

**From:** [Mason Johnston](#)  
**To:** [Planning and Housing](#)  
**Subject:** [External Sender] My comments for 2025.PH26.2 on December 3, 2025 Planning and Housing Committee  
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To the City Clerk:

Please add my comments to the agenda for the December 3, 2025 Planning and Housing Committee meeting on item 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

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

Comments:

Thank you for your ongoing work on the Toronto Official Plan and its supporting policies. I am writing to share concerns regarding the proposed amendments related to expanded tree protection, reductions in permitted removals, and modifications to development standards. While the objective of strengthening Toronto's tree canopy is broadly shared, several of the proposed changes risk undermining Council's adopted housing targets, provincial housing obligations, and the City's broader policy direction on intensification and housing affordability.

Below are key considerations I respectfully urge Council and staff to factor into deliberations:

1. Misalignment With Council's Housing Supply and Intensification Goals

Several amendments such as expanding protected tree categories, lowering diameter thresholds, and applying front-yard setback requirements to below-grade components (e.g., electrical meter rooms essential for multiplex compliance) would constrain the viable building envelope on many urban lots. This is particularly significant given that small-lot infill and multiplex development are core to Council's strategy for expanding "missing middle" housing.

By reducing flexibility in already constrained urban parcels, these changes could materially reduce the number of feasible projects, especially in areas targeted for gentle intensification.

2. Increased Process Complexity, Cost, and Approval Times

Enhanced protection regimes will require additional arborist assessments, formal applications for removals, mitigation plans, and potential appeals for even routine small-scale development. Toronto already has some of the longest planning and permitting timelines in the country; adding another layer of discretionary review particularly one that applies broadly across most established neighbourhoods risks further prolonging approvals.

Longer timelines and higher compliance costs ultimately translate to fewer units delivered and higher per-unit costs, undermining affordability goals.

### 3. Risk of Suppressing Missing-Middle and Affordable Housing Production

Multiplexes, laneway/garden suites, and small-scale infill projects are especially sensitive to regulatory friction because:

- projects are modest in size and carry low margins
- they often occur on sites with at least one mature tree
- each incremental delay or redesign increases project risk, reducing feasibility

Expanded tree protection especially lower diameter thresholds could prevent or significantly delay many such projects, at odds with Council's direction to expand diverse, lower-cost housing options outside major growth centres.

### 4. Impacts on Residents, Small Builders, and Neighbourhood Improvements

The proposal to exclude pools from soft landscaping calculations and to increase setback requirements for below-grade elements would make common homeowner-initiated improvements more difficult and costly, including small additions, suites, and routine property reinvestment. This disproportionately affects households not major developers and contributes to reduced private-sector participation in gentle density creation.

### 5. The Need for a Balanced, Evidence-Based Approach

Toronto's canopy objectives are important, but they must be pursued with recognition that:

- housing delivery is at a critical inflection point, with Council-approved targets far above current production levels
- the majority of mature trees grow on residential lots where small-scale development occurs
- over-protection can inadvertently entrench exclusion, reduce mobility, and push needed housing supply elsewhere

Effective policy should integrate canopy growth with housing production by focusing on:

- net-new tree requirements rather than blanket restrictions
- prioritizing canopy expansion in underserved areas
- clear, predictable, and timely permitting processes
- ensuring urban forestry policies align with housing and climate objectives, rather than exist in tension with them

### 6. Overlooking the Prevalence of Invasive Species and Missed Opportunities for Ecological Restoration

Many overgrown and undeveloped sites in Toronto contain a significant proportion of invasive or ecologically low-value species, such as Norway maple, buckthorn, Siberian elm, and Manitoba maple. These species suppress native biodiversity, degrade local ecosystems, and crowd out long-lived native canopy trees that the City aims to promote.

A generalized “save all canopy” approach does not distinguish between:

- trees that contribute meaningfully to long-term canopy and ecological health, and
- invasive species that actively undermine those objectives.

Developers are often the only actors who remove invasive specimens at their own cost and replace them with native, high-quality species as part of approved landscape plans. This work directly supports Council’s biodiversity and climate goals, yet overly restrictive removal policies could make such ecological restoration more difficult—or impossible by mandating the preservation of invasive canopy and preventing the introduction of resilient native species.

A more nuanced regulatory approach would allow the City to:

- prioritize preservation of high-quality native trees
- encourage the removal and replacement of invasive species
- support developers in contributing to meaningful, long-term canopy improvement

This aligns far more closely with both environmental and housing objectives.

#### Recommendation

Given the substantial implications of the proposed changes, I respectfully request that Council direct staff to:

1. Conduct additional analysis on the impacts to multiplex and small-scale infill feasibility
2. Model expected reductions in eligible development sites under expanded tree protections
3. Assess the ecological implications of preserving invasive canopy species
4. Return with options that balance canopy expansion with Council’s direction on accelerating housing supply
5. Align the amendments with the Housing Action Plan and provincial housing targets to avoid unintended conflicts across policy areas

This approach would ensure Toronto advances both environmental resilience and housing affordability in a coordinated, evidence-based manner.

Thank you for your consideration and for your ongoing commitment to improving Toronto’s planning and policy framework.

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