



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH8.6 - Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-only organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

Position

More Neighbours Toronto wants to ensure that the City takes a holistic approach to the environment and housing. The City has done excellent previous work, which is referenced in the background material, but the recommendations themselves center low-rise Neighbourhoods. **We therefore recommend the following amendments to PH8.6:**

- Amend recommendation 1 to read “City Council request the Chief Planner and Executive Director, City Planning, in consultation with the Acting General Manager, Parks Forestry and Recreation to review the Official Plan policies with respect to protection of existing trees and expansion of tree canopy, **in combination with Official Plan policies about affordable housing choices that meet the needs of everyone throughout their life and equitable access to the public realm, as well as policies related to protection of the Greenbelt and potential impacts of urban sprawl**, when permitting infill housing and report back to the Planning and Housing Committee on potential updates to the Official Plan policies by Q4 2024.”
- Amend recommendation 2 to read “City Council request the Chief Planner and Executive Director, City Planning, in consultation with the Acting General Manager, Parks Forestry and Recreation, to review the city-wide Zoning By-law 569-2013 for opportunities to further support, protect, and enhance growing space for tree growth, including a review of the definitions of landscaping and soft landscaping and landscaping regulations in low-rise residential zones, **as well as the effects in other residential zones and the relationship to the tree equity approach included in its Tree Canopy Target (re-affirmed in 2021.IE26.6)**, and report back to the Planning and Housing Committee on opportunities to update the Zoning By-law by Q4 2024.”

- We request that More Neighbours Toronto and [Environmental Defence](#) be included in the list of relevant stakeholders in recommendation 7.

More Neighbours Toronto is pleased to see the early success of the Expanding Housing Options in Neighbourhoods program and the limited tree impacts. We encourage the City to continue exploring approaches like that in the Official Plan Amendment for multiplexes, which authorizes variances like height or reduced setbacks for low-rise construction when needed to preserve trees and improve sustainability. The replacement of floor space index with form-based measures of density throughout low-rise areas of the city (PH8.3 Phase 2) is also key to tree preservation. Continued monitoring and expansion of these approaches will further increase flexibility, facilitate infill housing and preserve tree canopy.

We are in strong agreement with the Climate Impact segment of the background report, which notes that infill housing reduces greenhouse gas emissions through more efficient land use, increases walkability, reduces urban sprawl, promotes building material reuse and more easily achieves net zero emissions. It is for this reason that we suggest amending the recommendations so that the environmental effects of Toronto's tree bylaw are considered in conjunction with overall regional environmental impacts. We note [the letter from Environmental Defence on PH3.16 for multiplexes](#), which explained the environmental benefits of a good multiplex policy and provided important data on the effects of sprawl on tree cover, farmlands and wetlands.

Additionally, [pg. 9 of the Chief Planner's report](#) for this motion notes that Neighbourhoods both have the "greatest amount of possible pervious planting area" and the greatest rate of land conversion from pervious cover to impervious cover, which has been driven primarily by single-/semi-detached housing development or expansion. This led to a decline in tree canopy by 4% from 2008 to 2018; even in neighbourhoods with substantial community engagement around the issue such as Long Branch. Please include these considerations and consult with Environmental Defence when reviewing the bylaw.

However, More Neighbours Toronto believes that some key points are missing from the Equity Impact statement that must be considered when updating the tree bylaw. Firstly, restrictive bylaws in low-rise Neighbourhoods force growth into a small number of areas of Toronto. This increases the likelihood of apartment teardowns - we are now seeing buildings of 12-storeys and more being torn down to accommodate growth in this limited area. Not only does this have negative environmental effects from embodied carbon, long construction times and limited material reuse, but it increases the risk of displacement and stress for apartment residents. Feasible bylaws that permit growth in low-rise Neighbourhoods relieve pressure on high-growth neighbourhoods.

