



November 22, 2025

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

Re: Bill 60 + Various ERO Postings

Dear Minister Flack,

Please accept the below comments submitted by the Kingston Home Builders' Association (KHBA) in response to the EROs posted in accompaniment to Bill 60, the *Fighting Delays, Building Faster Act*.

The KHBA supports the government's continued efforts to support the creation of new residential housing. Provincial efforts to support residential land development by reducing delays are in alignment with the association's goal of building new communities for Kingston and area residents.

The table below responds to the questions provided through recent ERO postings released alongside Bill 60. These comments are generally intended to support the province's efforts by refining the approach being proposed in the relevant ERO postings.

ERO posting + proposed change	KHBA Comments
ERO #025-1099 Consultation on simplifying and standardizing official plans	
<ul style="list-style-type: none"> • Simplify and standardize the structure and contents of official plans across Ontario, see proposed structure and schedules listed below • What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans? 	<p>KHBA recommends against standardizing OP sections or maps.</p> <p>The KHBA instead recommends the province require that OPs highlight policies so that it is clear what is a policy that must be addressed and what text is simply discussion of intent, context or background.</p> <p>The KHBA supports the use of standardized land use designations, though it recommends targeted consultations with stakeholder organizations prior to implementation, to ensure the designations do not introduce land use conflicts. Greater residential density in rural hamlets should be permitted, and the province could also consider permitting municipalities to layer two or more designations in areas where it may be appropriate to do so based on the local context. Clarity on what constitutes low-rise/density, mid-rise/density, and high-rise/density may trigger further comments from the KHBA as these categorizations vary significantly across the province.</p>

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	<p>OP text that is not relevant to land use planning applications does not pose challenges to those planning applications. It provides an opportunity to discuss a municipality's unique heritage and attributes and explain the intent behind a particular policy. This in turn provides clarity for applicants when they are required to address the intent of a policy, and avoids needing to guess at or speculate on the intent.</p> <p>In general, the ways in which OPs prevent development is less about the overall content and more about the overly prescriptive nature of OP policies.</p> <p>An arbitrary page limit serves no discernible purpose. A lengthy OP can be more flexible and permissive than a brief one. The content of the policies is what matters, not the length of the document. We recommend the province not impose any limits of this nature, relying instead on providing clear direction regarding what an OP cannot prescribe.</p> <p>It appears highly likely that the draft schedules will introduce additional barriers to development in the form of additional layers of policy that may not otherwise be present in current OPs.</p> <p>In terms of the specific sections and schedules listed, we note:</p> <ul style="list-style-type: none"> • Separating out Serviced Land Requirement, Settlement Boundaries, and Strategic Growth Areas & Intensification Areas is unnecessary. These can and should be captured on a single schedule. • It is unclear what is intended by the Wastewater and Stormwater schedule. Mapping stormwater ponds on an OP schedule is highly unnecessary, for example. • It is unclear how mapping of MDS could possibly be undertaken in an OP, similarly with the Agri-food Network and Agricultural System. In many municipalities, attempting to map these features will introduce significant new layers of restriction than exist at present. • Separating out Natural and Man-made hazards from

