying traffic evaporation are well-documented. When road capacity for cars is reduced, travelers rapidly adapt by shifting to other routes, altering trip times, choosing alternative modes like transit, walking, or cycling, consolidating trips, or simply eliminating unnecessary journeys altogether. For instance, following the closure of a major street in Kajaani, Finland, over half of its former car traffic simply disappeared rather than migrating to adjacent routes.⁸ New York City's transformation of Times Square—removing traffic entirely from a key segment—led to substantial reductions both in vehicle volumes and traffic injuries, supporting the principle that well-implemented road space reallocation can remedy not only congestion but also safety concerns.⁹

Federal Highway Administration “road diet” studies further reinforce these findings, showing that streets with fewer car lanes and added pedestrian or cycling facilities maintain or even improve traffic flow for remaining vehicles, often with reductions in collision rates ranging from 19% to 52%.^{10, 11} The positive net effect occurs because intersections, rather than lane quantity, are the true limiters of capacity, and converting excess lanes into dedicated turn lanes or non-motorized facilities improves operations for all users.

Importantly, traffic evaporation differs fundamentally from induced demand, where adding road space results in more driving over time. Research demonstrates that the relationship is not symmetrical; removing lanes does not simply push congestion onto other streets but prompts broad behavioral change that can reduce total car usage and improve urban conditions. When municipalities support modal shift and trip adaptation with complete street designs—as shown on Toronto's Bloor Street, New York's Times Square, and key European projects—not only does congestion remain manageable,

⁸ Reducing roads can cause traffic to ‘Evaporate’. Rapid Transition Alliance. 2019-11-26 <https://rapidtransition.org/stories/reducing-roads-can-cause-traffic-to-evaporate/>

⁹ Dario Hidalgo. Traffic evaporation: What really happens when road space is reallocated from cars? *TheCityFix* 2021-02-18 <https://thecityfix.com/blog/traffic-evaporation-what-really-happens-when-road-space-is-reallocated-from-cars/>

¹⁰ Road Diet Guide. Johnson Drive, Mission, KS April 2017 <https://bikewalkkc.org/wp-content/uploads/2018/08/170404-Road-Diet-Guide.pdf>

¹¹ U.S. Department of Transportation, Federal Highway Administration. Appendix A – Road Diet Safety Assessment Studies <https://highways.dot.gov/safety/other/road-diets/road-diet-informational-guide/appendix-road-diet-safety-assessment-studies>

but the resulting streets become safer, more productive, and more inclusive for all residents.

3. Fiscal Irresponsibility and Infrastructure Maintenance Burdens

Ontario municipalities own and manage \$484 billion in infrastructure—more than provincial and federal governments combined.^{12, 13} The Financial Accountability Office estimates that 45% of municipal infrastructure requires repairs, creating a backlog of \$52.1 billion, with municipal roads representing the largest share at \$21.1 billion.^{14, 15} Municipalities are planning for between \$250 billion and \$290 billion in capital investments over the next ten years.¹⁶

Infrastructure must be maintained over 15-150 year lifespans depending on asset type.¹⁷ The FAO warns that "postponing repairs raises the risk of service disruption and increases the costs associated with municipal infrastructure over time". In this fiscal context, Bill 60's prohibition on lane reductions represents poor asset management.

Multi-modal street design—which may involve reducing vehicle lanes to add cycling infrastructure, wider sidewalks, or transit lanes—offers municipalities cost-effective transportation solutions. Transport Canada's research on Complete Streets demonstrates that these projects often cost the same or less than traditional car-only streets while delivering superior economic returns: "the average Complete Streets project costs just \$2.1 million compared to \$9 million for typical state transportation

¹² Municipal Infrastructure. *Financial Accountability Office of Ontario*, March 6, 2025. <https://fao-on.org/en/report/municipal-infrastructure-2021/43>

¹³ Municipal Infrastructure Briefing Deck. *Financial Accountability Office of Ontario*, August 2024. <https://fao-on.org/wp-content/uploads/2024/08/Municipal-Infrastructure-BriefingDeck-EN.pdf>

