

PH27.1 - Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes - Recommendation Report, Lenka Holubec, Protect NatureTO

Jan 22, 2026

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RE: PH27.1 - Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes – Recommendation

Dear Chair, Vice Chair and Committee Members,

This is to strongly support:

“The Chief Planner and Executive Director, City Planning and Executive Director, Environment, Climate and Forestry recommend that:

1. City Council adopt the Official Plan Amendment 857 in accordance with Attachment 1.

and

2. City Council adopt the Zoning By-law Amendment in accordance with Attachment 3”

“Toronto's trees are essential in addressing biodiversity loss, mitigating the impacts of climate change, and contributing to the development of attractive, livable and healthy neighbourhoods.”

“New infill housing is needed to help address Toronto's housing crisis.”

There is another acute crisis in Toronto, connected to mental health of Torontians.

‘This is unprecedented’: New report card shows Toronto’s mental health is collapsing “At a closer glance, 55 per cent of respondents said the pandemic had a moderate to extreme negative impact on their mental

health. Meanwhile, nearly half (46 per cent) said they feel depressed about the future because of climate change.”

The authors of this Report think the findings should become a central issue in the 2026 municipal election.

Our current perception of what is urgent maybe hijacked by a notion of “housing crisis” repeated ad nausea by developers and politicians behind never-ending growth.

In reality, there is homelessness and social crisis that needs our attention. The “infill” may address the governments projected future growth, but only major changes focusing on combating growing social crisis and economy adopting ecological limits may bring positive changes for majority of society, while benefitting climate and nature.

Housing Accelerator Fund makes the pressures on city to build more housing, but will hardly mitigate climate change, biodiversity loss or poverty.

In the meantime, let's please adopt protecting and enhancing the city's tree canopy while addressing the impacts on the tree canopy and water management associated with iceberg homes, address landscaping and setback regulations, including requirements that apply minimum building setbacks below ground (consistent with existing setbacks above ground) for all low-rise residential buildings (e.g. detached houses, semi-detached houses, townhouses, and multiplexes), and promote soft landscaping to encourage more proper infiltration to stay away from “*the Noir City*” for the sake of climate, nature, future and all of us.

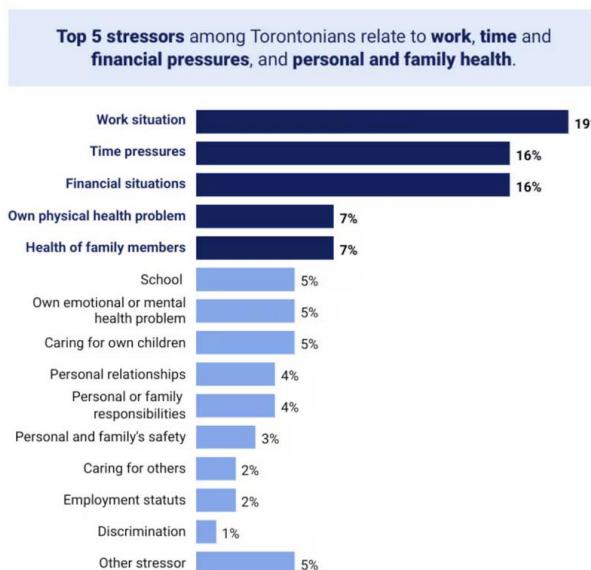
Yours sincerely,

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A chart from ThriveTO's latest report on the state of mental health in Toronto (ThriveTO photo)



Deriving the Ecological Footprint and Biocapacity of Ontario Cities and Rural Areas

Authors: Peri Dworatzek, Eric Miller, and Danielle Letang

Publication: Journal of City Climate Policy and Economy Volume 4, Number 2

<https://doi.org/10.3138/jccpe-2024-0058>

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“Ontario’s current growth plan envisions millions of additional resident consumers in Southern Ontario, without any apparent consideration to whether the greenbelt ought to grow to sustain the level of consumption supported by the greenbelt. If the area of the greenbelt does not grow, to what extent could its land use and land cover change to affect its capacity to support ecological footprint?

Local and global commitments to achieve net zero emissions are anticipated to affect the demand for specific land uses and land covers, which could further affect questions about the size and composition of the greenbelt, and other lands in Ontario.

Getting to net zero emissions could involve some substitutions of fossil fuels with biofuels, likely from agricultural lands. **At the same time, demands for carbon sequestration could increase the demand for afforestation on lands that would otherwise be used for crops or pastures. The greater use of renewable materials such as timber, as a substitute for non-renewable materials such as concrete, steel, and aluminum, could increase demand for harvesting forests rather than conserving them as carbon sinks.**

These are just a few examples that relate questions about opportunities, limits, and trade-offs of land use and land cover to the pursuit of net zero emissions.

Quantifying biocapacity as a natural asset without monetary metrics

Cities in Ontario and beyond are increasingly interested in quantifying natural assets, such as parkland, wetlands, urban forests, street trees, and aquifers. Several cities in Ontario and other Canadian provinces have participated in a Municipal Natural Assets Initiative (MNAI) aiming to mainstream and standardize the accounting of natural assets as aspects of municipal balance sheets and public sector accounting practices (MNAI, 2021). **With natural assets included in conventional accounts of (non-natural) assets, proponents believe that cities would be more attentive to the conservation and use of natural assets rather than their substitution. For example, urban greenspaces ought to be recognized beyond their role as parks and trails for sports and recreation. Urban greenspaces ought to be considered an asset that can provide services of air purification, noise attenuation, temperature moderation, and stormwater retention.”**

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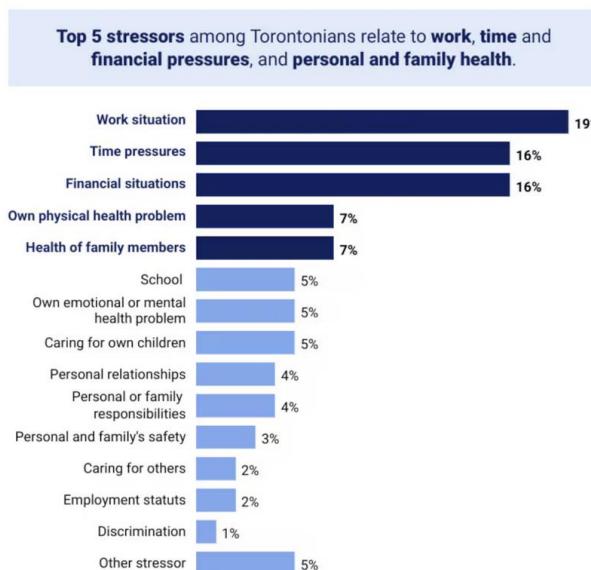
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