

Thursday, May 14, 2026

Minister Rob Flack
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Dear Minister Flack,

Re: OPPI Feedback on ERO 026-0311: Proposed Regulatory Approach to Establish a Minimum Residential Lot Size in Urban Areas

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on your Ministry's proposed regulatory approach to establishing a minimum residential lot size in urban areas.

We appreciate the Province's efforts to increase housing supply and improve affordability through proposed changes to minimum lot size requirements. In principle, enabling smaller lots can support a broader range of housing options and more efficient use of land. However, the success of this approach will depend on how these permissions operate in practice, particularly with respect to site functionality, built form, and alignment with other regulatory requirements.

A key consideration is the need to balance reduced lot sizes with appropriate controls on lot coverage. Without such measures, there is a risk that development will maximize building footprint to the greatest extent possible, potentially contributing to increased housing costs and limiting the ability of a site to accommodate essential functions. These include snow storage, drainage, and soft landscaping. In particular, an increase in impermeable surfaces may negatively impact stormwater infiltration, resulting in greater runoff and placing added pressure on municipal infrastructure systems.

The proposed minimum lot size of 175 square metres (1,884 square feet) may be reasonable and workable if applied to ground-oriented housing forms such as single detached, semi-detached, and street townhouse dwellings. At the same time, consideration should be given to how lots of this size will accommodate additional residential units as-of-right. Smaller lots may limit the ability to incorporate these units in a functional and compliant manner, which could constrain the broader objective of enabling gentle intensification.

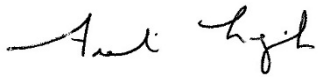
There are also practical challenges associated with applying a uniform minimum lot size to a wide range of lot configurations. Irregularly shaped lots, in particular, may present difficulties related to frontage, access, and overall site design. It will be important to ensure that lots remain sufficiently wide to accommodate driveways, on-site parking, and on-street parking, even where a driveway is present. In addition, smaller lots must continue to support accessible access to residential dwellings, including the space required for appropriate front and side yard setbacks.

The relationship between minimum lot size and other regulatory tools, such as floor space index and setback requirements is another important consideration. These elements work together to shape the ultimate built form, and if not carefully aligned, may result in building envelopes that are impractical for many development scenarios. Ensuring that these provisions function cohesively will be critical to achieving the intended outcomes of the proposal.

Finally, while zoning by-laws establish minimum lot size requirements, the smallest feasible lot size in practice is also influenced by other applicable legislation, including the Ontario Building Code and the Ontario Fire Code. Requirements related to fire separation, for example, may increase construction costs or limit building configurations on smaller lots. A coordinated approach across these regulatory frameworks would be necessary to make certain that the proposed changes are both practical and effective in delivering the intended housing outcomes.

Thank you for the opportunity to provide feedback on ERO 026-0311. We would be pleased to meet with you to discuss our recommendations. If you have any questions or would like to schedule a meeting, please do not hesitate to contact us at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



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



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