¹⁴ Nearly half of Ontario municipal infrastructure needs repair. *CBC News*, August 16, 2021. <https://www.cbc.ca/news/canada/toronto/ofao-infrastructure-report-1.6143888>

¹⁵ Municipal Infrastructure. *Financial Accountability Office of Ontario*, March 6, 2025. <https://fao-on.org/en/report/municipal-infrastructure-2021/41>

¹⁶ Finance, Infrastructure and Economy. *Association of Municipalities of Ontario*, October 27, 2025. <https://www.amo.on.ca/policy/finance-infrastructure-and-economy>

¹⁷ The Economic Benefits of Public Infrastructure Spending in Canada. *Manitoba Heavy Construction Association*, November 2010. https://www.mhca.mb.ca/wp-content/uploads/2010/11/The_Economic_Benefits_of_Public_Infrastructure_Spending_in_Canada.pdf

projects".¹⁸ Bicycle and pedestrian projects create 9.6 to 11.4 jobs per million dollars spent compared to only 7.8 jobs for road-only projects].¹⁹

By forcing municipalities to maintain oversized roads optimized solely for vehicles, Bill 60 locks in "costly, inefficient, and dangerous design from bygone decades, and prevents us from using our rights-of-way and road infrastructure to move more people, more safely, and more affordably".²⁰ This directly contradicts fiscal conservative principles of maximizing taxpayer value and efficient resource allocation.

Public infrastructure spending on productive assets generates GDP returns of \$1.43 per dollar in the short term and \$2.46 to \$3.83 per dollar over the long term. However, these returns depend on reducing private business costs through enhanced transportation networks. Banning multi-modal infrastructure that would provide transportation choice actually increases business costs by forcing all trips onto congested roadways.

4. Economic Impact on Business and Commercial Vitality

Bill 60's prohibition contradicts support for small business by undermining commercial district economic vitality. Research consistently demonstrates that pedestrian-oriented streets with multi-modal access generate higher business revenues than car-dependent corridors.

Toronto-specific research on Bloor Street bike lanes found that after installation, "the number of businesses that reported 100 customers or more per day increased," customer spending increased, and vacancy rates remained stable.²¹ The study

¹⁸ Complete Streets: Making Canada's roads safer for all. *Transport Canada*, 2012. https://publications.gc.ca/collections/collection_2012/tc/T41-1-72-eng.pdf1

¹⁹ How Complete Streets Help Businesses. *New Orleans Complete Streets Initiative*, August 2019. <https://nolacompletestreets.org/wp-content/uploads/2019/08/Complete-Streets-Handout.pdf>

²⁰ Ontario Bill 60: A Veto on a Safer, More Bikeable Ottawa. *Bike Ottawa*, October 29, 2025. <https://bikeottawa.ca/2025/10/30/ontario-bill-60-a-veto-on-a-safer-more-bikeable-ottawa/>

²¹ Economic Impact Study of Bike Lanes in Toronto's Bloor Annex Neighbourhood. *Toronto Centre for Active Transportation*, September 3, 2019. <https://www.tcat.ca/wp-content/uploads/2017/12/Bloor-Economic-Impact-Study-Full-Report-2019-09-03.pdf>

documented that "both before and after the bike lane, customers who arrived by foot or on bike reported higher levels of spending on Bloor Street than those arriving by car or transit". Similar analysis of Queen Street West in Toronto's Parkdale neighbourhood found that "non-drivers are statistically more likely to visit the shopping area multiple times per week and spend more per month than drivers".²²

Transport Canada's Complete Streets research confirms these benefits nationally: "safe and convenient pedestrian amenities boost foot traffic, which can increase retail sales along commercial streets by between 10% and 25%".²³ When Valencia Street in San Francisco narrowed traffic lanes to accommodate other users, "nearly 40% of merchants reported increased sales while 60% reported no change". Complete Streets projects increase property values by 8-10% for quiet streets versus noisy ones, and homes on streets with no through traffic command up to 9% price premiums.

