



**MORE NEIGHBOURS  
TORONTO**

Dear Planning & Housing Committee,

**Re: 2025.PH21.6 - Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes - Proposals Report**

***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 recognizes that the City is trying to maintain a balance between new housing development and tree protection. However, we are concerned that the proposed Official Plan and Zoning By-law Amendments prioritize tree protection alone over housing development, which would undermine their stated intent. We would like City Planning staff and members of the Planning and Housing Committee to consider the comments presented below in the Final Report for this item.

We are pleased to see [the Chief Planner's report](#) consider the balance of tree cover and infill housing development, as well as benefits trees directly provide to this housing, in its Equity Impact and Climate Impact statements. A strong combination of dense housing and flora, including trees and native plants, would make green space accessible to more Torontonians.

However, the proposed Official Plan and Zoning By-law Amendments only add new restrictions related to preservation of trees, they provide no offsetting increases to the permitted building envelope. That is not a balanced approach. The City of Toronto is faced with both inequities in tree canopy cover and a target of building 285,000 new housing units by 2031. We urge City Planning and the Planning and Housing Committee to consider easing requirements in response to new tree canopy requirements. This will ensure that a green city does not come at the expense of an affordable city.

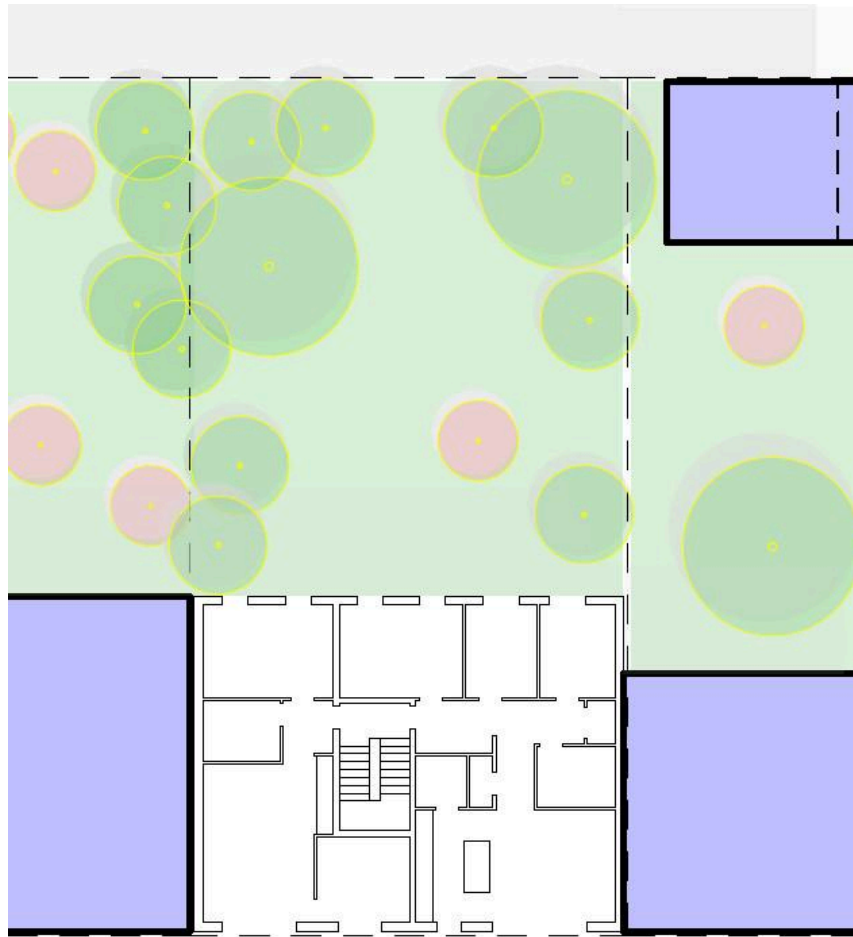
For example, the new proposed Official Plan policies for Neighbourhoods related to preservation of trees add new conditions that must be met for development in addition to the existing set of conditions. It could have said that deviations from existing conditions, such as variance from the local pattern in terms of size and configuration, may be allowed *in order to preserve* the existing tree canopy. This would have allowed a more harmonious balance of new housing and tree canopy concerns.

Similarly, the guidance to exclude artificial turf and permeable pavements from the definition of soft landscaping in the Zoning By-law could have been offset by an increase in the allowed height to ensure that new housing applications will not be forced to reduce the livable floor area as a result of these changes.

The proposed [Zoning By-Law Amendment prohibiting iceberg homes](#) is appropriately limited to detached houses. The staff report mentions four total CoA applications being heard which qualify as iceberg homes, all of which involved detached houses. We are pleased that City Planning did not propose preemptively applying these requirements to multiplexes and apartment buildings.

That said, we believe it is worth considering why iceberg homes are starting to be proposed in the City of Toronto. People are finding it too difficult to build new housing above ground, and so are increasingly looking to add it underground. This is not the sign of a city with a healthy housing policy, and as noted by City Planning, these buildings are not good for the tree canopy. We encourage City Planning to consider increasing height limits in residential zones so that iceberg homes stop being necessary.

As for next steps, Toronto City Council should continue to advocate for Ontario to amend the Building Code to permit single stair egress, as has been done in Seattle and other cities. These reforms allow for greater flexibility in building envelopes that not only leave greater portions of a lot free for tree planting, but also allow for greater options for housing densification and soft landscaping on narrower or unconventionally-shaped lots. This would further the City's stated goals [under the proposed policies 4.1.9 g\). and 4.1.14](#) for the Official Plan.



Exemplar site plan drawing for a building containing a 2-bedroom, a 3-bedroom unit and a single-stair exit on a 50' (15.24 m) wide lot and resulting space for tree cover. Courtesy of Mike Eliason (Source: <https://bsky.app/profile/holz-bau.bsky.social/post/3lhwfga4fek2p>)

We would also ask for City Planning to consider the impact of housing on tree canopy holistically. If tree canopy requirements in the City of Toronto simply force development into greenfield sites elsewhere, it is not clear that the City is achieving its goals. City Planning should also watch out for unanticipated consequences. It would be bad if tree canopy preservation requirements created an incentive for property owners to neglect tree maintenance in order to avoid filing an Urban Forestry permit application.

Sincerely,

Thaddeus W. Sherlock and  
Damien Moule  
More Neighbours Toronto