

November 21, 2025

Submitted online and via email to PlanningConsultation@ontario.ca

RE: Consultation on Minimum Lot Sizes

The City of Guelph (the “City” or “Guelph”) appreciates the opportunity to provide feedback regarding the use of minimum lot sizes as a tool for increasing housing supply. Below you will find the City’s responses to the Ministry’s discussion questions, as provided in the [Ministry’ Environmental Registry of Ontario posting](#), to inform future policy regarding minimum lot sizes:

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?

Overall, the City of Guelph supports intensification in existing low-density urban residential areas, and believes that reducing minimum lot sizes is one of many tools that can be used to encourage greater housing supply. Reducing lot sizes supports the new Provincial Policy Statement (2024) emphasizing flexibility and helping to meet long term housing goals and targets including intensification, new housing units, and transit-oriented developments.

In Guelph, smaller lots are already permitted in practice through large lots developed as a condo with private roads. Currently, existing permissions for [Additional Dwelling Units \(ADUs\)](#) and semi-detached and townhouse units in low density residential areas encourage homeowners and developers to transition from single-detached to these alternative more compact built forms when intensifying existing lots. Reducing minimum lot sizes to permit single detached homes on smaller lots might encourage more housing that is the same form as existing housing, rather than encouraging higher density re-development to default to semi-detached and townhouse forms.

Additionally, reducing minimum lot sizes for single-detached homes may make it easier to sever existing lots without demolishing existing houses, making it easier to add additional units. Reducing minimum lot sizes can also lower land costs per unit, which supports housing affordability.

The City would like to note that there are several risks that minimum lot sizes are often used to mitigate:

- One such risk is parking availability, where increasing density in existing neighbourhoods, especially older areas with narrow rights-of-way, may strain existing parking capacity, and impact congestion and road safety.
- Another risk is the availability of water and wastewater servicing capacity. While the City continues to encourage gentle density where possible, we have

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found that existing water servicing pipes are often not large enough to accommodate even a single ADU without impacting water capacity.

- Finally, heritage properties may also be impacted by a reduction in minimum lot sizes. Without appropriate alternative protections, minimum lot size reductions may result in severances which threaten heritage features of properties.

With these concerns in mind, the City believes that minimum lot sizes are a broad tool to address these risks, and they may be better mitigated through more targeted standards or property-specific provisions, such as setbacks, lot coverage, density, and parking requirements.

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?

As mentioned above, there are several risks to servicing and safety that minimum lot sizes may help mitigate. However, these risks are often better addressed through other targeted standards and policies. The City encourages the province to continue to allow municipalities to apply these targeted standards at their own discretion, to mitigate these risks and respond to unique local challenges while supporting shared housing goals. It is also noted that when many Plans of Subdivision were created there were Storm water management assumption that dictated the size of local ponds with the assumption of a percentage of infiltration at the lot level. If this infiltration does not occur there are significant risks to localized flooding and a significant rise in the City's operating budgets to address flooding and an increased requirement for storm pond clean out all of which impact operating budgets and taxes.

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?

While we cannot comment on a single minimum lot size standard that should apply province wide, the following standards apply in Guelph:

Guelph's current R1 zoning permits single, semi, and street-townhouses. Minimum lot Area and Lot Frontage requirements are 460 m² and 15m for single detached, 230 m² and 7.5m for semi-detached, and 180 m² and 6m for street-townhouses. Townhouses have a maximum lot coverage of 55 per cent and a landscape requirement of 35 per cent. Single and semi-detached homes don't have this standard, except singles that contain 3 units, which have a minimum landscaped open area of 35 per cent. Single-detached homes permit up to 3 ADUs, while semis and towns only permit 2 ADUs.

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.)?

As mentioned above, lot coverage, density, and setback requirements often accomplish similar objectives to lot area requirements, and are more targeted towards the impacts. Reducing lot area requirements may require that zoning by-laws also include provisions for these other development standards.

Importantly, addressing water and wastewater capacity concerns and well as storm water management will be essential for any future reductions in minimum lot sizes to succeed at promoting gentle density. As stated before, we have found that existing water servicing pipes, especially in older neighbourhoods, are often not large enough to accommodate even a single ADU without impacting water capacity. This means that the landowner must hire a contractor to replace this pipe at a significant cost. Provincial funding support will be essential to support gentle density without shifting this substantial servicing cost onto homeowners or property taxpayers.

Closure:

We appreciate this opportunity to provide input on this proposal. Should you have any questions about the feedback provided, or require additional details please do not hesitate to contact the City at intergovernmental.relations@guelph.ca.

Sincerely,

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