Canadian research on walkability and property values confirms these patterns. Studies show "homes in walkable neighbourhoods tend to sell for more".^{24, 25} An 85% reduction in traffic translates into a 5% increase in property values after one year and 30% after 13 years. Downtown Yonge Street in Toronto demonstrates this relationship: pedestrian traffic represents 80% of all traffic flow, and retail recovery directly correlates with foot traffic levels.^{26, 27}

Commercial property tax revenue, which funds municipal services, depends on this business vibrancy. Toronto's commercial properties already pay tax rates 2.04 times higher than residential properties.²⁸ By forcing businesses to rely solely on congested

²² Bike Lanes, On-Street Parking and Business: A Study of Queen Street West in Toronto's Parkdale Neighbourhood. *Clean Air Partnership/Toronto Centre for Active Transportation*, 2016.

https://www.tcat.ca/wp-content/uploads/2016/12/Bike-Lanes-On-Street-Parking-and-Business_-A-Study-of-Queen-Street-West-in-Toronto%E2%80%99s-Parkdale-Neighbourhood.pdf

²³ Transport Canada. Complete streets: Making Canada's roads safer for all. March 2009.

https://publications.gc.ca/collections/collection_2012/tc/T41-1-72-eng.pdf

²⁴ How Walkability Affects Property Value. *No Worries Real Estate*, May 25, 2025.

<https://noworries.ca/how-walkability-affects-property-value/>

²⁵ The Importance of Walkability When Buying a Home in Ontario. *Ontario One Realty*, 2024.

<https://www.ontarioonerealty.com/walkability-buying-home-Ontario>

²⁶ Significant Increases in Foot Traffic for Downtown Yonge BIA in Toronto. *Retail Insider*, July 12, 2022.

<https://retail-insider.com/retail-insider/2022/07/significant-increases-in-foot-traffic-for-downtown-yonge-bia-in-toronto-facilitating-retail-rebound-interview/>

²⁷ Downtown Yonge Street in Toronto Sees Foot Traffic Exceed Pre-Pandemic Levels. *Retail Insider*, January 10, 2023. <https://retail-insider.com/retail-insider/2023/01/downtown-yonge-street-in-toronto-sees-foot-traffic-exceed-pre-pandemic-levels-interview/>

²⁸ Property Tax Explained. *Toronto Association of Business Improvement Areas (TABIA)*, May 12, 2025. <https://www.toronto-bia.com/property-tax-explained/>

car access and prohibiting street designs that enhance pedestrian activity, Bill 60 undermines the tax base supporting essential services.

The economic literature on Complete Streets demonstrates broader benefits. Smart Growth America's study of 37 projects found they "were related to broader economic gains like increased employment and higher property values".²⁹ Employment levels rose after Complete Streets projects, communities reported increased net new businesses, and eight of ten communities with available data saw property values increase. These projects achieved safety improvements that avoided \$18.1 million in collision and injury costs in one year alone.

5. Public Safety and Emergency Response Implications

Bill 60's forced reliance on vehicle lanes creates public safety risks by exacerbating traffic congestion that delays emergency response. Recent surveys show 49.5% of first responder agencies reported worsened response times in 2024 compared to 2023, with 41.7% citing traffic congestion as the biggest challenge.³⁰

Research documents that traffic congestion adds nearly 10 minutes to emergency response times on average,³¹ and each percentage point increase in congestion results in one second of additional delay.³² Toronto data reveals the severity: the city experienced 1,200 occasions in 2023 when no ambulances were available, up dramatically from just 29 occasions in 2019.³³ Response times exceeding Ontario's

²⁹ Safer Streets, Stronger Economies: Complete Streets Project Outcomes from Across the Country. *Smart Growth America*, February 28, 2015. <https://smartgrowthamerica.org/resources/evaluating-complete-streets-projects-a-guide-for-practitioners/>

³⁰ The growing challenge of traffic congestion on emergency response times. *Smart Cities Dive*, April 20, 2025. <https://www.smartcitiesdive.com/news/archive-acc-the-growing-challenge-of-traffic-congestion-on-emergency-response-times/754760/>

