



## Committee of the Whole

February 10, 2026

City of Burlington  
426 Brant St  
Burlington, ON  
L7R 3Z6

### RE: 13.1 New Residential Zoning Bylaw (DGM-05-26)

Dear Committee Members,

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions in the Greater Toronto and Hamilton Area. We are providing feedback on the City's proposed new Residential Zoning Bylaw. TAF applauds Burlington's work to streamline the Residential Zoning Bylaw, making it more accessible and easier to interpret. We particularly support the modernization of the bylaw through the introduction of new technologies, including heat pumps and renewable energy systems, into the Bylaw's definitions, which provides greater clarity and reflects current building and energy technologies. TAF would like to offer the following recommendations for the City's consideration:

- **Mechanical Equipment including Rooftop Mechanicals**

TAF supports the proposed ground-level setbacks for unitary mechanical equipment, including heat pumps. However, the proposed rooftop provisions for mechanical equipment are overly restrictive and risk minimizing opportunities for low-carbon retrofits and rooftop energy systems. On many residential buildings, a five metre setback from all building edges effectively eliminates most of the usable roof area, leaving little or no space to install heat pumps or rooftop solar at all. **TAF recommends replacing the five metre rooftop setback with a more permissive standard for heat pumps and rooftop solar**. The City is currently proposing a reduced 1.5 metre setback for enclosed rooftop mechanical equipment, and TAF recommends extending a similar approach to heat pumps and solar installations.

- **Electric Vehicle (EV) Parking Requirements for Multi-Unit Residential Buildings (MURBs)**

We note that the proposed zoning bylaw introduces a minimum EV parking requirement for MURBs containing 11 dwelling units or more. However, this is limited to a single parking space equipped with Level 2 charging. As currently drafted, this minimum does not scale with the building size and may not adequately support growing EV adoption among residents in larger developments in line with current adoption trends and future demand.

An [earlier draft](#) of the proposed Residential Zoning Bylaw included more robust, scalable EV parking requirements. These were removed in response to development industry feedback citing feasibility concerns and a preference for allowing the market demand to determine the amount and type of parking provided. While we agree with the underlying rationale to allow market demand to dictate parking available in new developments, we recommend removing parking minimums entirely, municipality wide. **Where parking infrastructure is provided in MURBs, we recommend mandating that 100% of parking spaces be EV-ready** to avoid significant future retrofit costs and to support long-term electrification. This approach aligns with The EV-ready parking requirements Burlington is currently assessing under the

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[Community Planning Permit By-Law](#) for new development in Major Transit Station Areas, which proposes that where buildings contain four or more dwelling units, 20% of parking spaces be equipped as EV parking spaces and the remaining 80% be provided as designed EV-ready spaces. This approach is prudent as retrofitting existing parking spots to be EV-ready can be [three to four times more expensive](#) than ensuring spaces are EV-ready at the time of construction.

- **Exterior Recladding and Insulation**

The proposed new Residential Zoning Bylaw **permits exterior recladding to project a maximum of 0.05 metres** from the wall of an existing building. **We recommend increasing the permitted projection for exterior insulation and recladding to 0.15 metres and exempting this additional projection from gross floor area.** This approach is consistent with changes recently made by the City of Toronto to better accommodate common energy retrofit measures, including the addition of exterior insulation required for high-performance building envelopes, supporting building decarbonization and climate resilience. The [City of Toronto has recently](#) taken a more permissive approach by allowing exterior cladding to encroach into required setbacks for existing residential buildings, recognizing that deeper retrofit measures can be accommodated without adverse impacts.

Thank you for the opportunity to provide this feedback. We applaud the City's ongoing efforts to simplify zoning rules and advance climate action across Burlington.

Sincerely,

Bryan Purcell



VP of 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. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. 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.

