



November 20, 2025

Ministry of Municipal Affairs and Housing
Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

Re: Conservation Ontario's comments on "Consultation on Minimum Lot Sizes" (ERO#025-1100) and "Consultation on Enhanced Development Standards - Lot Level (outside of buildings)" (ERO#025-1101)

Conservation Ontario is the voice of Ontario's 36 Conservation Authorities (CAs). We offer the following comments further to CA mandatory programs and services, including natural hazard management.

Conservation Ontario supports the government's commitment to exploring opportunities to increase housing options, improve affordability, and expand access to homeownership, while "protecting public health, safety and the environment".

The Ministry is seeking feedback on identifying a more permissive approach to municipal minimum lot size requirements for urban residential lands. Minimum lot size requirements may be incorporated into municipal zoning by-laws, establishing the smallest permissible size for an urban residential lot.

The Ministry is also seeking feedback on the use of enhanced development standards (e.g., "green building standards") at the lot level (outside of buildings). Municipalities may apply enhanced development standards through site plan control or other planning tools.

- As noted in ERO#025-1100, circumstances exist where minimum lot size requirements play an important role in protecting public health, safety and the environment, including where lots are constrained by natural hazards or where space is required to accommodate stormwater management infrastructure.
- Despite the focus on "urban residential lands" as defined in the *Planning Act*, such properties may still be subject to natural hazard constraints.
- To protect people and property from the impacts of natural hazards, Conservation Authorities and planning authorities collaborate to identify hazardous lands and

hazardous sites and manage development in these areas, helping to avoid or reduce impacts from natural hazards.

Conservation Ontario supports flexibility for municipalities to consider a balanced approach to stormwater management that integrates both traditional (“grey”) and green infrastructure solutions. Applying a range of solutions can support hazard mitigation to facilitate safe housing and infrastructure development.

- As Ontario seeks to increase the supply and diversity of housing, innovative construction and design approaches can help facilitate safe development and manage risks to people and property.
- Further to the Provincial Planning Statement, 2024, planning authorities are to prepare for the impacts of a changing climate through approaches that “*promote green infrastructure, low impact development, and active transportation*”.
- Applying LIDs and other green infrastructure may reduce dependence on and lower maintenance costs for larger stormwater management facilities and support a “treatment train” approach to managing stormwater infiltration and runoff.
- Should the Province proceed with reducing or removing minimum lot size requirements, enhanced development standards such as LIDs may offer a solution to manage stormwater quantity impacts for smaller, infill development sites. Maintaining green infrastructure to reduce flooding impacts is consistent with recommendations in “Ontario’s Special Advisor on Flooding Report”.
- To support a flexible and adaptive approach to stormwater management, Conservation Ontario **recommends the Province finalize the “Low Impact Development Stormwater Management Guidance Manual” (ERO#019-4971) to provide information, best practices and encourage innovative approaches to manage rainfall, reduce flooding risks, and increase climate change resiliency.**

Thank you for the opportunity to review and provide comments on “Consultation on Minimum Lot Sizes” (ERO#025-1100) and “Consultation on Enhanced Development Standards – Lot Level (outside of buildings)” (ERO#025-1101). CAs are committed to collaborating with local municipalities and the Province to advance innovative, science-based solutions to support safe, sustainable housing and infrastructure development. We would be pleased to further discuss these comments at your convenience.

Sincerely,

Nicholas Fischer

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c.c. All CA CAOs/GMs