



General Statement:

The Environmental and Ecological Planning Advisory Committee (EEPAC) has many recommendations to the Urban Design Manual (Draft January 2015) document created by the City of London's Planning Services. The document itself, aesthetically appealing as it may be, is quite simply a useless document if it is to be used as a "tool" (pg. ii). The document gave no directions to developers for environmental preservation, and that was evident with the word "should" being used 422 times throughout the document (or arguably 8.44 times per page). It is weak in its delivery, and gives no support to environmental considerations, or climate change adaptations (e.g. the heat island effect in dense urban areas). Overall, the document was vague and had nonexistent guidelines for green roofs, SWM, site features, or connectivity, but did have very specific requirements for physical building structures. Please consider the following EEPAC recommendations.

1) Layout of the Paper (General)

- As this is a City of London document, it was confusing that on Pg. 7, 19, etc. that you have photos from different cities. If this is a design manual for London, then consider having photos that highlight places you would like to change. **RECOMMENDATION:** Use only locally sourced photographs.
- Sections and Subsections: they were difficult to read and didn't follow throughout the paper consistently. Numbers jumped back and forth under your subsections. **RECOMMENDATION:** Please change the sections, subsections, and numbering so it eliminates confusion. How can this be utilized as a tool if you cannot find the reference?
- Pg. ii - make sure you are consistent with the use of dashes (e.g. "0 to 5, 6-10, and 11 to 20").
- Pg. iii - why is the word "applies" not capitalized?
- Pg. 1 - For the green box at the bottom, please consider making it a more readable colour and font. Does this meet accessibility requirements?
- Thoroughly defining the words used throughout the document will allow for effective understanding of the concepts, and uniform use of the guideline. **RECOMMENDATION:** Expand the glossary for terms like "frontage", "mixed use development", "retaining wall vs. street wall", and "built form".
- Under the broad section of "connectivity" why do you not encompass ecological connectivity? **RECOMMENDATION:** Ensure that ecological connectivity is put into this section by mandating an "ecological approach".

2) Site Character & Context

- Pg. 1 - are you promising to keep the natural identity? **RECOMMENDATION:** Make a promise to keep the natural identity by encouraging a higher standard.



- Please add commas in this section.
- Pg. 2 - is “wood lot” not “woodlot”?
- Subsection D (2) - Is this point a last resort? How can you mitigate culverts to ensure they get adequate daylight?
RECOMMENDATION: Clarification is needed. Please set a standard.
- Pg. 3 - Subsection E (4) if you remove a tree are you going to replace it? **RECOMMENDATION:** Wording should be stronger to give preference to natural vegetation over development.
- Pg. 4 - Is this a design from London? This is confusing.

3) Site Organization

- Pg. 5 - What rules are we talking about? In reference to other municipalities that have implemented these rules? Does it mean that by implementing these rules, it would create a unified public space? What about private space? Do they not apply to private space?
- Pg. 5 - (Green box) Is there a certain percentage of green infrastructure that will be mandated? If so, what is the required percentage? Do you propose a better guideline for green infrastructure, and why is there not a whole section in this document outlining the requirements? It feels as though this was a last thought or consideration. Not well understood for those that do work in green technologies. **RECOMMENDATION:** Add a section for green infrastructure.
- Pg. 6 - Format subsection A the same as F2?
- Site vs. Sight? **RECOMMENDATION:** Please add the word “site lines” to the new glossary.
- Pg. 7 - Does organizing in a grid pattern work with the landscape and earlier messages about integration? Is this merely for density control? The sight features would not be preserved, that were previously mentioned as a goal of this tool. **RECOMMENDATION:** Figure out what is more important: preservation of site features, or integration.
- Pg. 8 - Why do the Subsection/Numbers change? Again, please keep it consistent.
- Pg. 8 - Could we push further and mandate permeable pavement surfaces as an LID approach? (Where possible). What about paving materials? **RECOMMENDATION:** Add a section on materials and LID.
- Pg. 12 - Under Subsection J. **RECOMMENDATION:** Reorder based on priority. Number 10 should really be number 1.
 - (4) Using a hard edge is not recommended for the initial goals of the naturalization of the edge. SWM are not meant for active neighbourhood usage. They can however be used passively.
 - (5) The design of the ponds for safety fencing depends entirely on the site design and location. The SWM requirements, size, depth, naturalization requirements, etc. should be noted.



- (11) No - SWM ponds should not be physically accessible.
- (13) What resources are available for designers to look up the intended vision for the neighbourhood?
How do SWM facilities fit the vision?
- Subsection L (2 & 7) - Why are there no sections on signs?

4) Buildings

- Subsection D (1) “Tall Buildings” should be in a glossary.
- There is no mention on decreasing avian mortality with tall buildings. **RECOMMENDATION:** Integrate building designs to mitigate avian mortality.
- Why are the pictures on Pg. 18 and 19 not from London? If you are gathering inspiration from other cities, then why not integrate the photos and tell the reader why that photo was placed. **RECOMMENDATION:** Add subtitles to the pictures to explain the design concept.
- Subsection E (1) - Why is there no complete list? Isn't that what this document is for?
- Subsection G (26) - What about signage?
- Pg. 25 (photograph) - Why did you place a picture of uniform buildings? Doesn't this violate your vision of eliminating façade uniformity?
- Subsection L (7) - Why is there no section or mention of green roofs? Nothing on usability either (i.e. patios). **RECOMMENDATION:** Add sections for usability and green roofs.

5) Connectivity

- Subsection D (2) - “Location”? You cannot locate sewer grates on a whim because their location is determined by topography, runoff, etc. Most likely, these things are determined before development even occurs.
- Subsection G (9) - No?

6) Subdivisions

- Subsection A (1) - that is the second time this is mentioned in the document. What is the benefit of a grid like pattern? What happens if a developer doesn't abide by these design concepts? Rarely does this happen in a subdivision. **RECOMMENDATION:** To manage interconnectivity, should you not take an ecological approach to the design layout? Not every area can or will benefit from a grid pattern when there are Species at Risk or other sensitive areas.
- Subsection A (4, 5, & 6) - Please define “intensity”.



- Subsection C (2 & 3) - How does this work? Also, why are there measurements for ‘block configuration’, but not found anywhere else in the document? **RECOMMENDATION:** Add quantitative measures throughout the document.
- Subsection D (10) - What are the other examples of green features? **RECOMMENDATION:** Add a section for green features.
- Subsection I (4) - Should it not read “on both sides of bridge”?
- Subsection J - What do you mean by “mixed development”? What does that mean for London?
RECOMMENDATION: Add “mixed development” to glossary.

7) Public Realm

- Subsection A (3...1) - please review your document for grammatical errors. Is this a missing subtitle?
- Subsection B (2, 3, & 7) - What about if trees aren’t preserved? Is there going to be a replacement fee? Also, there is no mention of growth space. Why? Why isn’t there any mention of local/native species?
RECOMMENDATION: Please give parameters for what happens if trees aren’t preserved, and also outline the growth space required. Give a list of local or native species alongside these requirements.
- Subsection (G) - Why is there not a list of plant materials? As we move towards LID, we need to think about the naturalization of areas, and unfortunately the use of turf grass goes against that ideology.

Thank you for taking the time to review this document. Please consider EEPAC’s recommendations in your final draft. Any questions or concerns may be directed to the Team Lead. Moreover, if you would like help revising certain sections, we would be happy to provide you with helpful resources.

Sincerely,

Meaghan Murphy BES, MES
Team Lead, EEPAC