

City Planning

City Hall
100 Queen Street West
12th Floor, East Tower
Toronto, Ontario M5H 2N2

Tel: 416 392-8772
Jason.Thorne@toronto.ca
www.toronto.ca/planning

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Provincial Planning Branch
777 Bay Street, 13th Floor
Toronto, ON M5G 2E5
PlanningConsultation@ontario.ca

RE: Consultation on Minimum Lot Sizes (ERO 025-1100)

On behalf of the City of Toronto, I am pleased to submit the City Planning Division's comments on the consultation on minimum lot sizes.

City Planning staff understand that government is seeking public feedback on proposed legislative and regulatory changes under the Fighting Delays, *Building Faster Act, 2025* to streamline the construction of new homes and infrastructure (e.g., water, wastewater, roads, transit), reduce gridlock, enhance community safety, and improve landlord-tenant frameworks. In addition, staff understand that in connection with this Bill, the government is consulting to better understand the linkages between setting minimum lot size requirements on urban residential lands and increased housing options, improved affordability, and expanded access to homeownership across Ontario.

The City of Toronto supports the general intent of the Province to encourage gentle density, increase housing supply, broaden housing options and encourage home ownership to contribute to meeting the Province's goal of building 1.5 million homes. However, the proposal to reduce or remove minimum lot size requirements in low-density urban residential areas may have the unintentional effect of frustrating future intensification, by enabling the severance of large lots into multiple small lots that are only able to accommodate a small, single-unit house. While a severance may allow an individual builder, in the short term, to construct a small single-family home, reduced lot sizes in the longer term may create a barrier to more significant intensification, such as multiplexes and small-scale apartment buildings. This intensification is supported through many of the City's recent Official Plan and Zoning By-law updates.

Toronto's recent multiplex permissions, in combination with ARU permissions, permit up to 5 units on most residential lots across the City, and up to 7 units on lots in the downtown area. From the perspective of planning for intensification through missing middle housing

types, it is preferable to retain larger parcels that are capable of more easily accommodating multi-unit residential development in the form of multiplexes and small apartment buildings.

Larger parcels make it easier for property owners to take advantage of Toronto's permissive new zoning to build multiple units in the form of a multiplex. For example, many of the multiplex designs in CMHC's National Housing Catalogue will not fit on a lot less than 10 metres in width. These building types have much greater potential to deliver residential units than single-unit houses. Similarly, as-of-right zoning permissions in Toronto for small apartment buildings on the city's major streets are generally premised on assembling two 12-metre-wide lots that are typical in many of Toronto's suburban neighbourhoods. If the Province does choose to impose minimum lot size requirements, they should be sufficient to accommodate these types of intensification, otherwise a provincial regulatory framework that enables severances may reduce land readily available for multi-unit residential development.

Toronto's experience has particularly highlighted the importance of adequate lot frontage to accommodating upgraded utility infrastructure required for multi-unit buildings, such as hydro transformers, and to providing for emergency access to garden suites and other units through side yards.

If the Province's objective is to create more ownership opportunities in the form of small, relatively affordable homes, then it could consider ways to leverage Toronto's and Ontario's growing stock of multiplex buildings to achieve more home ownership opportunities. This likely requires an alternative approach to condominium registration as a means to establish ownership tenure. Condominium corporations require cost and effort to register and operate, which may exceed the means of a multiplex building or other small apartment building. Provincial legislation may be needed to establish an ownership tenure model that is simpler to establish and operate.

The City recently monitored take-up of the multiplex zoning permissions adopted by Council in 2023. The study identified the condominium approval process and associated costs, and the challenges of operating a condominium corporation, as a barrier to small-scale condominium projects. Feedback from the public has suggested a need for template legal agreements and other documents to reduce costs and complexity in the condominium process for small scale housing types, including multiplexes, small apartments and garden and laneway suites. A common comment is that Ontario should look at the British Columbia model of strata property.

Conclusion

Reducing or removing minimum lot size may discourage intensification over the long term and frustrate the delivery of gentle density. More impactful solutions to increase housing options, improve affordability, and expand access to homeownership across Ontario may

include changes to legislation to enable strata for small-scale residential development. Several factors outside of minimum lot sizes also influence the implementation and uptake of gentle density, increased housing supply and home ownership including interest rates, ability to obtain financing, cost of materials and labour, and Condominium Act barriers.

Staff recommend providing a longer commenting period on any proposed regulation, and that the Province undertake analysis of the implications of any changes on facilitating more significant intensification in residential areas through building forms such as multiplexes and small-scale apartments.

Should you have any question regarding the City's submission or would like to arrange a meeting with City Staff, please contact me directly or Caroline Samuel, Manager, Zoning Section, City Planning Division (Caroline.Samuel@toronto.ca; 416-392-8781).

Sincerely,



Jason Thorne, MCIP, RPP
Chief Planner and Executive Director
City Planning