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November 22, 2025

Province of Ontario – Ministry of Municipal Affairs and Housing

**Re: Consultation on Minimum Lot Sizes**

Thank you for the opportunity to review and comment on the Environmental Registry of Ontario (ERO) posting 025-1100. It is understood that the government is seeking public feedback on proposed legislative and regulatory changes under the *Fighting Delays, Building Faster Act, 2025* and in connection with the Bill the government wants 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 Simcoe County District School Board (SCDSB) is supportive and understands the critical need for additional residential housing forms; however, planning staff wish to highlight the impact of infill and intensification such as may occur if minimum lot sizes are reduced or eliminated on the board's ability to provide elementary and secondary pupil accommodation. As a legislated commenting agency as well as an active participant in the development process in 16 lower-tier municipalities and two (2) separated cities, the SCDSB has a unique perspective on the proposed changes. The intent of this letter is to outline and provide feedback as it pertains to how reducing or eliminating minimum lot sizes may impact the board in providing required elementary and secondary pupil accommodation. Comments are provided in the following table:

General SCDSB Comments
<p>Infill development and intensification within existing settlement areas that may occur as the result of the reduction or removal of minimum lot size requirements may increase student enrolment in existing local schools and impact school boards' ability to provide required pupil accommodation given existing site limitations (such as required parking, setbacks, site topography, etc.). School boards will require support from the province and local municipalities to ensure that board needs are addressed to ensure that accommodation can be provided in a timely manner. This could include partnerships related to shared parking or off-site parking permissions, innovative school site designs such as sites with no on-site kiss and ride facilities, faster processing of portable classroom permits, and other school-supportive activities.</p> <p>The province could consider supporting school boards by amending Education Development Charges (EDC) legislation (e.g. O.Reg 20/98 7.(1)9. a.) to permit charging EDC rates on a per square foot basis instead of on a per dwelling unit basis for new residential development. A per square foot rate model would scale with dwelling size and may make smaller, more affordable residential units more appealing to developers. This may also lessen the EDC impact on missing-middle and attainable/affordable housing development. A per square foot EDC model would also more closely match student yield trends that are seen across Simcoe County, where low density housing tends to generate higher student yields and so ensures that growth more</p>

accurately pays for growth. A per square foot EDC model would also align with how many municipalities collect development charges, as many use a charge based on square footage.

SCDSB planning staff note that schools have experienced significant pressures to be used as urban green space as parkland dedication rates have been reduced and appropriate green space provision for residents has not kept pace. Further intensification and infill within existing neighbourhoods will only exacerbate this issue. This creates challenges for operations and maintenance staff at schools as increased informal after-school hour usage increases, but funding for operations and maintenance does not take this into account. The current parkland dedication calculation is based on the amount of land proposed for development; SCDSB planning staff respectfully posit that the parkland dedication calculation should be based on the density factor of the proposed development (i.e. density of units or people per hectare), as this would ensure that parkland is provided relative to the number of residents that will require it.

#	Consultation Questions	SCDSB Comment
1.	<p>What are your thoughts on the benefits and/or risks associated with reducing or removing minimum lot size requirements in low-density urban residential areas to encourage gentle density, increase housing supply, broaden housing options and encourage home ownership?</p>	<p>As mentioned, intensification and infill can increase enrolment in local schools, while it can be difficult for the board to increase accommodation within those schools to handle increased enrolment due to existing site limitations. Support from the province and local municipalities is required to ensure adequate student accommodation can be provided.</p> <p>SCDSB planning staff note that sometimes municipalities will impose larger setbacks on school sites to increase buffering between uses when setbacks are reduced on adjacent sites. This negatively impacts the efficient use of school sites and school site design, as well as creates uncertainty in the development process for existing school sites. The province should ensure that, should minimum lot sizes on parcels of urban residential land be reduced or removed, there is no subsequent increase to required setbacks on lands containing schools or designated and zoned to permit schools.</p> <p>Reducing or eliminating minimum lot sizes will reduce the amount of available street parking in existing residential neighbourhoods by reducing frontages on public streets. In areas with school sites, this will add complexity to school site design and vehicular access, as the SCDSB often works to disperse vehicular traffic around school sites and on surrounding streets to mitigate traffic impacts at bell times. The reduction of on-street parking is a significant concern in communities that continue to be car-dominated, which includes many communities in Simcoe County where the board operates. The province should ensure that municipalities develop walkable, complete communities with adequate, comprehensive, and coordinated transit and active transportation options, including the provision of sidewalks that are cleared of snow in the winter. This would ensure that transit and active transportation are viable alternatives to the personal motor vehicle. Where sufficient transit and active</p>

		<p>transportation cannot be provided in the short term, municipalities should consider and provide communal municipal parking lots/structures in residential areas where this makes sense, with the ability to redevelop parking into higher-productivity land uses as transit and active transportation options become available.</p> <p>SCDSB planning staff note that reducing or eliminating minimum lot sizes may increase the effects of shadowing on nearby sensitive land uses such as schools, child care, and park land. The Simcoe County District School Board continues to be highly supportive of the use of shadow studies for development projects in the vicinity of sensitive uses to ensure that shadowing impacts are mitigated and impacts to sensitive users such as children are reduced.</p>
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With the Province's stated goal to construct 1.5 million new homes by 2031 comes the need to ensure Public Service Facilities are sufficient to meet the needs of the residents of these new homes. The Simcoe County District School Board will require the support of the province and municipalities to ensure that required elementary and secondary pupil accommodation can be provided in a timely manner in the face of increased infill and intensification in existing neighbourhoods. This will facilitate growth and ensure that every student has access to quality education.

Should you require additional information, please do not hesitate to contact this office.

Sincerely,



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