

January 21, 2026

Hello Mayor and PHC Committee Members,

On behalf of concerned residents across our city, I am writing to express opposition to the proposed use of “**Permeable Pavement**” under **PH27.1 - Growing Space for Trees**: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes

Scarborough United Neighbourhoods (SUN) is supportive of the recommendations of Urban Forestry. We believe that week-end enforcement of the tree by-law is needed; Urban Forestry needs to report to City Council about the number of by-law protected trees that are illegally removed and the number of permits issued to remove mature trees. In addition, Urban Forestry needs a Increased Budget to provide these services.

SUN is concerned about this motion for a long number of reasons, including:

- Multiplexes were already approved by City Council. **Time is required for the evaluation of their impacts** on mature trees and flooding impacts due to a reduction of permeable land;
- The Chief Planner and Executive Director, City Planning does not have the expertise or **data** to evaluate the impacts of permeable paving on mature trees situated on infill sites;
- **Evaluating impact** of permeable paving on by-law protected trees is the purview of Urban Forestry - not planners or developers;
- Permeable paving works only when new trees and the base for the paving and the paving are installed at the same time. When paving is expanded and installed around mature trees, the damage is instantly irreversible;
- **Permeable paving requires an extensive gravel base/drainage layer(s)/system** for structural support and to facilitate infiltration below the surface, especially if the end purpose is parking. In most cases, this excavation will harm or kill existing trees. The damage to trees due to this installation does not reveal itself immediately, but over time (between 1-5 years);
- Installation is designed according to **soil conditions and permeability sampling**. The less permeable the soil, the greater the need for deeper excavation, deeper gravel and a larger infiltration medium;
- There are different requirements for areas where there are **frost influences**. If the ground is frozen, the system does not work - Or is less effective, during the winter months.
- Over the course of time, systems will lose their efficiency as **contaminants/particulates** enter the system. This will affect the rate of efficiency from the surface entry points and the rate of infiltration, below grade.
- The areas where water passes from the grade to below grade need to be kept clean of **debris and sediments**. If a regiment of maintenance is not upheld on a regular basis, the system cannot be regarded as a long-term viable solution to surface water management.

- These systems require **system maintenance** to keep them 100 % efficient. Over the course of time (2-5 years) these drainage systems and water collection and infiltration systems will become redundant and ineffective.
- These systems will have limitations in efficiency and water management capacity. **Soil permeability** will also be a large determinant on effective drainage capacity. Precipitation volume, rate of infiltration, existing capacity will all be very unpredictable and thus, these systems cannot be relied on outside of balancing green space with developed space.
- The most effective solution to managing surface water runoff, mitigation of flooding and reduction of burden to the City Storm water management system, is to maintain a very **healthy balance of developed space, to permeable and healthy green space**. Green space includes substantial space for a healthy tree canopy, comprised of long term and viable growth medium.
- **Site restoration** is also a critical need to manage surface water runoff. Post construction site restoration is not required, but is a key element in the restoration of permeable space and green space. Soil compaction due to construction activity affects tree canopy preservation and future growth potential for green space installed at post construction.
- **Balance** of green space and developed space is critical to ensuring long term viability of surface water management. All the tools to manage stormwater runoff should be utilized to maximize the potential to reduce runoff and reduce the burden to City systems and to adjoining properties. A healthy balance of subgrade drainage, green space, tree canopy, and reduction of over development will facilitate a better outcome for all.

To summarize, we can agree that Parking is the issue BUT having **Permeable Paving is NOT the Solution and should NOT be a Substitute for True Soft Landscaping..**

Sincerely,

If WE Don't Speak Up Now, WE Won't Be Heard...

SCARBOROUGH CARES!

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NOTE: The SUN is non-partisan to the information provided which is for community awareness & discussion purposes only.

Cc: Jason Thorne, Chief Planner and Executive Director, City Planning
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