



Planning and Housing Committee

January 21, 2026

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

Dear Chair Councillor Gord Perks and Members of the Planning and Housing Committee,

This letter provides additional information to our previous letter of December 2, 2025, on this topic based on the Supplementary Report – Growing Space for trees and Minor Variance Requests for Soft Landscaping for Multiplexes.

We reviewed recent Multiplex variance applications in Long Branch to determine how much soft landscaping is lost when properties are being converted into Multiplexes. Our findings were that in the case of Minor Variance applications:

- Multiplexes in Long Branch did not use the existing footprint of the existing structure to convert properties into multiplexes.
- Due to the demolition of the existing dwellings and the proposed construction of much larger multiplexes, there was a significant reduction in soft landscaping and growing space for trees.
- This ranged from 23% of soft landscaping lost to as high as 72% lost soft landscaping. This loss of growing space for trees and other vegetation is very concerning as trees are needed to help absorb stormwater, reduce the urban heat island effect and provide refuge, habitat and foraging areas for birds, small mammals, insects and provide health benefits to residents.

We therefore strongly support the recommendations in the original Report dated November 18, 2025, to strengthen tree protection to support the City's resilience to the impacts of climate change. In particular

- The recommended policy changes to Chapter 4 of the Official plan Policy 4.1.5 j); 4.1.9 g); 4.2.2 i) and j); 4.2.3 e); 4.2.4 b) v and vii and 4.2.6
- As shown by our case studies, artificial turf and permeable pavements and pavers should not be considered as "soft landscaping", including not for multiplexes to provide parking as substantial growing space for trees is already being lost with multiplex applications in Long Branch. Allowing this would not achieve the objectives of providing growing space for trees.
- Substantially more growing space for trees would be forever lost if the remaining dramatically reduced soft landscaping were even further reduced if permeable pavers for parking were counted as "soft landscaping" for multiplexes. We strongly object to this.
- We agree that the area of soft landscaping should not include water surface area of outdoor swimming pools, hot tubs, fountains or other ancillary structures used to hold water.
- We agree that the required building setbacks need to apply to all parts of a residential building above and below ground to prevent "iceberg houses"

However, for trees to grow and thrive around apartment buildings we believe that below and above ground setbacks should also apply to apartment buildings.

We would like to see greater clarification on what is classified as an artificial pond as it would need to have the majority of surface area as plants to meet the intent of these policies.

We would strongly recommend building in requirements for minimum areas, soil depths and volumes to support the growth and maintenance of large canopy trees to maturity. If this is not done, we risk becoming a city of only small, short-lived trees.

To ensure that Toronto achieves its biodiversity goals we would also recommend stronger policies around providing space and sunlight, soft landscaping and soil volume that can support large canopy native tree growth. Too many trees are being placed in the shadow of tall buildings for much of the day and this drastically limits the size and species of trees that can survive in those adverse conditions.

Sincerely,



Judy Gibson

Chair, Tree Canopy Preservation and Enhancement Committee
Long Branch Neighbourhood Association

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Figure 1: Two “twin” mature, healthy city-owned trees in 2015. Note the growing space and amount of soft landscaping around the tree to the right prior to intensification.



Figure 2: Same two city-owned trees in summer 2023 approx. three years post intensification. Note the lack of growing space and lack of green space/soft landscaping around the tree to the right. Has resulted in a dramatic decline in tree health.

