

November 22, 2025

Minister Rob Flack  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 14<sup>th</sup> Floor  
Toronto, ON M7A 2J3

***Re: OPPI Feedback on ERO 025-1100: Consultation on Minimum Lot Sizes***

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of Municipal Affairs and Housing (MMAH)'s request for comments on minimum lot sizes to better understand their linkage with increased housing options and affordability.

OPPI is the recognized voice of Ontario's planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, developers, municipal governments and within the Ontario Public Service, other community agencies and academic institutions. They work across a geographically diverse cross-section of Ontario—in communities ranging in size from small to large. Within the planning world, housing remains one of the largest priorities for the profession.

OPPI therefore appreciates the government's overarching objective of streamlining the construction of new homes and encouraging a greater range of housing options. We believe that developing a clearer understanding of the relationship between minimum lot sizes, housing options, and affordability will be valuable in enabling a variety of homes and tenures to be built more efficiently. However, we note there are several technical considerations that may affect the implementation of this policy, which OPPI offers for the Ministry's consideration below.

1. Explore key technical considerations that planners and related professionals will need to address as the policy is finalized. These may include:
  - a. How the policy will apply to irregularly shaped lots, including issues related to frontage and right-of-way access. This should also ensure properties remain wide enough to accommodate on-site parking (driveway) and on-street parking (even with an attached driveway), snow storage, and soft-landscaping to manage drainage impacts.
  - b. How the policy will function in areas that rely on private wells or septic systems.
  - c. The impact of smaller lot sizes on the properties ability to accommodate as-of-right additional residential units.
  - d. Whether the creation of multiple smaller lots today could make future lot assembly or intensification more difficult.

- e. How lot size interacts with other regulatory tools such as floor space index (FSI) and setbacks. These relationships are important in practice. For example, if the Ministry establishes a minimum lot size of 1,500 sq. ft and the prevailing FSI is 0.3, the result would be a maximum building footprint of 450 sq. ft—an impractical size for many development scenarios.
- f. Although the Zoning By-law sets minimum lot size requirements, determining the smallest possible lot size requires consideration of other provincial legislation (e.g. Building and Fire Codes). For example, a smaller lot size may result in increased building costs related to fire separation requirements.

OPPI appreciates the work the Ministry is undertaking to better understand the effects of minimum lot sizes on housing affordability and availability and we would be most grateful to support your work in this area if requested. If you have any follow-up questions or would like to schedule a meeting to learn more about how we could support this initiative, please contact us at (416)-483-1873 x2313 or by email at [s.wiggins@ontarioplanners.ca](mailto:s.wiggins@ontarioplanners.ca).

Thank you for the opportunity to provide input on ERO 025-1100.

Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.  
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC  
Executive Director, OPPI