

DRAFT CITYWIDE URBAN DESIGN MANUAL

FEEDBACK FROM THE TREES & FORESTS ADVISORY COMMITTEE

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While TFAC is generally supportive of the proposed Urban Design Manual, we would offer the following comments:

General Comments:

- 1) The Urban Design Guidelines should make it clear that they are intended to be supportive of the City's recently adopted **Urban Forest Strategy**, and designed to help achieve its goals, particularly with regards to **canopy cover** – that the City is seeking to dramatically increase canopy cover over the coming decades, and that much of that increase will need to occur on private lands.

Much of the language in the guidelines is focused on “landscaping” very generally, and does not do much to emphasize the need for trees (and large trees) specifically. This downplays the urban forestry aspect of the Guidelines.

- 2) The overall tone of the document does not appear very “green”. For example, **the introduction section does not mention sustainability or the environment at all**: only “alternative” which some might see as casting it in a negative light. Similarly, the “purpose” section makes absolutely no reference to the environment, natural or built (p. i). The Policy context (p. ii) references the importance of the Official Plan, but makes no reference to the “green” directions of said plan. (If the OP did not provide a sufficient policy background to make points related to sustainability, we would suggest that the PPS could be drawn upon).

As another example, P.29 states that “Walkable environments tie a community together on a *visual, physical and social level*, enhancing the image of the community while promoting healthy lifestyles” (emphasis added) – again, the environment and climate change are not even mentioned (which, within the context of walkability, is especially surprising).

Urban design has an important role to play in sustainability, and if the City wants to achieve **“(Direction #4) Become one of the greenest cities in Canada”** (from the draft London Plan), as a bare minimum, it needs to be giving clear and explicit consideration to the environment in its policies and related guidelines.

- 3) There was some concern expressed about the possibility for **“exceptions” or exemptions** to the Urban Design guidelines: while we understand the need for exceptions in some cases, it is hoped that this will prove to be the exception, not the rule (particularly with regard to those items which help to make the city more sustainable).

Specific Comments:

- 1) “Public Realm” (p. iii) should also recognize that **natural features and areas** can play a part of the “public realm” in a neighbourhood, and that there is value in maintaining them. (This idea comes up on p. vi, but it would be good to integrate throughout).
- 2) There’s an inconsistency in sectioning between the table of contents for “Site Character & Context” on vi. which ends with “F. Heritage” while the list on p. 1 ends with “G. Trees”. (Then “G. Trees” is missing from p. 3). We would recommend having a “Trees” section in site character and context (as presumably was originally the case), and using this as an opportunity to how the use of trees is particularly important for developments in the “Forest City”. It also seems odd that the only “Trees” section is “Street Trees”, which are already regulated by the City anyways. (Is the point here not to provide guidance for the private land component of the development, i.e., for the *non*-street trees?)
- 3) For “C. Grading.1” (p.2), we would suggest that there may be instances where retaining walls are appropriate if they allow the preservation of mature trees and would like to see that scenario mentioned here.
- 4) We have some concerns over A.Site Features.3 - “preserve, create and enhance access to water courses and bodies, while providing a public interface”. New access points to water bodies can be environmentally destructive (as they typically involve removing swaths of trees and other vegetation), and so we would recommend the adding “in such a way that minimizes any impact on the natural environment and waterways. Not all sites may be appropriate for such an access point.”
- 5) A.5 talks about providing “physical access” to natural features. It is important that the Design Guidelines recognize that **not all natural features are suitable for physical access** – for example, some ESAs contain sensitive habitat for Species at Risk and encouraging more human foot traffic through any time there is more development in the area undermines the point of declaring an area an ESA in the first place! There is a trend in some ESAs now towards trail closing specifically for the purpose of reducing such impacts: the guidelines should reflect this understanding.
- 6) For E.Existing vegetation.2 (p3) “Existing vegetation should be retained along water courses, trail corridors, and adjacent to open spaces.” We would suggest adding a point to say that existing vegetation along watercourses should be **enhanced** wherever possible, with a goal of a minimum 30 m buffer. As per Environment Canada (2013) - “How Much Habitat is Enough”, 3rd Edition:

“Both sides of streams should have a minimum 30-metre-wide naturally vegetated riparian area to provide and protect aquatic habitat. The provision of highly functional wildlife habitat may require total vegetated riparian widths greater than 30 metres.”

- 7) E.ExistingVegetation.3 (p3): Who will decide what constitutes a “significant” tree?
- 8) For F.Heritage Areas (p3), we would recommend that any new developments in a heritage area which has traditionally used harmful invasive species in its landscaping, the closest native lookalike be substituted, so that in the long run, the area can transition to ecologically beneficial species.
- 9) If there are any opportunities for developments to request a special exemption to allow them to construct less than the minimum number of parking spaces (D.Parking.1) to free up space for more trees or higher residential densities where circumstances warrant, it may be worth communicating that explicitly in the Urban Design Guidelines. Many communities in Ontario are looking at parking space reduction as a way of helping achieve environmental, transportation, and health goals.
- 10) Landscaping for surface parking (under section D.Parking on p.8) should actually reference “trees” for the purposes of reducing the **heat island effect**: trees do substantially more in this regard than grass. The heat island effect is going to be of more and more concern as climate change (and the number of extreme heat days in London) progresses.
- 11) G. Residential Amenity Areas (p.11) should be required to integrate trees whenever possible so as to ensure areas of children’s play (or for sitting or walking) have access to shade, with it being noted that **medium or tall tree species** are needed to provide useful shade (ornamentals are simply too small to be of much use).

