

1/27/2026

Toronto City Council
Toronto City Hall
100 Queen St. West
Toronto, ON M5H 2N2

Attention: Sylwia Przedziecki

Dear Members of Council:

RE: 2026.PH27.1, Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes

We support the City's objective to protect and enhance the urban tree canopy and recognize the important role that adequate soil volume and growing space play in supporting healthy, mature trees.

However, applying above-grade setback requirements to below-grade construction for multiplexes would create significant practical challenges on constrained urban lots. We kindly recommend multiplexes to be exempt from applying above-grade setback requirements below grade.

Infill development sites are often impacted by extensive below-grade utilities. Requiring above-grade setbacks to be applied below grade would significantly restrict the buildable envelope and could require costly and disruptive utility relocations that are not feasible for many projects. These constraints would undermine the viability of multiplex housing. Below-grade space is necessary to accommodate servicing, mechanical systems, storage, and life-safety infrastructure. Maintaining flexibility for below-grade construction infrastructure, while continuing to regulate soft landscaping, soil volume, and tree planting performance, provides a more balanced approach.

Sincerely,

Hullmark Developments Ltd.
Per:

Edmund Un
Senior Planner, Development