

Advisory Committee on the Environment (ACE) comments on The London Plan

ACE comments are a result of Planning staff's presentation July 16, 2014 asking ACE to give additional input to The London Plan by November 3, 2014. ACE commends the City for the readability level of the plan and its innovation.

LOCAL IMPROVEMENT CHARGES

*In the Our Strategy chapter, p21, **Direction 4**, ACE fully supports and encourages the high standard goal to have London as one of the Greenest cities in Canada by 2035. **Not included under policy 48 likely as no action required. Planning advised different staff made entries to the database.***

ACE agrees and supports p191/192, policies 792, 795, 803, 805 and 810 in the **Green City Strategy** section. These policies highly correspond to the introduction of Local Improvement Charges (LIC) for clean energy, energy efficiency and retrofit improvements in new and existing homes employing the **PACE** (Property Assessed Clean Energy) and **PAPER** (Property Assessed Payments for Energy Retrofits) programs.

The above points in **The Green City** section of the London Plan refer to:

- improvements in green job creation
- the role the City plays in growth in the green economy
- incentives to encourage green businesses
- incentives to support sustainable forms of development
- financial tools incenting improvements to environmental performance of existing building through retrofits
- a Community Action Plan which would implement more environmental friendly and affordable energy usage.

These goals are consistent with the PACE and PAPER programs, the key words being 'incentive'; offering opportunities that would not be available otherwise, and 'affordability'; offering residents a chance to invest in environmental home improvements they would not be able to afford otherwise.

Recommendation:

ACE advises that The London Plan include: specific wording that refers to the PACE and PAPER programs in the body of the plan. (Such wording can be amended to particular points that refer specifically to city sponsored incentives that encourage home energy efficiency improvements.) **No change - addressed in policies 805 & 808. LICs are one possible tool**

1. Under Green Development

Example with p191, policy 805

"Financial tools will be explored to consider incenting improvements to the environmental performance of existing buildings through retrofits."

Such financial tools could make use of Local Improvement Charge (LIC) incentives to assist property owners to improve home energy efficiency and clean energy retrofits. (The bold type being the amendment) **Modified - revised to address comment**

2.Under Green Energy and Clean Air

Example with p192, 810 *Community Energy Action Plan*

“...overall strategy to implement more environmentally friendly and affordable energy usage and enhance local air quality.implement such things as energy conservation, energy efficiency and good design, passive solar, waste heat utilization.....”

The overall plan could enhance affordability to building owners by offering LIC incentives to implement energy efficiency and clean energy retrofit programs. (The bold type being the amendment) **No change - addressed in changes to policy 805**

ACTIVE TRANSPORTATION

Barriers to more citizens using active transportation include the lack of safe, convenient facilities recognizing increases in growth and population place stress on existing transportation systems. For vehicle drivers, traffic problems can increase travel time with traffic delays, vehicle operation costs and most importantly, impact air pollution recognizing vehicles are a large source of smog-forming emissions within the London area.

ACE recognizes greater mobility choices can help to reduce pollution and make it easier to walk, cycle or take the bus locally. Accommodating active transportation has also been shown to increase property values and enhance public health.

Recommendations:

Public transit carries approximately 12% of Londoners and active transportation (walking and cycling) represents a further 9% at this time. The potential is there for more. ACE recommends an emphasis on improvements such as segregated bike lanes to make trips more enjoyable and safer and a Complete Streets policy design approach to slow down traffic and improve our air. These approaches are not prominently referenced in The London Plan. **No change - complete streets policy to be completed in near future.**

ACE asks that a Complete Streets policy be put into place in the near future.