Similarly, wherever walkways are mentioned in the document (for example, F.Landscaped Open Space.4 on p.10), it should be specified that landscaping should use trees to provide shade for pedestrians: the word “landscaping” alone is insufficient. Section I. (“Waiting Areas”) on p. 50 should also include a requirement for shade, whether provided by trees or other means.

An explicit goal of seeing all walkways being shaded (preferably by trees, although hardscaping could also be an option) would be beneficial.
- 12) In J. Stormwater Management Facilities: we would like to see a point specifically recognizing the potential for SWMs to serve as valuable habitat which **should** be naturalized wherever possible, as opposed to merely something for consideration. (The current wording in J.4 is seen as being insufficient) (p. 12).

- 13) M.Utilities.7: “Utilities should be grouped where possible” – we would suggest adding “to create the maximum possible space for trees or other features” (p. 14) to make it clear that there is something actually lost if a design fails to do so.
- 14) Could taller trees (or more trees) be required when “Tall buildings” are being planned? (p. 18)
- 15) We strongly support A.Connectivity.8 (p. 30):” Tree planting should be provided in landscape strips adjacent to walkways to ensure a barrier between pedestrians and vehicular traffic.”, but again stress the need to state that trees should be large or medium species wherever possible.
- 16) The “What we are trying to achieve” section for the Public Realm (p.45) should have a point that speaks to **expanding and enhancing the urban forest.**

“Street Trees” section:

- 17) B.Street Trees (p. 46) There needs to be a point that explicitly emphasize that the **largest species possible for a space should be used**, in keeping with the Council-adopted canopy targets in the Urban Forest Strategy.
- 18) We would strongly recommend that B.Street Trees.7 on p.47 (“tree species that are well adapted to harsh urban conditions should be used”) should be revised to read “**Non-invasive tree species that are well adapted to urban conditions should be used, with an emphasis on native species wherever possible.**” The continued lack of consideration for issues around invasive species is a substantial short-coming in several policy documents and a growing concern for some members of TFAC.
- 19) Tree guards should be used in *any* area where mowing or whipper-snipping may occur in order to protect the trunks. Tree guards do little to prevent cyclists from attaching their bikes or related damage: the need for guards is unrelated to traffic volume. (B.Street Trees.9 on p. 47)
- 20) **The proposed 1.5 m setback from curb (B. Street Trees.10 on p. 47) is inconsistent with the City’s own street tree guidelines** allow tree plantings on boulevards which are only 1.5 – 2.0 m wide (see: <http://www.london.ca/business/Resources/Consultant-Resources/Documents/Specs%20and%20Reqs%202015/12-DSRM-2015-TreePlanting.pdf> p. 12-10), which means that the distance from curb for street trees can be as low as 0.75 m. It would be very unfortunate if a new development failed to install trees because of this inconsistency: we would recommend that any recommendations concern street trees in the Urban Design Guidelines be consistent with the City’s pre-existing Tree Planting Guidelines.

For any actual street trees in a development, it would be good to explicitly reference the Tree Planting Guidelines, as they may be updated more frequently than the Urban Design Guidelines.

- 21) B.Street Trees.11 (p.47) “Trees should be spaced approximately 10 m apart, **or closer for shorter species, as appropriate**” would be better wording: 10 m is the maximum distance apart we’d like to see trees, as, again, the City has a goal of maximizing canopy coverage. This revised wording more strongly reflects the need to plant more closely if ornamentals are used.

(See also the City’s Street Tree Planting Guidelines, which state: *“Adjacently planted trees will be shown approximately every 3.0m –12.0m o.c. where practical and where growing space is available, according to species. Ornamental trees will be spaced more closely than medium trees, and medium trees more closely than large trees.”*)

- 22) We strongly support G.2 on p. 49 (“plants that are native species to London should be used when possible”, and would recommend adding: **“invasive species should be avoided**, especially where the site is in proximity to a woodland or other natural area”).

- 23) We support the use of high canopy trees along streetscape adjacent to parks (K.Park Design.”6”, though probably meant to be K. “1” on p. 51)

Questions for Staff:

- 1) Could the Urban Design Guidelines include guidance on minimum canopy cover for new developments?
- 2) The section on parking seems to suggest that 'Smart Centres' are a thing of the past for London. Is this impression correct?
- 3) “F. Landscaped Open Space.8” (p. 10) says to “Minimize grading and the removal of non-permeable surfaces surrounding existing vegetation and mature trees” – the wording here sounds strange. Is this intended to minimize the removal of non-permeable surfaces (e.g., asphalt) around trees? Generally speaking, reducing non-permeable surfaces around trees is a good thing. Did you mean permeable? We would recommend the use of permeable surfaces wherever possible: it may be helpful for the Urban Design manual to help provide proponents of new developments some direction in this regard.