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To London City Council,

RE: LONDON'S URBAN DESIGN PEER REVIEW PANEL (UDPRP)

This letter is a response to the noted subject as addressed in the following letter copy attributed to Councillors Shawn Lewis and Steve Lehman:

"Dear Colleagues,

As everyone is aware, our community, our province, and our country is in the midst of a housing crisis like nothing experienced before. Municipalities have been challenged by both the provincial and the federal governments to work to find ways to speed up and streamline processes and get approvals in place to allow builders to get shovels in the ground. To that end, we have identified the Urban Design Peer Review Panel as a significant contributor to time delays and cost increases. But more importantly the Urban Design Peer Review Panel represents a redundancy that can be easily eliminated, as it truly is a hold over from a time prior to having expertise in-house, or in having design expectations and guidelines embedded in our Official Plan. The UDPRP was implemented at a time when the 1989 Official Plan was in force and effect to address components not embedded in that plan. Today, with appeals completed and the London Plan in full force and effect, and staff in the Planning Department with Urban Design expertise, the UDPRP is now redundant.

'The Urban Design Peer Review Panel is not a legislated requirement for cities and having it review planning applications in addition to the work of our staff can add weeks or even months to an application's timeline, and none of the work is binding on our staff recommendations, on the applicant, or on Council.

Therefore, we are asking your support for the following:

That the Civic Administration BE DIRECTED to take the necessary steps to provide for the immediate dissolution of the Urban Design Peer Review Panel and provide a related information report to the Planning and Environment Committee outlining the actions undertaken with respect to this matter.

Sincerely, Shawn Lewis, Deputy Mayor, Ward 2 Councillor [and] Steve Lehman, PEC Chair, Ward 8 Councillor."

The efficiency and effectiveness of London's development approval process probably could and should be improved, however, an associated evidence-based rationale for seeking the "dissolution" of the UDPRP has not been provided in support of informed decision-making by Council.

Lewis and Lehman claim to: *"...have identified the Urban Design Peer Review Panel as a significant contributor to time delays and cost increases."*

- If that is true, they should share the facts/data/evidence in support of their claim.
 - A problem with such a claim is the lack of a legitimate comparator as no two developments are the same or are subject to an identical review. There is the fact of an approval taking a particular amount of time but there is no way to prove an approval would have taken less time without UDPRP review because any number of other factors could influence the time and cost of a development process.

Further, it is asserted: *"... the Urban Design Peer Review Panel represents a redundancy that can be easily eliminated, as it truly is a hold over from a time prior to having expertise in-house, or in having design expectations and guidelines embedded in our Official Plan."*

- The 2008 establishment of UDPRP does not predate London's in-house urban design expertise; it coincides with the hiring of former London Urban Designer, Sean Galloway. Under the direction of London City Planner, John Fleming, he established an Urban Design department with two urban design technicians that advanced to urban designers, Jerzy Smolarek and Britt O'Hagan: O'Hagan is now London's Manager, Development Planning; Smolarek, continues to contribute to London's physical quality as a private-sector urban design consultant.
 - Do those three, experienced, urban designers think the UDPRP should be eliminated?

I am a former member and Chair of the UDPRP. I don't simply dismiss Lewis' and Lehman's call for "... *the immediate dissolution of the Urban Design Peer Review Panel...*" in London. Their idea deserves serious consideration; for example, consider Lewis' and Lehman's concluding statement: "... *and none of the work [by UDPRP] is binding on our staff recommendations, on the applicant, or on Council.*"

The statement is true and as such begs the question: if those involved in the submission, review and/or approval of a development application are not required to heed UDPRP recommendations, then what is the point of the associated review?¹

Lewis' and Lehman's statement is not an indictment of the UDPRP but of their Planning and Environment Committee, the Council and the City's development approval process. The lack of authority granted UDPRP recommendations is unlike the authority associated with design panel recommendations elsewhere: for example, BC's Lower Mainland. There, most municipalities have peer² design review, some such as Vancouver for over 30 years. The recommendations of design panels are binding on applicants and are a direct report to councils. That accomplishes two things:

1. maintains a design panel's independence and integrity and the legitimacy of their recommendations; and
2. upholds a council's authority and responsibility for approval pertaining to urban design as advocated by an independent peer review of proposed urban, architectural and landscape design.

Generally, Councils defer to the professional expertise that few of their members possess. The result of this process is the acknowledged excellence of urban design in BC's Lower Mainland.

Peer design review is meant to uphold best practices and design expectations in keeping with city policy. Lewis and Lehman are correct about significant urban design policy being adopted in London since 2008: for example, *The London Plan*. The improvement in urban design is not unique to London. The quality of urban design has been advancing throughout Ontario due to:

- better urban design policy
- greater awareness, understanding and support of good urban design
- peer design review promoting, advocating and upholding best practices.

Regardless of policy and calls for good urban design, proposed development will not conform to design requirements and expectations necessarily. The role of the UDPRP in such cases is to help an applicant achieve best practices and outcomes relative to context. Independent peer review is critical in that regard because it's disinterested meaning there is no financial, professional, or political gain to panel members: the goal is good design: aesthetically, economically, socially, and ecologically, in support of a high-quality, sustainable, resilient urban environment. Lewis and Lehman suggest that city staff review will suffice to ensure the realization of such a goal. They assume "... *staff in the Planning Department with Urban Design expertise*" will have the experience necessary to understand and interpret design as it pertains to best practices and existing policy. Regardless of expertise and professionalism, City staff are not independent of Council; also, their experience and education may be limited resulting in well-meaning but uninformed recommendations. I taught two of London's former urban designers and have taught numerous other city planning and parks staff. While I am confident about the quality of their education, when hired by the City, they all lacked experience compared to UDPRP members. Certainly, in time, necessary experience may be gained as with the current Manager, Development Planning.

While time is money in land development, the time spent to ensure high quality urban design is value-added for the long-term benefit of London's citizens and environment. Keep in mind, the UDPRP is *pro bono* work by qualified professionals. Design review is a minor expense in a developer's planning and design process. To suggest otherwise while equating peer design review with a lack of housing has no merit. Rather than advocate for the "dissolution" of the UDPRP, seek to clarify and reinforce the UDPRP's role in London's land development and planning processes considering the changes to the *Planning Act* related to *Bill 23, More Homes Built Faster Act*. A commitment by Council to independent peer design review tells staff, developers and design professionals:

- design matters, and as in 2008 and in keeping with *The London Plan*,
- Council upholds good urban design with the goal of achieving more well-designed homes built faster within a beautiful, sustainable, resilient city.

¹ This question was asked at the creation of the panel in 2008 because it was known greater authority for recommendations than is the case in London, contributes to the effectiveness of peer review. I was involved in the development of London's UDPRP terms of reference with Urban Designer Sean Galloway and Architect, John Nicholson under the direction of City Planner, John Fleming. I advocated for UDPRP to be a direct report to council as with my peer design review experience in BC.

² Registered Architects and Landscape Architects vetted by their associated professional bodies: AIBC, BCSLA.