



December 2, 2025

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2PHC
Attention: Nancy Martins

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 Gord Perks, and Members of Planning and Housing Committee,

The Federation of North Toronto Residents Associations represents over 35 residents associations in North Toronto and North York, and works to bring forward a coordinated and informed perspective on the City's land use and transportation issues affecting the neighbourhoods and the City. The residents' associations that make up FoNTRA believe that Toronto can and should achieve better development.

We strongly support the Growing Space for Trees concept and the proposed policy direction intended to (a) protect and enhance the tree canopy while supporting Infill Housing and (b) address concerns with Iceberg Homes.

A. Recommended Official Plan Amendments (Neighbourhoods and Apartment Neighbourhoods) (page 10 of 23)

We support the changes to the OP which strengthen the scope and depth of protection of the tree canopy.

B. Recommended Zoning Bylaw Amendments (page 11-12 of 23)

We support the changes to the City-wide Zoning Bylaw which reinforce and clarify the intent of soft landscaping and address issues associated with Iceberg Basements. The report recommends requiring building setbacks below ground for all low-rise residential buildings (i.e. except apartment buildings) to apply below ground consistent with above ground minimum setbacks in the Residential Zone category.

C. Enhancing Existing Tree Bylaws (page 13 of 23)

We share the continuing concern and frustration of residents noted in the report regarding lack of compliance with, and enforcement of, existing policies and tree bylaws. We are aware of recent instances of flagrant “gaming” of the system, for example, at 712 Eglinton East, where the Committee of Adjustment approved moving the multiplex building forward on the lot, in order to protect the honey locust tree; the developer illegally culled the tree, and afterwards applied for a garden suite in the space freed up by the moving forward of the building!! However, we note that a major impediment to control of the “gaming” of the system is the City’s inability to link tree bylaw and planning bylaw infractions, thanks to the Provincial rulings on “applicable law”. Nevertheless, remedies are needed in cases of applications on properties where trees have been destroyed, and ravines encroached on, prior to applying for approvals. We look forward to reviewing the proposed amendments to the tree bylaws.

Finally, we note the link between Agenda items PH26.2 and 26.4 (HAP – Avenues): and the importance of wider sidewalks to accommodate the increased density, and street trees to reduce the increased carbon footprint and ensure a pleasant vibrant streetscape. The Avenue setback requirements (above and below ground) need to be reconsidered. We request that this zoning measure be re-visited to ensure sufficient space for both sidewalks and street trees.

Yours truly,

Geoff Kettel

Geoff Kettel
Co-Chair, FoNTRA

Cc: Jason Thorne, Chief Planner and Executive Director, City Planning
Valesa Faria, Executive Director, Development Review
James Nowlan, Executive Director, Environment, Climate and Forestry
Liora Zion Burton, Planner, Strategic Initiatives, Policy and Analysis, City Planning,
Trevor Swann, Planner, Policy and Research (Zoning), City Planning,
Nicholas Trevisan, Manager, Tree Protection Strategic Projects, Environment, Climate and Forestry.

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.