The Office for Architecture & Urban Design

10 June 2026

Attn: Mariana Da Silva,
Planner Development Review,
City of Burlington

Subject: 198, 200 & 206 PLAINS RD. E, BURLINGTON, ON, Shadow Study.

The following set out our responses in relation to the comments from dated 1 June 2026.

Comment	**Response OUAD**
Provide justification as to why the assessment was limited to Sidewalks and the Public Realm (Section 4.6 of the Shadow Study guidelines).	Based on the shadow study, the entirety of the outdoor amenity area for 218 Plains Rd was not impacted by shadow for the majority of the test intervals, guaranteeing a sun access factor greater than 0.5. The rear yard of 212 Plains Rd E has no amenity area as it is entirely used for parking.
It appears that the impacts on Private Outdoor Amenity Spaces (Section 4.3 of the guidelines), including rear yards, decks, patios, and common outdoor amenity areas on neighbouring properties, were not analyzed despite the potential for shadow impacts on these areas. Please provide the rationale for excluding this section from the assessment.	The rear yard of 212 Plains Rd E is impacted by shadow between 1pm and 6pm test times on 21 March. The entirety of the rear yard is dedicated to parking for a commercial property, and does not meet the definition of amenity area based on the Residential Zoning By-law Definitions. A small portion of the rear yard of 218 Plains Rd East is impacted by shadows at the 5pm and 6pm test times on March 21st, which represents only 2 of 9 test intervals, and results in a SAF lower than 0.5. A small portion of the open area of 218 Plains Rd E is impaced by shadow starting at 2pm and finishing at the 6pm test time. As the area is only impacted for 4 out of the 9 test intervals, we know the Sun Access Factor will be greater than 0.5 without having to provide detailed calculations. Furthermore, this impacted area represents a small portion of the outdoor amenity area for 218.
In addition, please provide the Sun Access Factor (SAF) calculations for both these sections in accordance with the guideline calculations (Section 4.3 and 4.6).	Existing and proposed buildings would cast a shadow on the opposite sidewalk at the 9am and 10am test times on 21 March. Section 4.6 of the Shadow Study Guidelines states. "shadows cast by all existing buildings and proposed developments onto the full extents of the boulevard and sidewalk on the opposite side of the adjacent right-of-way, must allow for full sunlight 50 per cent of the time." As there is full sunlight on the opposite sidewalk at 8 of the 10 test times, the proposed development meets this rule without the need to calculate the SAF.

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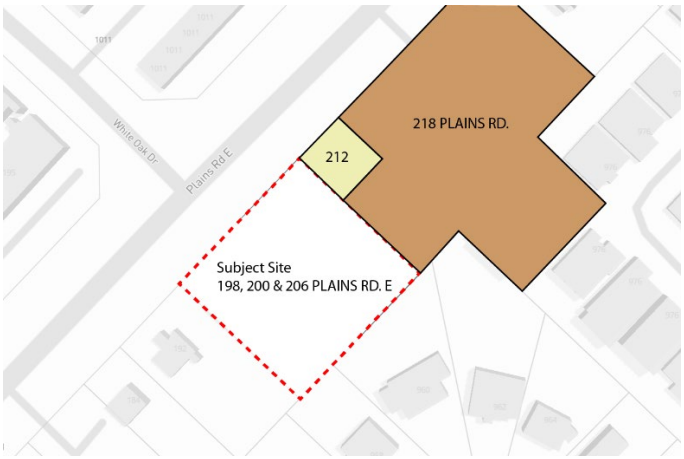


Image: Location of subject site in relation to neighbouring properties impacted by shadows cast from the proposed development.

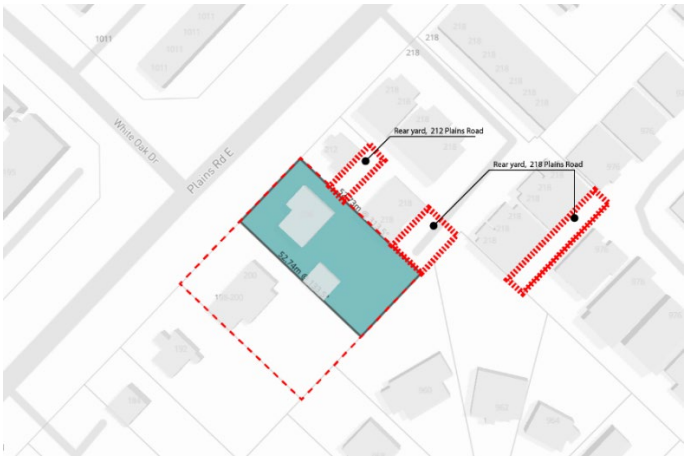


Image: The above image shows the rear yards for 212, and 218 Plains Road E.



Image: The parking and driveways for 212 and 218 Plains Rd E are shown in yellow. The amenity area for 218 Plains Rd E is in green.

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Based on the above supplemental review and the original shadow study, the proposed development results in only a minor shadow impact on the adjacent properties. The impacted amenity areas continue to receive sunlight for more than 50% of the tested times; therefore, the Sun Access Factor is greater than 0.5 and the proposal meets the City's criteria. In addition, the shadow impact is limited to a small portion of the overall amenity area at 218 Plains Road East. While the Terms of Reference do not appear to specifically require each individual amenity area to be assessed separately, even if the affected yard area were reviewed on its own, it would continue to satisfy the City's sun access requirements. On this basis, we conclude that the proposed development meets the applicable shadow impact criteria.

We trust the above helps provide the clarity requested. Should you have any further questions or comments, please feel free to contact us directly.

Sincerely,

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