

**From:** Brendon Samuels  
**Sent:** Friday, January 5, 2024 2:42 PM  
**To:** PEC <pec@london.ca>  
**Subject:** [EXTERNAL] Submission for PEC January 9 public agenda

January 8, 2024

Planning and Environment Committee  
City of London  
300 Dufferin Avenue  
London, Ontario  
[pec@london.ca](mailto:pec@london.ca)

RE: Green Development Standards

Dear Councillors,

I am writing to express strong support for the creation of green development standards for the City of London and the immediate adoption of priority green development criteria that are ready to be implemented now, such as bird safe building design standard compliance for municipal facilities, electric vehicle infrastructure in buildings with more than 40 units, encouraging native species in landscaping, and short-term bicycle parking for townhouse developments.

London is lagging behind other comparably-sized municipalities in Ontario that have already been enforcing green development standards for years. As the City grows and behaviours change, many of the new developments being approved are not incorporating practices consistent with Climate Emergency Action Plan targets for reducing greenhouse gas emissions. Extreme weather is becoming more frequent and the cost of operating buildings is increasing, which means what is being constructed today using outdated materials is likely to require retrofitting in the future. This will ultimately pose additional financial strain on building owners and taxpayers. It is much more economical for the City to factor sustainability into the initial designs.

In some ways, this reminds me of the combined sewer system that the City is incurring great expense to replace: decisions were made in the past that did not adequately consider externalized costs (e.g., pollution of the river) and long-term infrastructure needs. Now and into the future, the City has a responsibility to plan differently. We have solutions for most of the challenges that growth poses to meeting emission reduction targets. The City can build better and smarter, anticipating the needs of Londoners in the future. Small, inexpensive changes to how buildings and landscaping are designed can make an enormous cumulative difference for the biodiversity services (e.g., pest control, seed dispersal, pollination) we need to adapt to combat climate change and make our City liveable for all. However, these solutions will only be implemented correctly and consistently if they are enforced through standards.

**Please prioritize bird safe design**

I am a researcher who studies the problem of birds crashing into windows on buildings in London. I also coordinate London's participation in the Bird Friendly City program, which Council proclaimed support

for last August, recognizing that a core requirement of the program is that leading threats to birds are addressed in policy. Bird safe building design is a major gap.

I have been advocating for the City to adopt a bird safe building design standard for 6 years, through multiple terms of advisory committees, participation in a technical working group hosted by Development Services, and three annual reports received by the Planning and Environment Committee. During this period, I have watched as more and more building construction has neglected to include bird safety measures. I am regularly contacted by Londoners who are concerned about finding birds being killed by collisions with windows on such buildings. I would very much like to tell residents this is something their municipal government is working on improving.

Bird safe design is increasingly requested in public consultations about planning applications at the Planning and Environment Committee. Although the City has recommended such measures in approving certain developments, it does not presently have a ratified definition of what is considered safe for birds. Therefore, developers do not have necessary clarity to understand what exactly is required to achieve compliance with an approved site plan. In practice, this may introduce risk of buildings adopting false solutions to prevent bird collisions that are ultimately not effective, such as applying a handful of stickers or treating just a couple of windows on a large structure. By adopting the CSA A460 Bird Friendly Building Design standard, the City would be aligning future references to bird friendly design with current best practices used in other jurisdictions. CSA A460 provides detailed specifications that are straightforward for architects to understand and implement.

I want to also clarify that in fact, the actual cost of designing buildings to be safe for birds is nominal, typically representing a tiny fraction of 1 percent of the cost of a building's construction. I have shared detailed cost specifications and information provided by architects with City staff. From successful implementation of bird safe design requirements through site plan control in other municipalities, we know that this does not pose any risk of delaying development approvals, and it does not increase the cost of housing units or create a burden for taxpayers. In general, bird safe design involves making minor changes to the types of glazing used for windows up to the fourth storey of a building. According to authorities ([source](#)) this is important for *all* buildings subject to site plan control, not just tall buildings. Notably, the London Plan City Building Policies section 304 includes misinformation about this important point.

At minimum, the City should be incorporating bird safe design into its own facilities. I have personally recovered many birds injured and killed by collisions with windows on municipal buildings. These ongoing environmental impacts can be mitigated by adopting the CSA A460 standard for public building construction, and incorporating bird safety into building retrofits wherever possible.

Brendon Samuels

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