³¹ Emergency medical service providers' experiences with traffic congestion. *PubMed/National Library of Medicine*, February 7, 2013. <https://pubmed.ncbi.nlm.nih.gov/22883716/>

³² Traffic is holding up emergency vehicles. *Possible* (UK organization), February 4, 2024. <https://www.wearepossible.org/latest-news/traffic-is-holding-up-emergency-vehicles>

³³ No ambulances available in Toronto 1200 times last year, auditor finds. *CBC News*, June 27, 2024. <https://www.cbc.ca/news/canada/toronto/ambulance-response-times-toronto-auditor-general-1.7249207>

targets create life-threatening situations, particularly for cardiac arrest patients where the 6-minute response standard aims to enable timely CPR and defibrillation.^{34,35}

Multi-modal street designs that provide transportation alternatives to single-occupancy vehicles can reduce overall traffic volumes, improving emergency vehicle travel times. London's COVID lockdown demonstrated this: reduced traffic caused response times to drop by 41 seconds in Euston, 57 seconds in Tooting, and 1 minute 31 seconds in Soho.³⁶ By forcing municipalities to accommodate all transportation demand through motor vehicle lanes, Bill 60 ensures continued congestion that compromises emergency response.

The addition of bike lanes can improve emergency response times. The bike lanes on University Avenue were specifically designed to be wide enough for ambulances to use when accessing hospitals like Toronto General Hospital and Mount Sinai. Vancouver has intentionally designed bike infrastructure to accommodate emergency vehicles. The Cambie Bridge bike lane is wide enough for ambulances to use, allowing them to bypass traffic congestion when there's a crash.³⁷ Toronto, Vancouver, London UK, Amsterdam, Paris, Dublin, New York, Chicago and Seattle have all designed bike lanes with emergency vehicles in mind: it is a core consideration. Wide, multi-lane roads filled with cars pose greater challenges for emergency responders because drivers aren't always familiar with how to yield to emergency vehicles, and there's often nowhere to move. Additionally, cyclists and pedestrians can move out of the way far more quickly than cars.

Moreover, separated cycling infrastructure improves overall road safety. Toronto studies show a 35% drop in collision rates in areas after installation of fully separated bike infrastructure.³⁸ When streets accommodate multiple transportation modes with appropriate separation, safety improves for all users including drivers.

³⁴ Response times in Ontario. *Government of Ontario*, July 9, 2025.
<http://www.ontario.ca/page/response-times-ontario>

³⁵ Saving a Life in 6.0 Minutes or Less By Utilizing the Closest Resources. *Manitoulin-Sudbury District Services Board EMS*, Various.
<http://www.msdsb.net/images/EMS/reports/saving%20a%20life%20in%206%20minutes%20or%20less.pdf>

³⁶ Traffic is holding up emergency vehicles. Possible (UK organization), February 4, 2024.
<https://www.wearepossible.org/latest-news/traffic-is-holding-up-emergency-vehicles>

³⁷ Heather Drugge, Move on: Stop saying bike lanes block emergency vehicles. *North Shore News* (2025-03-12 <https://www.nsnews.com/opinion/move-on-stop-saying-bike-lanes-block-emergency-vehicles-10365661>)

³⁸ Removing bike lanes will cost at least \$48M: city staff report. *CBC News Toronto*, November 13, 2024.
<https://www.cbc.ca/news/canada/toronto/report-cost-removal-bike-lanes-toronto-1.7382626>

Bill 60's approach prioritizes theoretical vehicle capacity over demonstrated safety outcomes. Local engineers and planners possess data showing where lane reductions for separated bike lanes will calm traffic, reduce collisions, and make streets safer for everyone including drivers and pedestrians.³⁹ The legislation substitutes ministerial political judgment for this evidence-based safety planning.

