



Greater Ottawa Home Builders' Association
Association des constructeurs d'habitations d'Ottawa

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

Re: ERO 025-1100 Consultation on Minimum Lot Sizes

Please accept the below from the Greater Ottawa Home Builders' Association (GOHBA) and its members as its submission to the government's request for feedback on *Consultation on Minimum Lot Sizes* (ERO 025-1100).

GOHBA has been the proud voice for the Ottawa home building community since 1951. Our 440 members include builders, developers, professional renovators, trade contractors, suppliers and manufacturers serving the residential construction and professional renovation industry.

Our comments are complementary to and in concert with those of the Ontario Home Builders' Association as the provincial voice of the residential construction industry.

GOHBA supports legislative and regulatory changes that make it easier and faster to build new homes. Measures that expand housing choice, improve affordability, and streamline municipal approvals are critical to increasing supply.

Any initiatives that reduce the number of minor variance applications required to go the Committee of Adjustment (CoA) would represent meaningful progress as it would reduce delays and costs.

In past submissions, GOHBA has raised concerns about Ottawa's CoA systemic issues in process and practice, highlighting inconsistent decision-making and lengthy delays. Reducing the number of applications that must appear before the CoA will expediate approvals, reduce administrative burden and lower costs. More timely and efficient outcomes for municipalities, builders and the community is the end goal.

Lot Sizes are the Tip of the Iceberg

In urban low-density residential areas that are intensifying, lot size requirements have no function, and therefore result in over-regulation.

In many instances, lot size requirements perpetuate housing injustice in several ways:

- Zones people out by triggering the development of only larger (more expensive) units,
- Limits housing options and diversity of unit types,
- Prevents innovative housing solutions on a greater variety of lot sizes, and
- Slows the housing market by limiting development opportunities and making business development options not viable.

Building Codes set the standard for room sizes, so minimum lot size requirements are not needed to prevent the development of uninhabitably narrow buildings.

Zoning should ensure that new development is contextually appropriate, especially in infill neighbourhoods where residents are experiencing more change. However, residents are concerned with the form and fit of buildings that are oversized compared to the surrounding neighbourhood, as opposed to buildings that are smaller. Minimum lot size requirements are therefore of no value, but regulating maximum building sizes would be appropriate.

There are a variety of mechanisms in zoning across the province that produce the same negative impacts as minimum lot size requirements. Zoning by typology and density cap provisions also result in larger units, pricing people out of neighbourhoods, limit diversity of housing, prevent innovation and slow the housing market.

To support the development of effective regulations, GOHBA recommends that:

- 1) The scope of the regulations should extend beyond reducing minimum lot sizes to the removal of minimum lot sizes in urban residential areas.
- 2) The Government should expand their consideration beyond urban residential areas.

The scope of the regulations should extend beyond reducing minimum lot sizes to removal of minimum lot sizes in urban residential areas.

If the overarching goal is to reduce the number of applications submitted to, and heard by the CoA, substantially reducing or removing minimum lot size requirements in fully serviced urban areas is essential. GOHBA emphasizes that if the province opts to reduce minimums rather than remove them, the reductions must be significant to meaningfully decrease variance activity. Our internal data shows that minor variances for:

- Minimum lot area variances, on average, were requested to be reduced by 20.39%
- Minimum lot width variances, on average, were requested to be reduced by 18.49%

This data is from an internal analysis GOHBA conducted of the most common types of minor variance applications heard before City of Ottawa CoA Panels 1 and 2 across 2023 and 2024. The data reflects real builder experience and demonstrates the scale of change required to produce measurable impact.

Allowing more flexible standards would enable a broader range of low-rise housing forms, including compact and factory-built units. Greater flexibility would also lower development costs by reducing land requirements, improve affordability for first-time home buyers seeking attainable starter homes, and encourage gentle density and innovation without altering existing neighbourhood character.

The Government should expand their consideration beyond urban residential areas.

While the proposed regulation is focused on urban residential lands, GOHBA urges the province to also consider implications for rural villages and privately serviced areas.

For example, minimum lot sizes in communities such as Greely increased from 0.2 ha to 0.4 ha in 2015, resulting in inefficient land use within designated settlement areas. GOHBA emphasizes that the determinative factor in these contexts should be a mass-balance calculation ensuring adequate septic dilution, not a blanket minimum lot size.

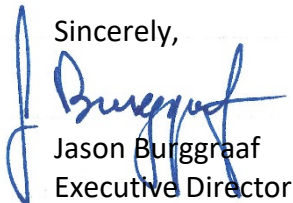
When considering cumulative area dedicated to roads, parks, stormwater blocks and other non-residential elements of subdivision, safe septic capacity can often be achieved with average lot sizes between 0.2 and 0.4 ha, without requiring each individual lot to meet an identical minimum.

Conclusion

We thank the Ministry for the opportunity to comment on this proposal and look forward to continuing to work with the provincial government. We urge the government to consider our recommendations to ensure this regulation achieves its intended outcomes.

We are pleased to answer questions or provide further information as requested.

Sincerely,



Jason Burggraaf
Executive Director