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**Planning and Housing Committee**

City of Toronto  
100 Queen St W  
Toronto, ON

June 11, 2025

**RE: PH22.5 - Housing Accelerator Fund: Apartment Infill Study - Residential Infill Report**

Dear Planning and Housing Committee Members,

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions in the Greater Toronto and Hamilton Area. Thank you for the opportunity to provide feedback on the City's Apartment Infill Study. We are encouraged to see that staff recommendations include explicit permissions for overcladding in Residential Apartment zones. This amendment is crucial for enabling deep energy retrofits and advancing the City's climate goals and is in alignment with the City's Net Zero Existing Building Strategy.

The proposed permission allows new cladding to be added to the original exterior of a building, and an encroachment of up to 0.9 m into setbacks/separation distances, inclusive of associated ventilation, pipes, or utility equipment. This allowance will enable the use of a majority of cladding systems. The amendments will also streamline approval processes, as it removes the need for individual variance applications for overcladding. By eliminating this barrier, this amendment will support substantial energy performance improvements in the City's existing, aging buildings.

Furthermore, given the high embodied carbon in concrete buildings, retrofitting preserves existing affordable housing stock more sustainably and cost-effectively than demolition and replacement and helps minimize tenant displacement.

We urge council to approve this amendment to the City's Zoning By-law and look forward to continuing to support the City with achieving its climate and housing goals.

Sincerely yours,



Bryan Purcell  
VP Policy & Programs, The Atmospheric Fund

**About The Atmospheric Fund**

*The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. We are experienced leaders and collaborate with stakeholders in the private, public, and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies, and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.*