



October 11, 2023

**Re: SUN Comments on the Mid-Rise Building Rear Transition Performance Standards (due October 15, 2023)**

Dear Mr. Duncan, Ms. Yu, Mr. Lintern, and Mayor Chow,

The recent decision to open neighbourhood zones to more intense forms of development has made planning instruments like the 45-degree angular plane and set-backs of utmost importance to achieve a balance between the need for growth and building livable cities. The 45-degree angular plane helps to arrive at appropriate height transitions for taller buildings to existing and established low rise residential communities, as well as to provide positive pedestrian-scaled environments.

We are Scarborough United Neighbourhoods (SUN), a volunteer group of residents and resident associations dedicated to dialogue with all levels of government on planning and policy action, in order to preserve and support our Scarborough communities. The SUN organization is modelled after three sister federations in the city, namely Federation of North Toronto residents Association (FoNTRA), Federation of South Toronto Residents Association (FoSTRA) and Confederation of Resident and Ratepayer Associations (CORRA). We often seek guidance from these organizations as we are working to provide a voice for Scarborough residents on important planning policy matters.

Please consider this letter our input to the City of Toronto’s consultation on the Mid-Rise rear transition performance standards in the Zoning Bylaw and Urban Design Guidelines.

**1. There is an imbalance and lack of transparency in this consultation.**

This proposal to eliminate the 45-degree angular plane at rear transition would impact properties across the city and potentially thousands of residents. A one-day consultation (September 20) and three-week window to provide input, to rush to finalize the new standard by fall 2023 is insufficient. This proposal is unknown to most Toronto residents.

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## Where are we in the process?

**December 2022:**

- Council direction to review the City’s urban design guidelines to ensure they support delivery of a range of housing forms, while furthering climate & public realm goals

**June 2023:**

- Draft Mid-Rise Rear Transition Performance Standards released

**Summer / Fall 2023:**

- Staff consulting with the public and other stakeholders

**Fall / Winter 2023:**

- Finalize the updated Mid-Rise Rear Transition Performance Standards
- Update the City’s Zoning By-law 569-2013 to incorporate the new standards
- Update Council on any feedback received about other Mid-rise Performance Standards

Prior to September 20, the City consulted only with CreateTO, Mass Timber Pilot, Intelligent City, and BILD (Building Industry and Land Development Association). During the September 20 consultation, unsubstantiated statements were made that angular planes increase costs, are bad for the environment, and have failed to accomplish their aims. These are the claims (directly quoted from e-blasts) of the political advocacy group More Neighbours, whose “volunteers” have no credibility, a clear lack of any relevant technical expertise, and who have been inundating the City’s consultations in an organized way to ensure that all other perspectives are silenced, pushed out, or ridiculed. And regrettably, City staff is complicit as they have taken no control to facilitate balanced and open meetings.

Urban planners, designers, and policy makers advocate for a more measured approach to intensification and recognize the importance of light and sky view as well as a public realm for mental well-being and climate resilience. [[Daylight, sunlight and solar gain in the urban environment - ScienceDirect](#),[Students in Munich reveal the importance of sunlight in cities | The Urban Activist](#),[Daylighting and Urban Form: An Urban Fabric of Light \(tennessee.edu\)](#)]

Is it not the goal of TransformTO to create complete, climate resilient communities? What about the transition to net zero, reducing electricity use for lighting and options for solar power?

Lastly, on the matter of process and openness, these meetings are not transparent to the public because participant names are not shown, comments or city responses are not documented publicly, it is not known who is raising hands or speaking, etc. The process needs to be corrected immediately, and meetings be made hybrid with in person attendance for "ALL City Public meetings".

**2. The City has presented no evidence or data to substantiate the new proposal and the elimination of the 45-degree angular plane.**

What is the evidence that the resulting reduction in sunlight and sky view on the rear properties would not have material impact on the well-being of the residents or livability of the properties? Even worse, the shadow study diagrams shown in the September 20<sup>th</sup> consultation depicted only Avenues and the study of shadow impacts on EW avenues were not shown – the reason given: “in order to not inundate participants with diagrams” (direct quote). Shadow studies on EW avenues would have shown that the homes or schools located directly to the east (E) of an 11-storey building are in complete shadow beginning at 5pm, a time when families return from work or school and especially after the September equinox when day light becomes shorter, days become colder and people begin to feel the effects of Seasonal Affective Disorder. In fact, depending on the width of the neighboring properties the shadow could be cast over as many as 10 properties!

The proposed rear transition to Parks and Open Spaces more appropriately is intended to maximize access to sunlight and minimize shadow to the park or open space. Why do residents in neighbourhoods not deserve the same consideration?

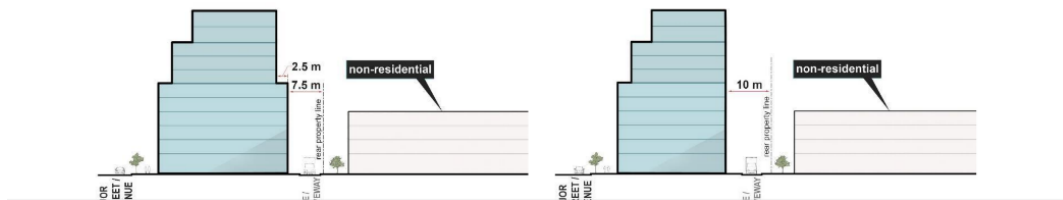
## 5B - Rear Transition to Parks & Open Spaces

The transition between a mid-rise building and parks, open spaces or natural areas to the rear should maximize access to sunlight and minimize shadow on the park, open space, or natural area through a combination of setbacks, step-backs and/or angular planes.

Furthermore, non-residential buildings are not equal. The proposed standard cannot apply equally to institutional buildings such as schools or nursing homes, where minimizing shadow impacts and maximizing access to sunlight are imperative!

## 5D - Rear Transition to Non-Residential Buildings

The transition between a mid-rise building and non-residential building areas to the rear should be created through a combination of setbacks and step-backs, ensuring liveability of the mid-rise building.



### 3. The City is making bad decisions by popular vote.

Who are the 67% who supported the proposal? This statement was made during the presentation. Shouldn't a change of this magnitude justify an independent, randomized poll across the City?

In closing, evidence-based decision making is critical when it comes to changing our City. The intent of angular planes was to “get the maximum density with minimal impact” – which is good planning. And, contrary to what More Neighbours would have us believe, people are not shade tolerant plants.

We feel this proposal is flawed, unbalanced and uninformed, and we ask that it be revised and that Planning and Housing Committee not adopt this proposal in its current form. This proposal will not achieve a balance between need for growth and building livable cities.

Sincerely,  
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SCARBOROUGH VOTES!  
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