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	<p>Human-made Hazards as two separate OP layers is both confusing and contradictory.</p> <ul style="list-style-type: none"> Identifying community facilities, parks and open space as a separate OP layer for example, serves no benefit. These will already be identified on a land use layer.
<ul style="list-style-type: none"> limit development/zoning standards (e.g., building heights, lot sizes and density) in official plans and requiring existing development standards in official plans (e.g., in site specific policies) to be incorporated into zoning by-laws What is your perspective on limiting development standards in official plans? To what extent should development standards be set out in official plans vs in zoning by-laws? 	<p>Prohibiting development standards (e.g. bedroom limits, setbacks, etc.) from being defined in an OP could be highly beneficial, if implemented with due consideration for unintended impacts.</p> <p>It is not necessary or beneficial to require existing development standards from OPs to be written into zoning by-laws unless these are contained in secondary plans or site-specific plans, in which case these should generally remain in the OP unless they impose greater restrictiveness than general OP policies.</p> <p>OPs should provide flexibility to adapt policies to site-specific considerations, they should not prescribe specific development standards that are otherwise best regulated through zoning by-laws.</p> <p>The KHBA recommends that the province explore prohibiting OPs from including development standards that are currently regulated through zoning. This would prevent OPs from describing provisions on lot frontage, lot area, building height, landscaped buffering, building setbacks, etc. and would immediately nullify any existing policies to that effect without requiring municipalities to amend their OPs. Municipal OPs could still regulate these standards through zoning, and OPs could deal with these standards in qualitative terms (e.g. the OP could state that landscaped buffers are required in certain situations, but the zoning by-law would prescribe the standards). This approach would also allow OPs to continue to specify road widening widths, neighbourhood-scale densities in accordance with the PPS, affordable housing targets, etc. which would continue to support good planning objectives. Municipalities would then need to ensure OPs describe qualitative criteria allowing for changes to zoning for example. OPs could still indicate where intensification and greater building heights are intended of course, and</p>

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	<p>standardized land use designations would support this objective, potentially without being so prescriptive as to define height ranges. Secondary plans and site-specific policies should likely continue to allow for more prescriptive policies, given the nature of these planning tools and the benefits they can offer.</p>
<ul style="list-style-type: none"> • require official plans to be a singular, comprehensive document for the entire municipality, including potentially prohibiting the use of secondary or site-specific plans • What is your perspective on the changes being considered regarding secondary plans and site-specific policies? Are there other ways to address these policies? 	<p>Secondary and site-specific plans are often implemented as a tool to <u>support</u> development or redevelopment. Removing these important tools altogether would run counter to the province's stated goals and is not supported by the KHBA.</p> <p>Instead, the province should consider only permitting secondary or site-specific plans where these provide expanded permissions over the underlying OP policy framework. This way, secondary plans could not be used to limit development, but they could continue to bolster efforts by municipalities to direct growth to areas where development or redevelopment is most readily supported by infrastructure.</p>
ERO #025-1097 Bill 60	
<p>Minor variances not required for certain provisions when they fall within a certain percentage of the requirement</p>	<p>Building height, lot coverage, lot frontage, FSI, density, stepbacks, vehicular parking, bicycle parking, are all provisions that should be considered for as-of-right minor variances.</p>
ERO #025-1100 Minimum lot sizes	
<p>1. 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>Minimum lot areas have no place in urban residential zoning. There is no risk to removing these requirements as they serve only to limit efficient infill and redevelopment.</p> <p>Minimum lot frontage remains an important tool to ensure adequate servicing and to provide consistency in streetscape character, though the ability to vary frontages is important to maintain.</p>
<p>2. What are best practices observed in other jurisdictions that have introduced minimum lot size reforms?</p>	<p>Kingston's urban residential zones generally regulate minimum lot frontage based on the type of ground-oriented dwelling (single-detached, semi-detached, townhouse, back-to-back townhouse), with no minimum lot area requirement. This works well and allows for</p>