6. Public Health Benefits and Healthcare Cost Savings

Active transportation infrastructure delivers significant public health benefits that Bill 60's prohibition would prevent municipalities from realizing. Research published by the Public Health Agency of Canada shows that Canadians who engage in active transportation are more likely to meet physical activity recommendations, with accelerometer-measured physical activity higher among active transportation users across all age groups.⁴⁰

The Canadian 24-Hour Movement Guidelines recommend adults achieve 150 minutes of weekly moderate-to-vigorous intensity physical activity (MVPA). Active transportation appears to be additive rather than substitutive: people who walk or cycle for transportation maintain similar levels of recreational physical activity while achieving higher total activity. This has direct health implications: physical activity from active transportation significantly reduces risk of all-cause mortality, cardiovascular disease, and chronic illnesses.^{41, 42}

Transport Canada recognizes these benefits, stating that "designing communities to support active transportation fosters physical activity and produces a variety of public health benefits".⁴³ The Chief Public Health Officer's 2017 Report specifically

³⁹ Ontario Bill 60: A Veto on a Safer, More Bikeable Ottawa. *Bike Ottawa*, October 29, 2025.

<https://bikeottawa.ca/2025/10/30/ontario-bill-60-a-veto-on-a-safer-more-bikeable-ottawa/>

⁴⁰ The contribution of active transportation to population physical activity levels. *Public Health Agency of Canada*, May 20, 2025. <https://www.canada.ca/en/public-health/services/reports-publications/health-promotion-chronic-disease-prevention-canada-research-policy-practice/vol-45-no-5-2025/contribution-active-transportation-population-physical-activity-levels.html>

⁴¹ Road to Health: Improving Walking and Cycling in Toronto. *Toronto Public Health*, April 2012. https://www.toronto.ca/wp-content/uploads/2019/09/9682-Road-to-Health_ImprovingWalking_April2012.pdf

⁴² Active Transportation, Health and Community Design. *Canadian Institute of Planners*, November 2023. <https://www.cip-icu.ca/wp-content/uploads/2023/11/FACTSHEETS-ActiveTransportation-FINALenglish.pdf>

⁴³ Active transportation. *Public Health Agency of Canada*, January 11, 2012 (updated regularly). <https://www.canada.ca/en/public-health/services/being-active/active-transportation.html>

highlighted active transportation as crucial for building communities that support active, healthy lifestyles. Canada's National Active Transportation Strategy, backed by \$400 million over five years, aims to significantly increase the proportion of Canadians who regularly choose active transportation.^{44, 45}

By prohibiting municipalities from installing cycling infrastructure that requires lane reductions, Bill 60 prevents investments in public health that would reduce healthcare system costs. Canadian research emphasizes that "supporting active transportation should be considered an important tool for health promotion" given its contribution to population physical activity levels. The literature showing causal effects of supportive infrastructure on active transportation suggests that "investments in sidewalks and cycling infrastructure, for example, by the transportation or infrastructure sectors, could also be viewed as public health investments".

7. Transportation Choice and Economic Freedom

Bill 60 restricts individual freedom of transportation choice, contradicting conservative principles of personal liberty and market efficiency. By mandating car-dependent infrastructure design regardless of local context, the government effectively forces residents into one transportation mode whether or not it best serves their needs.

Multi-modal transportation systems provide economic efficiency by allowing individuals to select the mode that best fits each trip purpose based on cost, time, comfort, and personal preferences.^{46, 47} TransLink's Transport 2050 strategy for Metro Vancouver articulates this vision: "The person who cycles to visit a friend on Saturday can easily take a shared vehicle to the mountains on Sunday and commute to work via transit on Monday". Each transportation mode has optimal use cases: walking and cycling work best for shorter trips, transit for medium distances, and private vehicles for longer indirect trips or cargo transport.

