

Ministry of Municipal Affairs and Housing  
777 Bay Street 17th Floor  
Toronto, Ontario M7A 2J3

Date: May 8, 2026

**RE: Proposed Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes (Schedules 1, 2 and 7 of Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026) – ERO [026-0300](#)**

**Re Bill 98, Schedule 7 Planning Act (4):** Subsection 34 (3.1) is re-enacted and new subsections 34 (3.2) and (3.3) are added to limit the ability of zoning by-laws to require the minimum area of a parcel of urban residential land that is not in the Greenbelt Area to be greater than the prescribed area and to regulate minimum lot frontage or minimum depth of a parcel in such a way as to require the parcel to be greater than the prescribed area.

### **Comment Summary Statement**

The City of Ottawa has no concerns with the intent to prescribe a minimum lot area. In fact, the City permits lot sizes that are smaller than the proposed 175 square metres. However, we strongly recommend the Province maintain the ability to regulate minimum lot widths, which are essential to ensuring development that supports health and safety.

### **Detailed Comments**

Recognizing the impact minimum lot area requirements have on the ability to provide housing, the City's new Comprehensive Zoning By-law 2026-50, enacted on March 11, 2026, eliminates minimum lot area requirements within the N1-N6 Neighbourhood (urban residential) zones. Instead, the lower-density Neighbourhood (N1-N3) zones apply maximum limits on the number of units, and these limitations are in part dependent on the area of the lot. To this end, the City does not have concerns with the proposal to prescribe a minimum lot area.

However, the City would like to see the inclusion of lot widths be expressly permitted. It is noted that the proposed provincial amendments would also limit the ability to prescribe minimum lot widths insofar as it would require a larger lot area than the prescribed minimum lot area, as noted in the proposed section 34(3.3) of the *Planning Act*. Minimum lot width requirements were included in the City's new Comprehensive Zoning By-law as they are important to ensure a minimum amount of space around buildings to access roofs, maintain walls and access services.

Even in the case of rowhouses or other vertically attached buildings where one unit does not directly face the street, requirements for lot width ensure water and sewer connections have enough room to reach the building and provide a means (in the minimum width required) to maintain those same services when that becomes necessary.

The smallest lot width proposed in Ottawa's new Comprehensive Zoning By-law for a vertically attached (rowhouse or semi-detached) unit, is 4.5 metres. For a stand-alone building, the requirement would be 6.0 metres to account for side yards necessary to provide sufficient space to access and maintain buildings and provide separation. The proposed 4.5 metres minimum lot width incorporates sufficient space for independent servicing, maintenance, driveways, and walkways.

We thank you for the opportunity to comment and are available if further discussion or feedback is required.

Sincerely,

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