



Dear Planning & Housing Committee,

Re: 2026.PH27.1 - Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes - Recommendation Report

The South Etobicoke Community Land Trust welcomes staff's supplementary report regarding minor variance requests for permeable pavers associated with multiplexes, in addition to the primary report. Building more affordable housing and preserving or expanding tree canopy are not acts which are anathema to one another; and we believe both are mutually achievable.

As various parts of our study area lie more than 800 meters from public and regional transit stops, the SECLT is actively considering housing designs, which assure both increased housing supply and retained parking for such properties, as part of our portfolio. As such, we support counting permeable pavers, used in the context of parking spaces, as part of the variety of permitted soft landscaping tools; as with any other such tool, they should not comprise the entire requirement.

According to the staff report, 22 multiplex applications since May 2023 and up to November 2024 included permeable pavement on application plans. 21 of these were subsequently approved with a condition requiring permeable pavers or with the provision of permeable pavers being a significant motivator. If City of Toronto Committees of Adjustment already approve minor variance applications which request permeable pavers as soft landscaping, as regular practice; why not simply permit permeable pavement for use with parking spaces as-of right? This is important in light of the fast-tracked provincial removal of green roofs and other sustainability infrastructure tied to housing as mandated components of development applications when Bill 60 was recently considered.

South Etobicoke Community Land Trust
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Regarding tree canopy, several multiplex applications have been refused or deferred at Etobicoke-York Committee of Adjustment within the last year, on account of encroachment, supposed or actual, on tree canopy by requested setback variances. To mitigate these impacts, we would like to request exemptions from the height and storey overlays as a permitted minor variance, in order to secure tree canopy protection when building multi-unit housing. This move would increase housing choice and mitigate drainage and flooding impacts otherwise derived from increasing a structure's lot coverage or from building finished basements. In particular, this language should be included in the proposed Zoning By-Law Amendment to match the proposed Policy 4.1.14 in Official Plan Amendment 857. The City of Toronto's 2018 Tree Canopy Study pre-dates garden suite, laneway suite and city-wide multiplex permissions; any observed residential tree canopy loss would have come from single-detached homes or townhouses, both of which tend to be single-unit built forms; with multiplexes having created little such loss.

The Zoning By-Law Amendment regarding below-ground setback encroachments (iceberg homes) should be restored to its original proposed language and solely regulate single-detached homes.

We support increased enforcement of existing tree by-laws, but this also needs to be coupled with providing in-kind funds to plant trees off-site like currently exist for parkland, more active engagement from Urban Forestry with minor variance applications in drafting and successive stages as well as permitting tree removal with transparent replanting guidelines; particularly for invasive tree species. The current regime is inflexible, with little feedback given until things have already gone wrong. We hope the Committee considers these reforms.

Sincerely,
Thaddeus W. Sherlock
Board of Directors, South Etobicoke Community Land Trust