No change - complete streets project to be completed in near future

ACE cannot overly emphasize the value of a coordinated approach to street design standards to support pedestrian, cycling and transit priorities within neighbourhoods as highlighted on p57, policy 144_8 and p67, policy 172 which emphasizes mobility options. **No change - indicates support for the Plan.**

Integrate these mobility actions throughout the document. For example, in the Our City chapter, page 5, policy 11 – add data on cycling and pedestrian use, not just transit data. **Modified - revised mobility policies to reflect comment**

Reference mobility options in the same order throughout The London Plan. Change p68, policy 177_3, p70, policy 192 and p352, policy 1293 which have a different order. Use the order of pedestrian, cycling and transit to emphasize walkability and to align with numerous other references in the document. Reword p35, policy 69 on the city's street network mobility corridors to emphasize pedestrians first also recognizing the importance of flow of goods and services. **No change - order does not indicate priority.**

Add transportation choices increase road safety by reducing traffic congestion in Our Strategy chapter, p23, **Direction 6**. Add to **Direction 7** the potential of increased retail sales in pedestrian friendly areas and cycling destinations. **No change - already integrated into strategic directions**

Amend the City's Structure Plan chapter, p 30 policy 60 to include the city's cycling route network under networks that shape how London operates – see page 81 map 2 mobility network. **No change - Map 2 the Mobility Network map serves this purpose**

ACE supports that pollution is referenced in the Growth Management chapter p45, policy 101 and that the city p192, policy 814 plans to establish a full fleet of city cars and efficient medium and heavy duty vehicles to reduce the city's carbon footprint and p220, policy 867 is not permitting drive-throughs in the design of proposed rapid transit corridors. Rapid transit and urban corridors p215, policy 856/7 envision walkable streetscapes and intensification corridors involving more pedestrians, thus, the importance of air quality in these areas. **No change - indicates support for the Plan**

Add on p47, growth policy 102 that the city looks to achieve infrastructure that recognizes population increases to London include many young professionals who do not own vehicles and want pedestrian friendly communities. **No change - Policy 9 under Our City includes a reference that the Millennial demographic is known for being less automobile focused**

P357, policy 1300 states that Official Plan policies are designed to protect public health and safety. Safe cycling though is referenced minimally in this document. Observed examples include p24, **Direction 7_6** safe cycling infrastructure, p41, policy 91 safe on-street cycling routes, p57, policy 144 traffic calming, p70, policy 192 grade separations safe for cycling and pedestrian movement, p147, policy 521 public facility design layout for pedestrian and cycling safety, p231 policy 898_6 wide sidewalks for safer access through parking lots, p239 policy 917 site layout, building location, and design reinforcing comfort and safety. There should be more reference to safe pedestrian and bicycle oriented streetscapes visible in

The London Plan, particularly on cycling. **No change - statement of authority for producing the Plan**

ACE supports the city's Building Policies chapter incorporating walking and biking under categories of what 'we are trying to achieve' and language such as found on p51, policy 131 regarding secondary plans that make reference to placemaking, multi-modal transportation network, and active transportation. **No change - indicates support for the plan**

P83 policy 243, add cycling parking to other transportation infrastructures. **No change - can be considered "other related infrastructure"**

P137 policy 487 references running which should be incorporated into other sections of the document assuming running is not purely for recreation or leisure. **No change - reference to running intended to convey an activity/idea**

The City Design chapter, p53 policy 140 notes young professionals seek walkable communities. Add London recognizes the need to attract and retain this talent through demographic effectiveness assessment of their needs. **No change - addressed under Our City**

P72 figure 1 street design zones – add bike lanes to graphic to align with p71 policy 200 that references pedestrians, cyclist and transit in figure 1. **Modified - bicycles shown in the vehicle zone section**

P79, policy 207 under the Mobility chapter, add the city's transportation mode share targets, noting telecommuting is a viable option to reduce traffic congestion. This is not referenced in The London Plan. **No change - policies achieve intent of plan**

P79 policies 208 and 209 add bicycle parking as an option to park and ride facilities for transit. **No change - issue addressed in policy 214**

P80 policy 211 shows active transportation as walking and biking, whereas, p55 policy 144 lists active transportation as cycling, walking, blading, boarding, and transit (the only reference in the document). **No change - walking and cycling is a "key focus", not exclusive**

