

councilmeeting

From: Brad Bryson <bbryson@pplgroup.com>
Sent: January 31, 2026 6:59 AM
To: Clerk
Subject: [External Sender] Correspondence for Agenda Item PH27.1 – Growing Space for Trees
Attachments: PPL Letter to City of Toronto.pdf

Good morning,

Please find attached correspondence for inclusion with Agenda Item **PH27.1 – Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing.**

I respectfully request that this letter be circulated to Members of Council and included as part of the public record for this item.

Should City staff or Members of Council wish to discuss the technical considerations outlined in the letter, I would be pleased to make myself available.

Thank you for your assistance.

Kind regards,



Brad Bryson NSPFI, CAEA, AST

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January 31, 2026

City Clerk
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Re: PH27.1 – Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing – Concerns Regarding Reclassification of Pools and Hot Tubs

Dear Mayor and Members of Council,

I am writing on behalf of PPL Aquatic, Fitness & Spa Group Inc., a Toronto-area commercial and residential aquatic contractor that has worked extensively with homeowners, condominiums, and municipalities throughout the city for decades. I also write in my capacity as Toronto Chapter President of the Pool & Hot Tub Council of Canada, and Chair of the National Education and Technical Committees for the National Pool & Hot Tub Council of Canada, representing many professional pool builders and service providers operating within Toronto.

Our industry strongly supports the City's objectives to protect and enhance the urban tree canopy and to address concerns related to oversized "iceberg homes." However, we have significant concerns regarding the proposed technical amendment that would reclassify outdoor swimming pools and hot tubs as elements that no longer contribute to soft landscaping calculations in rear yards.

While this adjustment may appear administrative in nature, the practical effect on homeowners, the permit process, and City resources will be substantial.

By excluding the water surface of pools and hot tubs from soft landscaping metrics:

- Many typical backyard pool installations that currently comply with zoning will, on paper, fall below the required soft landscaping percentage, despite maintaining significant planting, drainage provisions, and green space.
- A large number of otherwise straightforward residential projects will be pushed into the minor variance process, increasing cost, delay, and uncertainty for homeowners while adding avoidable volume to the Committee of Adjustment.
- Reasonable, well-designed backyard amenity projects may become effectively prohibited, not because of actual impact on trees, drainage, or neighbours, but because of how pool water area is categorized within the bylaw.

This change does not alter the actual environmental impact of these projects, but it does distort how lot coverage is calculated on paper. The result will be a significant increase in minor variance applications for properties whose environmental footprint has not changed at all.

From a functional standpoint, a swimming pool does not behave like hard paving. It does not generate additional building mass, it does not create roof runoff, and it does not eliminate opportunities for tree preservation, planting, or permeable drainage solutions around it. In many cases, pool projects are designed specifically around preserving existing trees and enhancing the usability of landscaped rear yards.

In fact, when assessed using the same environmental criteria typically used to define hardscape, pools do not meet that definition. Hardscape is characterized by heat retention, impermeability, and runoff generation. A pool does none of these. The water surface moderates heat rather than storing it, produces a localized cooling microclimate, and does not shed stormwater. From an environmental performance perspective, a pool behaves more like a pond, water garden, or naturalized water feature than a paved surface.

Importantly, a pool does not create additional impervious load on the lot. It does not shed runoff or increase burden on the stormwater system. Any regulation of drainage is appropriately addressed through the surrounding deck and landscape design, not the water body itself. Assigning hardscape status to a pool incorrectly attributes stormwater impact to an element that does not produce it.

Backyard pools and hot tubs also serve an important role that should be recognized in policy decisions:

- They create meaningful at-home recreational space for families of all ages, encouraging outdoor use of residential properties.
- They support local recreation and “staycation” living within the city.
- They provide measurable health benefits through low-impact exercise, rehabilitation, and water-based activity for people with mobility limitations.
- They create safe, supervised environments where children learn swimming and water-safety skills.

Many municipalities that prioritize tree protection, watershed management, and green infrastructure continue to recognize pools as soft landscape features for precisely these reasons. Maintaining this classification aligns with established municipal practice and ensures environmental assessment remains based on functional performance rather than categorization.

We respectfully request that Council amend the proposed provisions so that swimming pools and hot tubs are not categorically excluded from rear yard soft landscaping calculations, and that their classification reflect their actual environmental and functional performance rather than being grouped with hard paving elements.

A more balanced approach could recognize that where tree preservation, planting, and proper drainage measures are incorporated into the design, some or all of a pool’s water surface area can reasonably be acknowledged as part of the landscaped amenity space, or be treated distinctly from true hard paving surfaces. Without such adjustment, the bylaw risks creating unintended barriers for homeowners, increasing bureaucratic burden, and reducing access to a valuable recreational and health amenity that has long been part of Toronto’s residential landscape.

We would welcome the opportunity to participate in any further technical discussions with City staff to help develop an approach that meets tree protection objectives while still allowing responsible backyard pool development as-of-right where appropriate design measures are provided.

Thank you for your consideration.

Yours truly,

Regards,



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