



Development Services  
Public Works  
**Halton Region**  
1151 Bronte Road  
Oakville, ON L6M 3L1

**November 21, 2025**

Provincial Planning Branch  
**Ministry of Municipal Affairs and Housing**  
13<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON M7A 2J3

***RE: ERO Notice #025-1100 - Consultation on Minimum Lot Sizes***

To Whom It May Concern:

Halton Region staff appreciate the opportunity to review and provide comments related to the consultation on setting minimum lot size requirements on urban residential lands, which is currently posted for commenting under ERO Notice #025-1100 (the "Notice"). Regional staff thank the Ministry of Municipal Affairs and Housing (MMAH) for its efforts to increase housing options, improve affordability, and expand access to homeownership across Ontario.

As an upper-tier municipality without planning responsibilities under Bill 185, Halton Region no longer has approval authority over planning matters; however, the Region remains responsible for key regional infrastructure and services. These services include water and wastewater infrastructure, regional roads, public health, and source water protection, among others.

Because the regional services are essential to supporting and enabling local municipal growth, comments from Regional staff provided in this submission focus on ensuring effective and efficient coordination between local planning and regional servicing. Comments are organized by the following consultation questions identified in the Notice:

- A. 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?
- B. Are there any circumstances where having established minimum lot sizes in municipal zoning by-laws for low-density urban residential parcels are absolutely

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necessary with respect to the provision of transportation, infrastructure, or upholding public health and safety?

- C. 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.)?

## Halton Region Staff Comments

### **A. 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?**

Minimum lot sizes help municipalities to anticipate growth and plan accordingly for the required infrastructure to support it. In a two-tier municipality such as Halton Region, changes to the minimum lot sizes could have a cumulative impact on the delivery of infrastructure that rely on coordination between the Region and its local municipalities.

Any reduction or removal of minimum lot size requirements must consider the implications on the Region's ability to plan for and deliver key regional infrastructure (e.g. water and wastewater) required to support and enable local municipal growth. Changes to the minimum lot size requirements must also consider the potential risks of putting increased pressure on the existing overall servicing and system capacity.

### **B. 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**

Regional staff note the following circumstances that would warrant minimum lot sizes to be maintained:

- Areas with environmental constraints such as floodplains, source water protection zones, etc.; and
- Areas where the Region has assessed limited servicing capacity.

Although this consultation is scoped to low-density urban residential areas, we would like to note that rural areas that are privately serviced should also maintain the established minimum lot sizes.

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**C. 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.)**

Regional Staff suggest that MMAH should consult the Ministry of Environment, Conservation and Parks (MECP) with respect to Inflow and Infiltration (I&I) requirements for potential servicing connections that would be associated with smaller lot sizes, as well as considerations related to potential congestion of infrastructure (water/sanitary/storm) and utilities.

**Conclusion**

Halton Region staff appreciate the opportunity for the consultation on reducing or removing minimum lot size requirements in low-density urban residential areas to encourage gentle density, increase housing supply, broaden housing options, and promote home ownership. We recognize the potential benefits of this initiative, including greater flexibility for municipalities and improved housing affordability.

At the same time, it is essential that any changes to minimum lot size requirements consider the implications on the Region's ability to plan for and deliver key infrastructure required to support local municipal growth, as well as mitigate any risks associated with putting increased pressure on the existing overall servicing and system capacity.

Thank you for providing the Region with the opportunity to comment on the consultation. We would welcome additional consultation opportunities in the future before implementing any regulatory changes related to the minimum lot size requirements that would allow the Region to better understand and assess the implications.

Respectfully submitted,



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