ACE strongly supports p80 policy 218 that all street reconstruction/widening include cycling lanes. **No change - indicates support for the plan**

P138 policy 491 specific to parks and recreation, add cycling routes to content. **Modified - revised to address comment**

P200, policy 835_5, include bicycle parking, carshare, bikeshare under public parking plan for downtown. **Modified - revised to address comment**

P223, policy 871 note neighborhood is spelled differently to other references throughout the document. **Modified - revised to address comment**

Under the Neighbourhoods chapter, p242, policy 924_7, add cycling mobility as well as pedestrian mobility in reference to street network design. **Modified - revised to address comment**

POLLINATORS

ACE has recently tabled a number of policies to support and enhance the challenges that pollinators face in our urban and agricultural-dominated landscapes. This includes: habitat loss, loss of food sources, disease and pesticides, with many of these factors acting in concert. The City of London has been very supportive of pollinators but more can be done

Recommendation 1: Identify London as a Pollinator Sanctuary in the City's Official Plan. **Modified - added policy to 48_4 to "establish London as a key pollinator centre..."**

Add to: **"Direction #4 - Become one of the greenest cities in Canada"** - a part 15: London will become a Pollinator Sanctuary by recognizing the role that critical role pollinator habitat plays in supporting ecosystem functions, the city will take all opportunities to protect, maintain and enhance pollinator habitat within City parks, Restoration Areas and Ecological Linkages, lands adjacent to stormwater management facilities and open space areas. **Modified - added policy to 48_4 to "establish London as a key pollinator centre..."**

Recommendation 2: Include explicit language throughout the London Plan that reference the importance of creating suitable habitat for pollinators on private and public lands as well as reducing pesticide pressures. **Modified - added reference for pollinators to Green and Healthy City, Urban Forest, and Parks and Recreation chapters**

P35, policy 67_4: add Protect, enhance and restore **Modified - revised to address comment**

P57, policy 144 Street Trees and Landscaping. Add trees that offer ideal habitat for pollinators will be planted wherever possible, also city street landscaping will encourage the planting of short and tall grass prairie grasses and other native flowers, shrubs and trees that offer habitat for pollinators. **Modified - revised to address comment**

P95 need to add to policies 312 and 313 re pollinator habitat **Modified - revised to address comment**

P99 Management, Restoration and Rehabilitation Priorities: Identify the creation of pollinator habitat as top priority **No change - issue is covered in identifying the protection and restoration of wildlife habitat, river stream, and ravine corridors; and naturalization areas**

P157 Stormwater drainage and stormwater management: Add section on creation of pollinator habitat around each old and new stormwater management facility. **No change - addressed under Green and Healthy City and Forest City**

Mention of Pollinators can also be placed within other sections of the London Plan, such as in Urban Forest, Parks and Recreation, The Food System, and Urban Regeneration. **Modified - added reference for pollinators to Green and Healthy City, Urban Forest, and Parks and Recreation chapters**

Recommendation 3: Create a Natural Heritage Master Plan which should have an extensive section not just on protecting but also on restoring and creating pollinator habitat.

A fully explicit consideration of ecosystem services from pollination to food production to flood mitigation is needed for London. This would integrate our traditional Natural Heritage Planning with Urban Forestry, Stormwater Engineering, Parklands planning under one umbrella: the umbrella of ecosystem services. **No change - policies 1301-1308 result of OPA 438 to the Official Plan and are proposed to remain in The London Plan**

(Gabor - please see p92 staff responses to ACE recommendations for the London Plan. Your input was merged with another comment to read as follows Policy 321: Suggest changing title from "Infrastructure" to "Infrastructure and Green Infrastructure". Also suggest that city needs a Natural Heritage Master Plan.

I just spoke to Heather and she asks that you review policy 661 and 321 as the City proposes an integrated and co-ordinated policy. If more needed, please explain)