Freight operations demonstrate this principle of modal complementarity. While road transport dominates due to flexibility, efficient systems offer complementarities

⁴⁴ National Active Transportation Strategy 2021-2026. *Infrastructure Canada*, October 18, 2017 (updated 2021). <https://housing-infrastructure.canada.ca/trans/nats-strat-snta-eng.html>

⁴⁵ Support for Active Transport Policy Initiatives Among Canadian Municipal Decision-Makers. *Active Travel Studies*, November 2, 2023. <https://activetravelstudies.org/article/id/1450/>

⁴⁶ Convenience And Flexibility: Public vs. Private Transportation. *ModeShift*, November 2, 2025. <https://www.modeshift.com/convenience-flexibility-public-vs-private-transportation/>

⁴⁷ Goal One: Convenient Choices for Everyone. *TransLink Transport 2050 (Metro Vancouver)*, 2022. https://www.translink.ca/-/media/translink/documents/plans-and-projects/regional-transportation-strategy/transport-2050/transport-2050_goal_1_convenient_choices.pdf

between modes so each can serve purposes where it performs best.⁴⁸ Similarly, individual travelers benefit from transportation networks that provide genuine choices rather than forcing dependence on a single mode.

Bill 60's prohibition eliminates municipalities' ability to provide this choice by preventing street reconfigurations that would safely accommodate walking, cycling, and transit alongside vehicular traffic. The Institute for Municipal Finance and Governance notes that "municipalities have the power to prioritize complete streets interventions and active transportation investments" as part of their transportation and land-use planning authority.⁴⁹ Bill 60 removes this municipal power, substituting provincial mandates for local flexibility.

Research on transportation equity shows that diverse transportation options particularly benefit lower-income Canadians who may not own vehicles or prefer to avoid automotive expenses.⁵⁰ By prohibiting infrastructure that enables car-free lifestyles, Bill 60 effectively imposes automotive costs on all residents regardless of their economic circumstances or preferences. In Ontario, 4,065,000 Ontario's do not have a driver's license.⁵¹ In the Toronto core, 51% of households have no car.⁵²

Further, it discriminates against citizens who are unable to travel by automobile, including children, adolescents, some seniors, some citizens with disabilities and others.

8. Environmental and Climate Implications

The Environmental Registry posting acknowledges that "traffic and congestion are a major source of air pollution especially in urban areas". However, the proposed solution—prohibiting lane reductions to maximize vehicle capacity—contradicts

⁴⁸ Mode Choice in Freight Transport. *OECD International Transport Forum*, February 2022. https://www.oecd.org/content/dam/oecd/en/publications/reports/2022/02/mode-choice-in-freight-transport_667ea2c1/3e69ebc4-en.pdf

⁴⁹ The Municipal Role in Transportation. *Institute on Municipal Finance & Governance, University of Toronto*, March 24, 2025. <https://imfg.org/report/transportation/>

⁵⁰ Rethinking Urban Mobility: Providing More Affordable and Efficient Transportation. *Institute for Research on Public Policy (IRPP)*, January 25, 2024. <https://irpp.org/research-studies/rethinking-urban-mobility/>

⁵¹ Ontario Driving Statistics for 2024: the Ultimate List. <https://www.g1.ca/driving-statistics/>

⁵² Frank Clayton, Centre for Urban Research and Land Development. Car-Ownning Households up by 355,000 in the GTHA, 88,000 in the City of Toronto, and 26,000 in the Toronto Core since 2006. <https://www.torontomu.ca/centre-urban-research-land-development/blog/blogentry27-car-owning-households-up-in-gtha-city-of-toronto-and-toronto-core/>

established climate policy and will worsen air quality by inducing additional vehicle travel.

Transportation represents one of the most emissions-intensive sectors in Canada.⁵³ Active transportation and transit provide essential tools for reducing transportation emissions. Canada's National Active Transportation Strategy recognizes that "contributing to reducing greenhouse gas emissions" and creating "more inclusive, resilient, and sustainable" communities in the face of "climate change pressures" requires supporting active transportation.

By preventing municipalities from installing cycling infrastructure or transit lanes that require lane reductions, Bill 60 locks in car dependency and the associated emissions. The induced demand effect means that protecting vehicle lane capacity will generate additional driving, increasing rather than decreasing total emissions from the transportation sector.

