

November 21, 2025

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

Submitted online and via email to PlanningConsultation@ontario.ca

To the Planning Consultation,

Re: ERO # 025-1100, Consultation on Minimum Lot Sizes

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation process for ERO # 025-1100 and for receiving feedback on the subject of minimum lot size requirements on urban residential lands. The Ontario Federation of Agriculture is dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with on issues, legislation and regulations that would impact the sustainability and growth of our farm businesses.

OFA supports reducing or removing minimum lot size requirements in low-density urban residential areas, especially as a tool for local planning authorities to direct and target growth. Minimum lot sizes can act as a barrier to the densification and intensification of Ontario's urban settlement areas. Single-use and low-density urban residential areas, enabled by larger minimum lot sizes, are often tax-inefficient for municipalities, dependent on private commuter vehicles for transit, and built at the expense of valuable farmland in the province. These and related settlement area expansions are the main contributors to Ontario's unsustainable trends in farmland loss and climbing farmland values. Enabling Ontario's municipalities to densify their urban areas under a provincial standard for smaller urban residential lots would provide much needed relief to farmers experiencing development pressure.

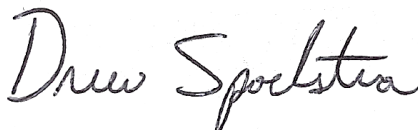
In contrast, like all rural residential lots, small residential lots in rural areas are generally undesirable because they contribute to farmland loss, create land use compatibility challenges related to *minimum distance separation* (MDS), increase conflicts between commuter traffic and slow-moving farm equipment, and put additional strain on the land's ability to support on-site drinking water wells and septic systems.

All the while, farmland is more tax efficient by way of municipal service costs, contributes to Ontario's powerful \$51.4 billion agri-food economic sector, and provides environmental services such as carbon sinking, rainwater and snowmelt ground infiltration, and biodiversity-supportive habitats, among other benefits that are not easily replicated by urban infrastructure.

These and other reasons are why OFA supports removing barriers to infilling, densification, and intensification; higher density targets in urban settlement areas; enacting fixed urban boundaries; efficient public transit for urban commuters; mixed-use developments in urban settings; and encouraging the redevelopment of brownfields and greyfields.

OFA appreciates the opportunity to provide our feedback and perspectives on minimum lot sizes in the province, and is encouraged to see measures that may help to reduce development pressure felt by Ontario's agricultural system in this consultation. We look forward to working with the provincial government to find policy solutions that support the agri-food sector.

Sincerely,



Drew Spoelstra
President

cc: Hon. Rob Flack; Minister of Municipal Affairs and Housing;
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness;
Hon. Lisa M. Thompson, Minister of Rural Affairs; and
OFA Board of Directors.

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.