



January 20, 2026

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

**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 Gord Perks and Members of Planning and Housing Committee,

This is to advise of our strong support for the staff recommendations in the Recommendation Report (dated November 18, 2025), including the definition of soft landscaping, and the recommended Policy changes to Chapter 4 of the Official Plan that will strengthen tree protection and their growing space.

The above noted staff report recommends updating the definition of "soft landscaping" in the Zoning By-laws to state that it **DOES NOT** include artificial turf or permeable pavement. Soft landscaping provides growing space for trees and other vegetation, helps to absorb stormwater, reduces the urban heat island effect and provides refuge, habitat and foraging areas for birds, small mammals, and insects and provides health benefits to residents.

The Supplementary Report "Growing Space for Trees and Minor Variance Requests for Soft Landscaping for Multiplexes", dated January 6, 2026, indicates that while permeable pavement may be better than asphalt driveways when it comes to allowing some water to percolate through, it is not even close to being comparable, and should NOT be a substitute for true soft landscaping.

In addition, we would reiterate the comments and recommendations included in our previous submission on this matter to PHC in December, 2025<sup>1</sup> (deferred to January 2026), including:

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<sup>1</sup> (December 2, 2025) Letter from Geoff Kettel, Co-Chair, Federation of North Toronto Residents Associations (PH.Main)

- Supporting the staff recommendation to require 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
- Expressing FoNTRA's concerns regarding the lack of compliance with, and enforcement of, existing urban forestry policies and tree bylaws
- Raising for consideration an additional issue regarding the need for coordination with the Avenues policy, including 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.

Respectfully submitted,

*Geoff Kettel*

Geoff Kettel  
Co-Chair

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 35 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.