

Friends of Urban Agriculture London

March 31, 2022

Re: City of London Climate Emergency Action Plan

Strategic Priorities and Policy Committee:

Friends of Urban Agriculture London (FUAL) would like to thank all the individuals, organizations and agencies that collaborated to produce London's draft Climate Emergency Action Plan. Without a plan to mitigate the effects of climate change; our health, welfare and food security will suffer negative effects.

Plans and strategies to eliminate organics from the waste stream will help to eliminate a concentrated source of one of the most volatile greenhouse gasses, methane. Instead, turning these organics into resources through composting, the use of technologies, and the circular economy, will create jobs and reduce odours around landfills.

Food production and distribution is a very important part of any Emergency Action Plan. We are pleased to see that increasing resources for Food Production and Distribution is recognized as an action that can be undertaken, now, through the Urban Agriculture Strategy, "to help Londoners grow their own food through community gardens or at-home gardening programs."¹ To provide locally grown food for a culturally diverse, densely populated and rapidly growing City such as London; all resources and opportunities must be employed.

The omission of the Extreme Climate Mitigation effects and growing potential of Green-roofs and Green-walls is a notably missing component in this Climate Emergency Action Plan. The heat island effect created by the dark asphalt and grey concrete infrastructure of cities cause serious illness and negative health effects for many city residents ranging from heat rash and cramps to cardiovascular diseases, respiratory diseases, and may lead to stroke². Green-roofs and Green-walls have a recognized benefit in reducing the heat island effect of cities. Green-roofs provide an insulating effect to cool buildings in the summer and contain heat in the winter that reduce energy usage, clean urban air, enhance stormwater management, increase biodiversity³ and improve quality of life.⁴ When designed and built properly, green-roofs are potential urban gardens or urban farms compatible with solar PV systems, that will allow more residents grow food close to home, provide locally sourced food for institutions and create jobs to feed more people. Green-walls can add another benefit by breaking down the wind tunnel effect



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created amongst tall buildings.⁵ Implementing Green infrastructure such as Green-walls and Green-roofs provides an environmental benefit⁶ to the whole city.

Friends of Urban Agriculture London urges the Strategic Priorities and Policy Committee to recognize the beneficial use of green-roofs and green-walls in urban infrastructure and prioritize its specific inclusion in the Climate Emergency Action Plan. We further urge the committees and City Council to implement a Green-roof bylaw. “The Planning Act provides for municipalities to mandate sustainable urban design through site plan approvals.”⁷ “Municipalities cannot rely solely on Ontario’s Building Codes minimum requirements in order to achieve their environmental goals and build better communities.”⁸ “The Building Code Act establishes minimum standards and technical requirements for building construction.”⁷ “Municipalities have authority beyond the OBC when it comes to shaping their communities.”⁸

Munich was the world’s first city to implement a green-roof bylaw in 1996.⁹ Toronto followed suit in 2009 and since then, other cities such as San Francisco and Copenhagen have passed laws mandating Green-roofs.¹⁰ London does offer density bonusing or other zoning incentives to developers who pursue green roof projects. There appears to be little to no buy-in when a developer is getting an extra hi-rise story for each bachelor apartment rented at 80% of market rate. A City of London by-law would not prohibit the City from offering Green infrastructure incentives such as reduced stormwater fees, tax abatements or grant programs.¹⁰

Considering that ten tons of space dust fall to earth each day¹¹, we expect that new technologies will be designed and deployed with a holistic view of the complete life-cycle within a circular economy. Remember, it was technology that got us here.

Sincerely,

Stephen Harrott

Stephen Harrott; Executive Committee Chairperson, Friends of Urban Agriculture London, ONT

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- ¹ <https://getinvolved.london.ca/12452/widgets/49288/documents/74319>
 - ² <https://www.canada.ca/en/services/health/publications/healthy-living/reducing-urban-heat-islands-protect-health-canada.html>
 - ³ <https://news.uoguelph.ca/2011/04/green-roofs-require-special-plants-gardening-techniques/>
 - ⁴ https://19january2017snapshot.epa.gov/heat-islands/using-green-roofs-reduce-heat-islands_.html
 - ⁵ <https://www.purple-roof.com/post/how-green-roofs-mitigate-heat-island-effects>
 - ⁶ <https://www.biophiliccities.org/torontos-green-roof-bylaws/>
 - ⁷ [Briefing Note - Municipal Green Development Standards](#) (Clean Air Partnership)
 - ⁸ [Towards Low Carbon Communities: Creating Municipal Green Development Standards](#) (Clean Air Partnership and Federation of Canadian Municipalities)
 - ⁹ <https://www.cityscape-intelligence.com/architecture/why-cities-across-world-are-incorporating-green-roofs-their-bylaws>
 - ¹⁰ <https://guaranicenter.org/a-review-of-green-roof-laws-policies/>
 - ¹¹ Coffee Times, South Lampton Edition, March 30 to April 5, 2022; Dunlop Marketing, Dresden, On. <https://news.uoguelph.ca/2011/09/researchers-develop-green-roofs-for-canadian-climates/>
<https://livingroofs.org/argentina-san-francisco-bylaw/>
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