Environmental Defence identifies Bill 60's broader implications, noting the Highway Traffic Act amendments "would also expand the ban on conversions for '[a]ny other prescribed purpose'".⁵⁴ This language potentially threatens dedicated bus rapid transit lanes, which provide low-emission, high-capacity transportation alternatives. Forcing transit to operate in mixed traffic rather than dedicated lanes reduces service reliability and attractiveness, discouraging modal shift from private vehicles.

Municipal climate actions require transportation policies that reduce single-occupancy vehicle dependence. Complete Streets and active transportation infrastructure represent essential tools for achieving climate targets. Bill 60's prohibition prevents municipalities from implementing the very policies needed to reduce transportation sector emissions.

⁵³ Mischa Young, Georges A. Tanguay, Adriane MacDonald, Ying Zhou, Angelina Giordano. Navigating municipal dynamics: unraveling the political economy of climate policies. *Transport Policy (ScienceDirect)*, September 16, 2025. <https://www.sciencedirect.com/science/article/pii/S0967070X25002082>

⁵⁴ Bill 60 Could Jeopardize Transit Expansion and Lower-Cost Homes in Ontario. *Environmental Defence Canada*, October 22, 2025. <https://environmentaldefence.ca/2025/10/23/bill-60-jeopardizes-transit-and-low-cost-homes-ontario/>

9. Evidence-Based Policy and Government Credibility

Perhaps most troubling, the Ontario government's own internal documents acknowledge that Bill 60's approach may not achieve its stated goals. CBC reporting reveals that "the government is aware the move may not have an impact on congestion and could increase collisions for everyone who uses roads".⁵⁵

Minister Prabmeet Sarkaria has stated the intention is "solely to limit the establishment of bike lanes" and "safeguard lane capacity by preventing the reduction of vehicle lanes". However, this goal conflicts with substantial evidence showing that lane capacity alone does not determine congestion levels, and that diverse transportation infrastructure often improves rather than worsens traffic flow.

Evidence-based policy requires acknowledging when research contradicts preferred approaches. The Broadbent Institute has documented that infrastructure spending generates economic benefits only when it enhances productivity and reduces business costs.⁵⁶ Forcing car-only infrastructure that increases congestion achieves the opposite outcome.

Fiscal conservatism demands rigorous cost-benefit analysis. Smart Growth America's research demonstrates Complete Streets projects "were remarkably affordable, and were an inexpensive way to achieve transportation goals" compared to conventional transportation projects. Bill 60 prevents municipalities from pursuing these cost-effective solutions in favour of mandated approaches the government acknowledges may not work.

10. Regulatory Burden and Approval Process Complexity

Bill 60 adds bureaucratic complexity that contradicts stated goals of "fighting delays" and "building faster." Section 195.4 requires municipalities seeking lane reductions to provide information to the Minister including "any other information that the Minister

⁵⁵ Ontario's bike lane removal plan may not reduce congestion. *CBC News*, March 12, 2025. <https://www.cbc.ca/news/canada/toronto/ontario-bike-lanes-internal-documents-1.7481729>

⁵⁶ The Economic Benefits of Public Infrastructure Spending in Canada. *Broadbent Institute*, 2015. <https://www.iuoelocal793.org/wp-content/uploads/2015/09/Broadbent-Study.pdf>

may require". This undefined requirement creates approval uncertainty incompatible with efficient infrastructure delivery.

Best practices for streamlining development approvals emphasize performance-based standards, risk differentiation, and clear timelines.⁵⁷ Ontario's own efforts to modernize environmental permissions through permit-by-rule frameworks recognize that reducing delays requires clear criteria, not case-by-case ministerial discretion.⁵⁸ Bill 60 moves in the opposite direction by requiring ministerial approval for routine municipal street design decisions.

The Association of Municipalities of Ontario notes this creates additional process layers: municipalities must now prepare submissions, await ministerial review, potentially revise plans based on ministerial feedback, and obtain formal approval before proceeding with local transportation projects.⁵⁹ This delays infrastructure projects while adding staff resource requirements for both municipalities and the Ministry.