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	<p>efficient creation of new communities while also supporting efficient and neighbourhood-friendly infill.</p> <p>For mid- and high-rise developments, a greater number of performance standards need to work together to ensure adequate space for efficient building design, however these vary greatly depending on the configuration of a lot and should not be standardized at the provincial level. In particular, because land economics vary so greatly across the province, a viable building design in one market will be cost-prohibitive in a different market. Municipalities should retain flexibility to regulate minimum lot size standards for apartment buildings.</p>
<p>3. Are there any circumstances where having established minimum lot sizes in municipal zoning by-laws for low-density urban residential parcels are absolutely necessary with respect to the provision of transportation, infrastructure, or upholding public health and safety?</p>	<p>Minimum lot frontage requirements ensure applicants can efficiently assess and demonstrate suitability of servicing and neighbourhood density.</p> <p>Minimum lot area requirements in urban residential areas are not required and generally serve only to limit efficient infill or introduce inefficiencies in new subdivision development.</p>
<p>4. Given the Ontario context and the government's permissions for additional residential units, what do you suggest should be the smallest size urban residential lot in terms of lot area, frontage or depth (i.e. six metre frontage, 200 square metres area, etc.) What would be the opportunities and limitations? How would these standards work together?</p>	<p>There should be no minimum lot area requirements for urban residential lots of ground-oriented housing forms (e.g. single-detached houses, semi-detached houses, townhouses, or back-to-back townhouses).</p> <p>KHBA is not prepared to recommend a provincial standard, however the following examples from Kingston are provided for information. Kingston's zoning by-law applies a minimum 6.0m for townhouse lot frontage, 7.5m for semi-detached house lot frontage, and 9.0m for minimum frontage for single-detached houses in new communities. These standards were developed in consultation with the KHBA and are supported by the association, though we note that smaller frontages may be appropriate in some circumstances.</p>

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<p>5. What other zoning requirements or performance standards could be needed to support any reduction or removal of minimum lot size requirements on low-density urban residential parcels (i.e., additional residential units, multiplexes, parking requirements, lot coverage, height and density etc.)?</p>	<p>Minimum lot frontage remains an important tool and should be combined with other provisions, especially minimum setbacks and minimum landscaped open space, to ensure properties can be developed without adverse effects on drainage or lot functionality, for example.</p> <p>Again, the following is provided for information. Ground-oriented housing (singles, semis, towns) in Kingston typically requires interior side yard setbacks of 0.6m on one side and 1.2m on the other side, provided there is an attached garage. Where there is no attached garage, one side yard must be at least 3.0m to allow a driveway beside the house. Minimum landscaped open space requirements of 30% are also generally required, though this may need to be reduced in many infill situations or with townhouses and back-to-back townhouses.</p>
<p>ERO #025-1257 Regional consolidation of Ontario's conservation authorities</p>	
<p>What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?</p>	<p>The consolidation of conservation authorities (CAs) is not supported by the KHBA. The KHBA does not support any effort to create regional conservation authorities as the unintended negative consequences of this consolidation are likely to outweigh any positive intended outcomes.</p> <p>KHBA anticipates, for example, that this would reduce response times and the ability to develop working relationships with regulatory staff, thereby creating significantly more delays and therefore increasing development costs further.</p>
<p>What opportunities or benefits may come from a regional conservation authority framework?</p>	<p>KHBA anticipates that the negative consequences would outweigh any potential benefits.</p> <p>In the KHBA's experience with the previous changes to CAs, this consolidation would likely create more administrative delays and reduce CA staff morale further. The removal of natural heritage jurisdiction from CAs, for example, increased costs to KHBA members as municipalities switched to expensive peer reviews which passed costs directly to applicants and increased both processing delays.</p> <p>KHBA recommends that the province examine localised solutions instead.</p>

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Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?	An upper tier/lower tier model, similar to municipalities, may allow for pooling of financial resources while ensuring that local CAs maintain independence and can be locally-responsive, however this would effectively mean adding a layer of governance and is generally not recommended.
How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?	<p>Regional CAs that include one much larger municipality and smaller and mid-sized municipalities would inevitably focus their resources on those larger municipalities, to the detriment of smaller municipalities.</p> <p>Ensuring that existing staff remain assigned to their respective watersheds would be of paramount importance. Another consideration would be to ensure that where the consolidated CAs apply different standards or guidelines, that the least restrictive would need to become the standard across the regional CA.</p>

We welcome the opportunity to discuss these comments further as the province continues to explore effective means of supporting residential land development.

Respectfully submitted,

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