



December 2, 2025

Councillor Perks, Chair, Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON
M5H 2N2

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

Dear Chair Perks,

Our organizations are writing to provide comments to the Planning and Housing Committee regarding Agenda Item *PH26.2 Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes - Recommendation Report* and the City's ongoing efforts to strengthen tree protection and expand the urban canopy within the context of infill development.

At the outset, we wish to express our general support for the City's objective of preserving mature trees and ensuring the planting of new, high-quality trees as redevelopment occurs. Mature trees play a vital role in shaping complete, livable communities and remain essential to maintaining a strong connection to nature in an increasingly urbanized environment. The City's commitment to enhancing the tree canopy is both commendable and consistent with broader city-building and sustainability goals.

However, while the intent of these initiatives is fully understood and appreciated, practical challenges arise in the absence of complementary incentives or regulatory offsets, particularly at a time when development costs are escalating across all components of project delivery. If the City seeks increased mature tree preservation and the planting of more robust tree stock, it would be beneficial to accompany these expectations with corresponding flexibility within the built form to help maintain overall project viability.

Several of the proposed zoning-related amendments may also pose challenges for infill development. Toronto is a dense, complex urban environment, and certain prescriptive measures, such as detailed classifications of "permeable surfaces" may prove difficult to apply consistently across constrained sites. While the rationale for such requirements is understood, their practical impact on development feasibility should also be carefully considered, especially where the relationship between specific surface treatments and long-term tree health may not be clearly established.

More broadly, builders consistently make genuine efforts to meet the City's expectations for tree protection and planting. Nevertheless, in practice, many mid-rise projects, particularly along Avenues, encounter significant obstacles in achieving the required soil volumes due to utility conflicts, limited site depth, and other physical constraints inherent to these locations. In numerous cases, compliance can only be attained through the installation of soil cell systems, which represent a substantial cost burden that is often difficult to absorb on smaller-scale developments. For this reason, any consideration of lowering the Private Tree By-law size threshold to protect more young trees would benefit from accounting for site-specific conditions.

Furthermore, it is common for such projects to involve extended negotiations with City staff to arrive at reasonable, context-sensitive solutions. These processes require considerable time and resources

from both staff and applicants, and the frequency with which compromises are sought suggests that the current standards may not fully reflect the realities of typical infill and mid-rise sites. This appears to be an area warranting further review, and we believe it may be beneficial for the city to examine how these requirements could be better aligned with the development contexts in which they are most frequently applied.

These considerations also intersect with the City's pressing housing objectives. Toronto is working to increase housing supply and improve affordability, and it is important that new regulatory measures - however well-intentioned - are paired with provisions that help maintain development feasibility. For example, allowing multiplexes an additional storey of height, enabling greater flexibility for setbacks, or revisiting certain built-form configuration requirements could support both the retention of mature trees and the planting of substantial new trees. Such adjustments would also help advance the City's housing goals without compromising environmental performance.

Similarly, the use of high-quality exterior materials critical to sustainability, durability, and long-term neighbourhood character may be more consistently achievable if modest, performance-based incentives (such as limited height or density relief) were made available to offset the associated costs.

In summary, if the City seeks to encourage the preservation of mature trees, promote high-quality tree planting, and achieve strong built-form outcomes, the policy framework surrounding PH26.2 may benefit from the inclusion of additional tools that support practical implementation and economic feasibility. A balanced approach - one that recognizes both environmental priorities and the operational realities of infill development will help ensure that these objectives can be effectively realized.

Thank you for your consideration of these comments and for your ongoing leadership on these matters. We would welcome the opportunity to discuss these recommendations further at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Danielle Binder'.

Danielle Binder
Vice President, BILD

A handwritten signature in blue ink, appearing to read 'Leona Savoie'.

Leona Savoie
Chair, GR Committee, NAIOP Greater Toronto Chapter