



Dear Planning & Housing Committee,

Re: 2025.PH26.2 - Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes - Recommendation Report

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer 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 is pleased that the City chose to examine the tree by-law and infill housing together in PH26.2. [At the proposals report stage](#), we were concerned that the proposed amendments dealt only with trees and not with infill housing, despite the intent to consider both aims. Since then, staff have simplified the OPA and added a section for variances to be considered for infill housing when trees are preserved. However, we would like more consideration for permeable pavements, green roofs and other stormwater mitigation measures

The new OPA section 4.1.14 is similar to the OPA for the Expanding Housing Options in Neighbourhoods multiplex program. Although it has been in effect for only two years, this program has seen an increase in multiplex infill housing, even as [other types of housing have seen large decreases in starts](#). The [multiplex monitoring report](#) also did not indicate any significant tree loss. The most prominent cases have been issues with enforcement of the existing tree by-law rather than with the by-law itself. This demonstrates that we do not need to choose between a flexible infill housing approach and tree canopy protection.

We would particularly like to thank Liora for her engagement and effort to address our concerns on this through email and at the library. We encourage the City to allow time to study the new EHON-inspired approach to trees and infill housing through their monitoring program before implementing further changes.

We are disappointed that the advantages of permeable pavements and green roofs are not distinguished from impermeable surfaces in landscaping. Although permeable pavements may not offer the full advantages of soft landscaping, they help to address stormwater runoff, an issue of growing concern in Toronto. A holistic approach should compare green roofs and permeable pavements not just with soft landscaping, but with the current situation in many low-rise Neighbourhoods that struggle with stormwater management, where many detached homes have impermeable driveways. In addition, if it is not feasible to build infill housing because of landscaping restrictions, growth may be forced into more distant greenfield sites. We encourage Council to continue to look for and encourage innovative approaches to stormwater management, including proposals addressing excessive impermeable spaces on grandfathered properties or leveraging curbside space for stormwater capture and infiltration.

This should include a re-examination of height and floor space index (FSI) limits in low-rise Neighbourhoods. As noted in the [original report](#), most areas converted from pervious to impervious cover between 2008 and 2018 were in low-rise Neighbourhoods, many of which have lost population. This period pre-dates as-of-right permissions for garden suites and multiplexes. This suggests that there is little relationship between tree loss and local population growth. In fact, comparing the citywide maps of height and FSI with a map of tree canopy loss suggests that areas in Etobicoke and North York with the most restrictive rules have seen the greatest tree canopy loss (Figure 1). It is therefore worth considering how greater permissions for aboveground building space help to preserve growing space for trees without reducing livable floor area or discouraging family friendly homes.

Similarly, iceberg homes may be an indication that it is too difficult to build new housing above ground. Although the number of reported iceberg homes is quite small, the proposed changes may help to address flooding issues in some areas where they are concentrated. It is not clear why multiplexes have been added to this item since the proposals report, nor how many multiplexes with such basements exist. We are pleased to see the city recognize different standards for apartment buildings, which often use underground space for parking, storage and equipment, and which already have strict requirements for foundation drainage in addition to development charge contributions for sewer upgrades. We encourage City Planning to consider increased height limits in low-rise residential zones to further discourage iceberg homes without reducing living space.

The City of Toronto is faced with both inequities in tree canopy cover and a target of building 285,000 new homes by 2031. The recent success of the EHON program demonstrates that more flexible zoning policies can help the City achieve both of these goals. A green city does not have to come at the expense of an affordable city.

