



Planning and Economic Development Department

Planning Division

71 Main Street West, 5th Floor - Hamilton

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November 21, 2025
Ministry of Municipal Affairs and Housing
Province of Ontario

SENT VIA ERO POSTING

RE: City of Hamilton Comments on ERO 025-1100 - Consultation on Minimum Lot Sizes

Attached, please find City of Hamilton Staff Comments in response to the above noted ERO posting. Hamilton Planning Committee and City Council will be reviewing these comments at their January 13, 2026, and January 21, 2026, meetings.

Hamilton City Council may choose to amend or add to the enclosed comments which would be provided in a subsequent letter.

Should you have questions or comments, please contact myself or Alana Fulford, Supervisor – Zoning Bylaw Reform – Zoning and Committee of Adjustment Section at (905) 546-2424 Ext. 4771 or by email at Alana.Fulford@hamilton.ca.

Regards,

Anita Fabac, MCIP, RPP
Acting Director of Planning and Chief Planner,
Planning Division
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City of Hamilton

Enclosed.

ERO 025-1100 - Consultation on Minimum Lot Sizes

The following table contains guiding questions provided by the province through [ERO 025-1100](#) to elicit feedback on proposed changes to minimum lot size requirements on urban residential lands, with a focus on improving housing options and affordability. Additional information on the proposed changes, along with supporting materials provided by the Province can be found via [ERO 025-1100](#).

ERO 025-1100 Guiding Questions	
Question	Comments
<p>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?</p>	<p>Changes to the <i>Planning Act</i>, Section 35.1 (1) regarding additional residential unit permissions on urban residential lands have provided significant opportunities for gentle intensification in low density residential neighbourhoods. In the City of Hamilton, most low density residential properties now permit up to four dwelling units which can be achieved through a range of housing options, including triplexes, fourplexes, and internal and detached additional dwelling unit permissions (additional residential units). These permissions are by far the greatest factor in increasing housing options and promoting gentle intensification in neighbourhoods.</p> <p>Municipalities typically have a range of low density residential lots sizes and in many cases, the minimum lot size requirements are in place to address certain conditions. It is staff's opinion that in the urban environments predominant in Southern Ontario, lot size is not acting as a barrier to gentle intensification. Many newer suburban neighbourhoods have smaller lot fabric, reflecting increased land values and housing costs.</p> <p>In the City of Hamilton, there are three Low Density Residential Zones, all of which permit the same forms of housing and</p>

	<p>additional dwelling unit permissions. The most common residential lot size in the urban area is around 12 metres in width with a lot area of around 350 sq m.</p> <p>Minimum lot size requirements exist for Low Density Residential properties to ensure adequate drainage can occur through the provision of a minimum amount of landscaped area, maintenance and access around the lot is possible, and the built form maintains functionality which can be compromised with narrow lots. In areas with tight lot fabric, on-street parking can become functionally impossible to provide given lack of lot width. Where larger minimum lot size requirements are in place, these requirements may reflect the infrastructure that is available. In the City of Hamilton, the minimum lot width and lot area requirements of the Low Density Residential – Large Lot (R2) Zone are in place as many of these lots are in areas where stormwater infrastructure is not in place and thus adequate space is required to ensure on-site drainage can occur.</p> <p>The reduction or removal of minimum lot sizes in well-served urban residential areas can be a valuable tool to support increased housing supply, broaden housing options, and promote more walkable, transit-supportive neighbourhoods. However, this change must be accompanied by strong complementary regulations and design guidance to mitigate risks related to built form, amenity space, infrastructure capacity, and livability. For example, the removal of minimum lot sizes could result in inadequate space for trees along sidewalks/boulevards. Maintaining adequate space for tree canopy coverage protects residents from extreme heat,</p>
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ERO 025-1100 - Consultation on Minimum Lot Sizes

