



**MORE NEIGHBOURS  
TORONTO**

November 18, 2025

Hon. Rob Flack  
Minister of Municipal Affairs and Housing  
12th Floor, 777 Bay Street  
Toronto, ON, M7A 2J3

Dear Minister Flack,

**RE: ERO 025-1100 Consultation on Minimum Lot Sizes**

*More Neighbours Toronto is a volunteer organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase the ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are nevertheless committed to counterbalancing the anti-housing agenda that dominates Toronto's politics, and has created increased costs and environmental burden for a new generation of aspiring residents.*

**More Neighbours Toronto supports a more permissive approach to minimum lot sizes on urban residential properties.** We would like to see the government propose amendments to the Planning Act or introduce regulations under the act which eliminate or reduce minimum lot size requirements on urban residential properties. Our responses to the 5 consultation questions posed in ERO 025-1100 are included below:

**Question 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?**

Most large and fast-growing municipalities in Ontario employ minimum lot size in their zoning by-laws. This includes Toronto, which uses minimum lot sizes in the residential areas highlighted in Figure 1. Justification for these minimum lot sizes are rarely provided in Official Plans or other municipal policies. More often than not, they simply replicate the lot size that existed when housing was first constructed in the area, turning a descriptive measurement into a prescriptive restriction.

As the population of Ontario increases, these lot size limits, combined with other performance standards such as minimum frontage and maximum lot coverage, prevent home building on large portions of residential land in urban areas. Both economic theory and studies of [real world impacts](#) show that minimum lot size regulations constrain housing supply.

The benefit of removing minimum lot size requirements in Ontario's urban residential areas is that it would allow the subdivision of land in existing residential areas. Increased flexibility would reduce land costs for new low-rise housing and enable gentle density options such as smaller detached houses, semi-detached houses, multiplexes, and townhouses. This would allow for more supply of a broader range of housing, allowing more people to afford home ownership. The OECD has [recommended](#) that governments within Canada reform minimum lot size regulations as part of a larger package of zoning reform.

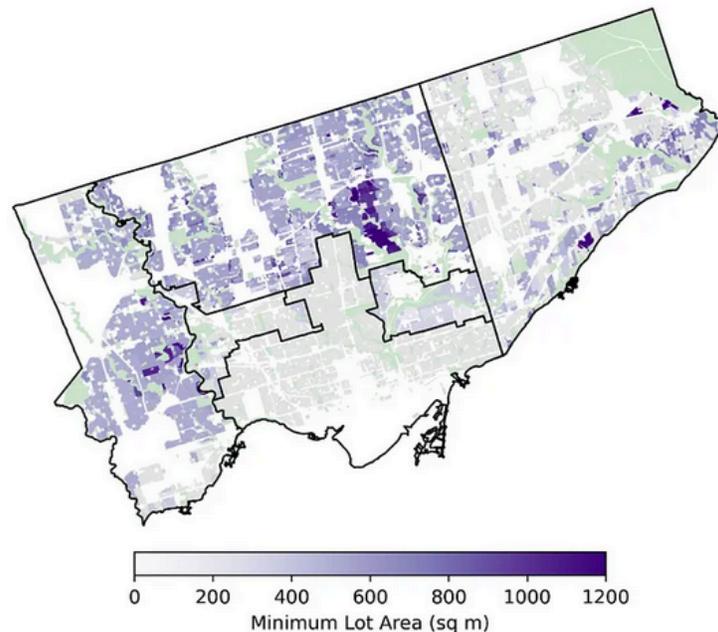


Figure 1: Minimum lot area requirements for residentially zoned land in the City of Toronto  
Image Credit: Matt Elliott, City Hall Watcher Newsletter, June 10, 2024.

## Question 2 - What are best practices observed in other jurisdictions that have introduced minimum lot size reforms?

There are several recent examples of minimum lot size reform in the United States. These include:

- In 2025, Maine passed [LD 1829](#) which prevents municipalities from enacting or enforcing minimum lot sizes above 5,000 square feet (465 square metres)
- In 2025, Texas passed [SB 15](#) which prevents minimum lot sizes above 3,000 square feet (279 square metres) in new subdivisions.
- In 2023, Montana passed [SB 382](#) which required large municipalities to eliminate or reduce minimum lot sizes by 25%.
- In 2020, Vermont passed [S.237](#), which removed minimum lot sizes for all areas with water and sewer connections.

We believe that the best international example comes from New Zealand. The [Medium Density Residential Standards](#), introduced in 2021, outline density standards that must be enacted in the zoning codes of all large municipalities. The standards do not include minimum lot sizes, and

the standards prevent municipalities from introducing other density standards (with some minor exceptions). This therefore eliminates the use of minimum lot sizes in large municipalities, and prevents their potential re-introduction through similar restrictions.

**Question 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?**

We do not believe there are any circumstances where having established minimum lot sizes are absolutely necessary in urban residential areas. The Ontario Building Code already provides adequate protection of public health and safety.

The provision of transportation and infrastructure varies greatly across neighbourhoods and municipalities in Ontario. Minimum lot sizes are sometimes used in rural areas to ensure sufficient space for septic systems or ground water recharging for wells. This is not necessary in urban areas with water and sewer connections. Provision of water, electricity, and sewer connections do not take up a significant amount of land, and in practice it will always be smaller than the land required to create a functional living space.

As an example from the City of Toronto, as shown in Figure 1, minimum lot sizes are not used to regulate low-rise residential areas in much of the former cities of York, Scarborough, and Old Toronto. This does not negatively impact transportation or infrastructure delivery in those parts of the city.

There are several examples of developed countries with modern public health and safety standards which do not use minimum lot sizes to control residential land use. This includes Japan, whose national zoning framework does not use minimum lot sizes, instead using lot floor-area-ratio and lot coverage. While some district plans in Japan do use minimum lot sizes, by default municipalities in the country do not.

**Question 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?**

We suggest elimination of the use of minimum lot size standards in urban residential areas across the entire Province of Ontario.

**Question 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.)?**

Minimum lot sizes are often used in conjunction with minimum frontage, minimum lot depth, maximum lot coverage, floor space index/ratio, and setbacks to increase the amount of land required for residential uses. Limitations on minimum lot sizes should be accompanied by limitations on restrictive use of these other performance standards as well in order to be effective. Specifically, any minimum lot size reform should also include reforms to minimum frontage and minimum lot depth, so that the minimum lot size cannot be recreated through the combination of these two other standards.

Additionally, to enable gentle density and increase housing options, minimum lot size reform should also be accompanied by reforms to permitted uses to allow semi-detached houses, multiplexes, and townhouses in urban residential areas throughout the province.

Thank you for your consideration of our comments.

Sincerely,

Damien Moule  
More Neighbours Toronto