Sincerely,

Colleen Bailey,
More Neighbours Toronto

Tree Cover Change by Neighbourhood

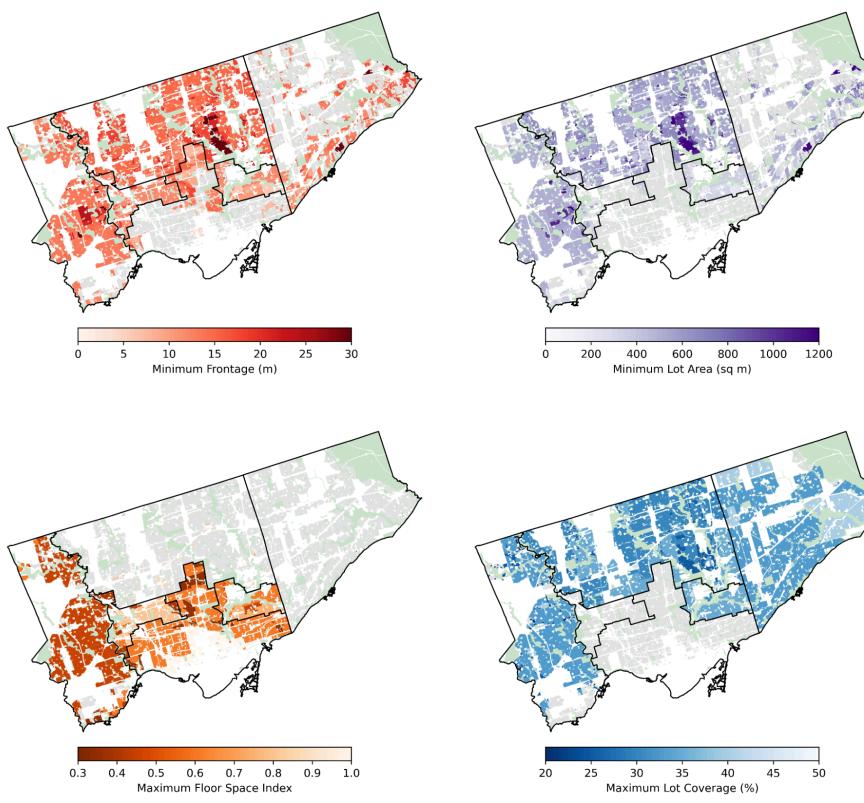
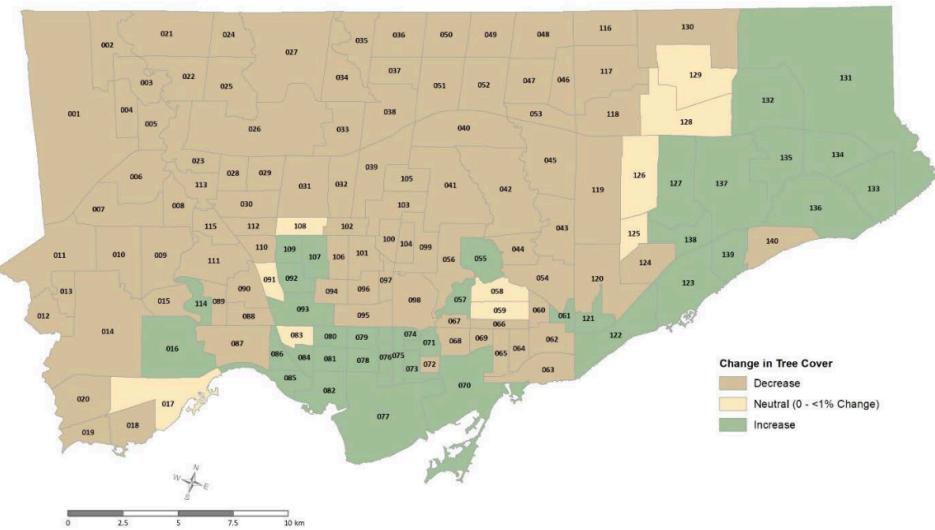


Figure 1: Maps of Tree Cover Change by Neighbourhood from the [City of Toronto's Tree Canopy study](#) alongside maps of the minimum lot frontage, minimum lot area, maximum floor space index and maximum lot coverage from [City Hall Watcher](#) with Toronto Open Data.