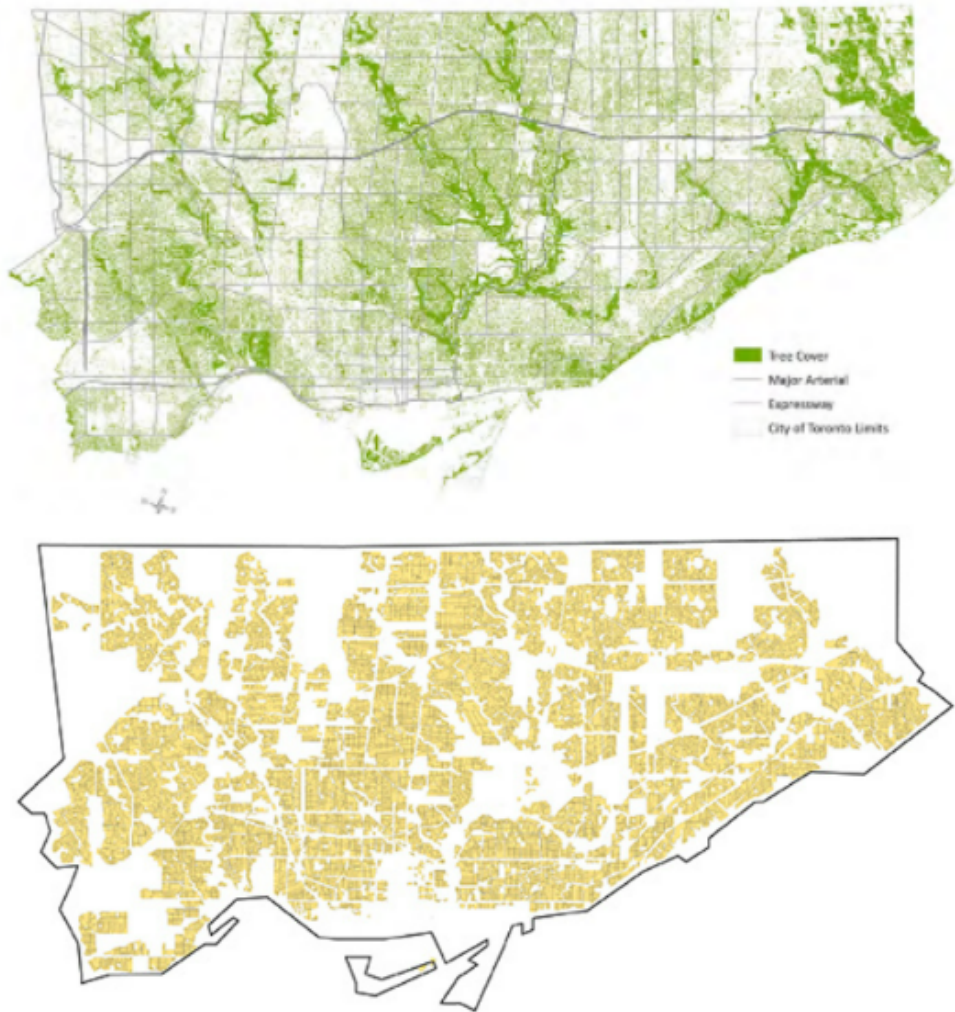
Secondly, there is a known inequity in access to urban forests. This was noted when the Tree Canopy Target was re-affirmed in 2021. IE26.6 and a tree equity approach was recommended. Although this item is noted in the Decision History and background, mention of tree equity is absent. The US work that motivated this approach notes that urban heat island effects are concentrated in low-income areas and Toronto's tree canopy is similarly inequitably distributed (see Figure below). In 2013, [heat contributed to an estimated 120 premature deaths](#) and this is likely to worsen as extreme temperatures become more common. Discussion of balance when re-examining the tree bylaw must weigh the

seriousness of this inequity and should avoid bylaws that result in further exclusion from low-rise neighbourhoods or poor outcomes for urban growth centres.

Finally, the City's no net new shadow policy for public parks limits the ability for apartments to be built nearby and so limits access to many ravine spaces. This affects the relationship between Toronto residents and the public realm. It appears that this policy will be relaxed for the affordable housing in the proposed apartment at 931 Yonge St, allowing 85 more homes near this park. The federal Minister of Housing, Infrastructure and Communities has also [recommended re-evaluating this policy](#). In combination with a more flexible tree bylaw, these changes will allow more Toronto residents easy access to the public realm and a greater appreciation of our urban forest.

Housing and the environment are both regional problems. Toronto's tree bylaw and Official Plan policies related to trees should not be considered in isolation or solely as policies that impact residents of low-rise Neighbourhoods. Please update the recommendations and list of stakeholders to reflect that counterfactuals will be considered in the evaluation, including urban sprawl and the consequences of insufficient or inequitable growth.

Regards,
Colleen Bailey, Thaddeus W. Sherlock
More Neighbours Toronto



City maps demonstrating the geographic correspondence between the tree canopy and Neighbourhood designation.