Construction delays impose real costs. City of Toronto analysis confirms: "While the economic benefits of these projects will deliver long-term value to the residents and businesses in the city, the impacts of construction are having a direct impact on network capacity and mobility across the city". By adding approval processes that delay project timelines, Bill 60 extends construction periods and associated disruptions.

Conservative principles favour regulatory efficiency and predictability. Bill 60's undefined ministerial discretion provides neither, instead creating a bureaucratic approval process that will delay infrastructure projects municipalities have already designed based on local consultation and evidence. Municipalities are highly responsible in choosing when to change infrastructure, and only do so after consideration of multiple criteria, including traffic movement, impacts on businesses and residents, cost effectiveness, and others. A case in point is widening sidewalks on Yonge Street in Toronto. Planning has been in progress for years, including assessing

⁵⁷ Streamlining the development approvals system in Ontario. *RESCON (Residential Construction Council of Ontario)*, November 27, 2020. <https://cms.rescon.com/media/PDFs/Nov-27,%202020%20%20-%20Streamlining%20the%20development%20approvals%20system%20in%20Ontario.pdf>

⁵⁸ Exploring changes to streamline the permit-by-rule framework. *Environmental Registry of Ontario*, August 30, 2023. <https://ero.ontario.ca/notice/019-69511>

⁵⁹ Bill 60, Fighting Delays, Building Faster Act, 2025. *Association of Municipalities of Ontario (AMO)*, October 27, 2025. <https://www.amo.on.ca/policy/land-use-planning-resources-and-climate-change/bill-60-fighting-delays-building-faster-act>

the impact on local businesses of the proposed change.⁶⁰ Is the Minister going to review all these studies? Or redo them? Or substitute his perception for actual analysis?

Conclusion and Recommendations

I recommend:

1. **Delete Schedule 5, Section 195.3 entirely.** Municipalities should retain authority over local street design decisions where they possess superior knowledge of local conditions and are directly accountable to affected residents.
2. **If the Province proceeds with this provision,** narrow its application significantly:
 - Exempt arterial roads where municipalities have conducted traffic studies demonstrating minimal impact on vehicle flow
 - Exempt streets where lane reductions serve multiple purposes including loading zones, transit priority, or pedestrian safety
 - Establish clear, objective approval criteria rather than undefined ministerial discretion
 - Require provincial decisions within 30 days to prevent indefinite delays.
3. **Respect the principle of subsidiarity** by recognizing that transportation decisions affecting local streets should be made by elected municipal councils accountable to local residents, not by provincial Ministers removed from daily impacts.
4. **Acknowledge economic evidence** showing that lane capacity expansions generate induced demand rather than solving congestion, that reducing lane capacity often results in traffic evaporation, and that multi-modal streets support economic vitality better than car-only corridors.
5. **Enable fiscal sustainability** by permitting municipalities to make infrastructure choices that maximize return on investment and reduce long-term maintenance burdens.

Ontario's congestion challenge requires evidence-based solutions grounded in sound economics and respect for local democracy. Bill 60's approach achieves neither, instead imposing provincial mandates that will waste taxpayer dollars, worsen

⁶⁰ Libaan Osman, Walking on Yonge Street shouldn't feel like a contact sport—so why the delays to widen the sidewalks? *The Toronto Star* 2025-11-17 https://www.thestar.com/news/gta/walking-on-yonge-street-shouldn-t-feel-like-a-contact-sport-so-why-the-delays/article_c713cd86-244a-4fb9-9053-60259ef43e40.html

congestion, and prevent municipalities from implementing transportation solutions that serve their communities effectively. Bill 60's prohibition on reducing vehicle lanes to install bicycle lanes or other prescribed infrastructure contradicts multiple core conservative principles: fiscal responsibility, municipal autonomy, evidence-based policy, economic efficiency, and individual freedom. The legislation would prevent municipalities from making cost-effective transportation investments, ignore established economic principles regarding induced demand, centralize decisions that properly belong at the local level, and limit transportation choice for residents and businesses.