	<p>improves air quality, and creates shaded, comfortable routes that encourage walking, cycling, and other forms of active transportation.</p> <p>Reduced minimum lot sizes can support compact, complete communities where residents live close to nutritious food outlets, community gardens, and food services. However, minimum lot sizes should not impede farming operations nor eliminate opportunities for food production spaces (e.g., shared gardens, urban orchards, or small-scale greenhouses).</p>
<p>What are best practices observed in other jurisdictions that have introduced minimum lot size reforms?</p>	<p>While there has been best practice research completed on minimum lot size for rural residential and agriculture lots, City of Hamilton staff are not aware of any best practices for minimum urban residential lot sizes beyond what is discussed above.</p>
<p>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?</p>	<p>As commented previously, minimum lot size requirements are in place to ensure standards of site access, design, and functionality are maintained, and respond to infrastructure needs. As noted, minimum lot sizes exist to ensure adequate site drainage can be maintained, maintenance and access on a lot is possible, and the built form maintains functionality which can be compromised particularly with narrow lots. In areas with tight lot fabric, on-street parking can become functionally impossible to provide with very narrow lots. Further, where larger minimum lot size requirements are in place, these requirements may reflect the servicing that is available. In Hamilton, the minimum lot width and lot area requirements of the Low Density Residential – Large Lot (R2) Zone are in place as many of these lots are in areas where stormwater</p>

ERO 025-1100 - Consultation on Minimum Lot Sizes

	<p>management infrastructure is not in place and adequate space is required to ensure on-site drainage can occur.</p>									
<p>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 metre area, etc.) What would be the opportunities and limitations? How would these standards work together?</p>	<p>The City of Hamilton’s oldest residential neighbourhoods typically exhibit some of the tightest lot fabric in the city and are zoned the Low Density Residential – Small Lot (R1a) Zone which requires the following minimum lot width and area requirements:</p> <table border="1" data-bbox="961 570 1772 792"> <thead> <tr> <th data-bbox="961 570 1230 607">Use</th> <th data-bbox="1236 570 1503 607">Lot Width</th> <th data-bbox="1509 570 1772 607">Lot Area</th> </tr> </thead> <tbody> <tr> <td data-bbox="961 612 1230 716">Single Detached Duplex Triplex</td> <td data-bbox="1236 612 1503 716">9 m</td> <td data-bbox="1509 612 1772 716">270 sq. m.</td> </tr> <tr> <td data-bbox="961 721 1230 792">Street Townhouse</td> <td data-bbox="1236 721 1503 792">6 m</td> <td data-bbox="1509 721 1772 792">180 sq. m.</td> </tr> </tbody> </table> <p>Smaller lots, constraints increase in the provision of adequate space for maintenance, access, and drainage. The provision of trees and ability to grow the urban tree canopy can be compromised. Further, smaller residential lots are challenged to accommodate additional residential units, notably detached additional residential units as there often is not adequate space to maintain a functional lot.</p> <p>From a public health perspective, smaller lots should be complemented by public open spaces and community infrastructure that support local food access and outdoor gathering.</p>	Use	Lot Width	Lot Area	Single Detached Duplex Triplex	9 m	270 sq. m.	Street Townhouse	6 m	180 sq. m.
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	<p>Zoning requirements and performance standards could include provisions that protect space for local food production and access. For example:</p> <ul style="list-style-type: none"> • Lot coverage and open space minimums to ensure yards or communal areas can accommodate gardens, small-scale urban agriculture, or rainwater collection for food production. • Limits on impervious surfaces to maintain soil health, reduce runoff, and support backyard or community gardening. • Height, density, and unit separation standards that preserve sunlight access for rooftop or balcony gardens. • Parking standards that allow shared space for farmers' markets, food trucks, or community food hubs without compromising residential safety. • Incentives or requirements for green infrastructure, such as composting areas, edible landscaping, or stormwater management integrated with garden spaces.
<p>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.)?</p>	<p>As housing options are expanded within low density residential areas i.e. multiplex permissions, there are more built form and site design elements to accommodate which necessitates minimum lot size requirements. In Hamilton, where fourplexes are permitted in all Low Density Residential Zones, minimum lot size and other performance standards are in place to address the greater intensity of use of the property. Performance standards ensure there is adequate space for access between the front and rear of the property, or maintenance purposes and access for residents. Space is required for waste storage, bicycle parking, and amenity area for residents. Multiplex infill development in a neighbourhood context also needs to be considerate of overlook and privacy which is supported through minimum setback requirements and related performance standards.</p>