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**Sent:** Wednesday, June 19, 2024 6:59 AM

**To:** Council Agenda <councilagenda@london.ca>

**Subject:** [EXTERNAL] addition to the agenda of the June 25 council meeting

Please add the following letter to the agenda of the upcoming meeting  
You have my permission to publish the letter as part to the public record

It relates to the Report of Planning and Environment Committee and to the item referring to "323 Oxford St. West, 92 and 825 Proudfoot Lane"

Thank You

### 323 Oxford St West, 92 and 825 Proudfoot Lane

Understanding why you must stop this proposal and work to have it changed comes down to seeing two serious problems with this development in its present form. First, if it is completed as is, it will cause significant permanent damage and impairment to the functioning of London's urban forest canopy. Second, over the course of its completion we calculate that it will be the 'home' for 6046 more cars which will significantly increase the GHG emissions in this community and in any areas of the city through which they travel on daily commutes. This project in combination with other projects in the areas has the potential to create an immense, degraded, high emission community here.

First, this 78.63 acre area is comprised of agricultural areas, a former driving range and two patches of forest canopy. In the plans for this project these two canopy areas totalling about twenty acres are eliminated. To emphasize, two significant pieces of the urban canopy patchwork will simply be obliterated.

As you know, our canopy is a patchwork of areas of trees separated by areas of mainly pavement and buildings, sometimes called 'heat islands'. The denser the patchwork, the greater the cooling effect. This development will effectively transform the whole area from a contributor to the cooling effect into a 79 acre heat island and will significantly diminish the overall cooling effect of the canopy.

Already, too many heat islands, spread across the landscape of the city, reduce that cooling. Speculation is that London's current canopy is around 27%. And the science shows that the canopy needs to approach 40% in order to effectively cool the city as a whole. Increasing the canopy to the current goal of 34 % will be challenging enough without the removal of 'patches' like these.

This is the big picture of the role of the urban forest but trees are of course effective in cooling and cleaning the air 'locally'. And this plan eliminates a valuable resource that could be used to improve and cool the air in the development itself. As many trees as possible should be spared to shade the ground and buildings in developments, whatever the buildings might look like.

Two comments by one PEC member who essentially disagreed with our objection to this proposal are worth consideration.

The member argued that it was essentially ok for this to become an intensified high GHG emission area because its development would prevent farmland from being developed in rural areas outside the urban core. The traditional argument for intensification over 'rural' sprawl is usually based on the reduction of sprawl traffic. Roughly, people will commute less, walk, bike, etc. more if they live in an 'intensified' area than if they live farther from the core. The further complaint about commuters from Thorndale (a community mentioned twice) is that they commute to London where they work, take advantage of services in the city and yet pay no taxes, hence further reason to discourage development in the farmlands around villain Thorndale.

I think in order to justify this kind of urban greenspace sacrifice you would need to show that in this development there would actually be less commuting and that commuting from ex urban communities really was a problem, say greater in amount from commuting out of the city to the 'rural' areas.

An examination of actual traffic patterns in and out of the city sheds light on this. The 2021 London census shows that most workers who drive to work, drive within the city (131 500) but a significant number do drive to work to areas outside the city (21 540) (14%). Only 7 % of Londoners take transit to work, never mind walking so the great majority of workers in this community are going to be commuting to work within and some out of the city. Some will probably even commute to Thorndale!

What we would like to compare is that (21 540) number to the number of workers who commute into London from the surrounding communities, that being the practice that this development is supposed to help prevent.

The problem is that census information about commute patterns isn't available for smaller communities, like say, Thorndale. The 'smallest' ex urban community, near

London with information available is St. Thomas. Its commute information is revealing. The proportion of workers commuting within the St. Thomas area to those commuting to 'outside' communities is 8670 to 4600. Indeed a higher percentage of workers from this community drive to other communities to work than in London and very likely a high percentage of those are driving to work in London, but still only a fraction of 21540 (21%). It would be nice to know how many of the 21540 ex urban London commuters are driving to work in St. Thomas, essentially crossing paths with St. Thomas drivers heading to London.

It would also be nice to know whether the total of commuters to London from all of the communities even smaller than St. Thomas is greater or less than this 21540 number. But until such time as there is information available about smaller communities, there's really no way of knowing.

But, clearly, there isn't at this point much evidence to show that ex-urban commute in traffic is a big problem (that this development would prevent?). The real issue is the traffic, and emissions, created by this development from commuting, which will be within and out of, the city itself ( around 86%).

The second 'argument' essentially dismissed concerns about increasing GHG emissions raising the issue of this development taking a long time to complete. Indeed the time frame for completion would be in the neighbourhood of twenty-five to thirty years. As if to suggest that worrying about the distant future was pointless.

While, the other concern about sprawl in small communities have merit, this line of thought trends to the bizarre.

Of course, over a longish period of time, as each of the phase of the development is completed, it will create more commute traffic, and each one over time will add to the emissions count and as this project is completed in stages, over the next twenty-five or thirty years, the amount of GHG emissions increases. But if the idea of having a zero emissions target by 2050, has any meaning at all, it would suggest that we should be looking for strategies to take us in the opposite direction, aiming at emission reduction rather than increase.

A comment by another PEC member apparently in support of this development seemed to be a recollection of happy times when (he) apparently lived in Cherryhill, the existing development built by the same developer which will be a 'neighbour'

to this one. However, It was not clear, at least to us, how this related to the merits or drawbacks of building this development.

The two problems with this development, canopy vs. emissions, although both are important, they are not equally easy to solve. To prevent degradation of the canopy, the developer will just have to change these plans so that this looks more like a sustainable community. In other words, provide needed housing but do it in the context of a more sustainable environment.

But the issue of increasing GHG emissions is part of a much larger and more difficult problem. We referred to it when we complained earlier about a development at 534 Oxford. At that time, the number we researched for the 'new' cars baked in to approved future developments was 38 234. Adding the 7000 or so cars from the Oxford developments the total increases to 45 234, a 16.6 % increase over London's current car population (273000) and potentially a 16.6% increase in GHG emissions.

We actually asked one PEC member who pleaded for the need for 40 000 homes what plans were in place for the emissions from 'those cars' because that could mean 100 000 people give or take, spawning 66 000 more cars, causing a 20% increase in GHG car emissions over current levels.

As to solving this problem? We can't just keep injecting more cars into communities where there are too many cars already, whether the concern is congestion, emissions or both. Which means we either stop building there or build places where 'no cars are allowed'. And cities do have a responsibility we think to build in places where there is a way for people to get to work. So maybe this becomes a matter of creating effective transit or a point where growth just needs to stop.

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