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Toronto City Hall
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**PH26.2 - Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes - Recommendation Report
Meeting December 03, 2025**

Dear Chair Gord Perks and Committee Members:

The Lytton Park Residents' Organization (LPRO) is an incorporated non-profit organization, representing residents living in the area bounded by Lawrence Avenue West to Roselawn and Briar Hill Avenues, Yonge Street to Saguenay and Proudfoot Avenue.

Trees must be protected as an essential tool to help Toronto deal with unprecedented high temperatures, flooding and climate change. "Iceberg" homes should not be permitted as they eliminate soil required to sustain trees and they interfere with proper stormwater management.

The November 18, 2025 Planning Report offers recommendations to enhance and protect Toronto's tree canopy, and to avoid adverse impacts on Toronto's stormwater management and urban forest from "iceberg" homes that extend below ground, often well beyond the setback of the above-ground building.

We support the recommended zoning by-law additions regarding trees and soft landscaping to Neighbourhoods and Apartment Neighbourhoods.

- to protect the tree canopy
- to maximize contiguous soft landscaping within front and rear setbacks supportive of maintaining and enhancing the tree canopy
- to protect existing mature trees on infill development sites and adjacent properties by modifying variances as necessary to accommodate tree preservation
- to locate, mass and design new buildings to protect the tree canopy
- to locate, mass and design new buildings to maximize areas of soft landscaping that support the growth of new tree plantings to maturity
- to plant new trees and provide space for soft landscaping to support tree growth

We support the Planning Report updates to conditions for Committee of Adjustment applications requiring new trees and protecting their growing spaces. Protections must be added to address impacts on climate change, and to prevent Committees of Adjustment from approving variances that result in tree removals and degrading of Toronto's climate-change and stormwater management plans.

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<https://lyttonparkro.ca/>

For many years, the North York Committee of Adjustment (CofA) has approved excessive minor variance applications that permit applicants to wipe out trees and soft landscaping. When requested, the CofA has sometimes permitted the building of an extensive below-ground living space beyond the above-grade building outline. These exemptions very often replace a one-family home with a significantly larger one-family home with no addition to the number of dwelling units.

Iceberg Homes. The below-ground built area, while invisible above grade, eliminates valuable soil and water absorption space needed for healthy trees and proper stormwater management for the subject and surrounding properties. **We support the zoning by-law changes whereby building setbacks apply to portions of building above and below ground.**

Soft Landscaping ensures provision of growing space for a healthy tree canopy and other vegetation. It helps absorb stormwater at the source and reduces the urban heat-island effect. **We support the changes to the zoning by-law to exclude the following from soft landscaping: hard-surfaced areas, artificial turf, and outdoor swimming pools.**

Below are suggestions to improve Toronto's tree canopy received from the Community

- Plant trees on all City boulevards where none exist.
- Implement tougher tree-protection by-laws as the current ones are too weak and easily circumvented.
- Significantly increase the monetary value of trees. The existing criteria for evaluating Toronto's urban forest are GROSSLY understated. Experts say cities should consider climate-related benefits. Trees enhance air quality, provide shade and reduce local energy consumption. They can increase property value.
- Greatly increase fines for tree damage and removals. Current fines are meagre in comparison to the many millions of dollars that a typical oversized home can sell for.
- Revoke Committee of Adjustment approvals and/or building permits for any property where tree removals violate the by-law regardless of who caused the damage.
- Annually increase fines for tree removals and/or harms by the rate of inflation.
- Include effects on climate change as a factor in Committees of Adjustment decisions.

Sincerely,

Maureen Kapral
President, Lytton Park Residents' Organization

c Deputy Mayor and Ward 8 Councillor Mike Colle