

November 20, 2025

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

**Re: Consultation on Minimum Lot Sizes – ERO Number 025-1100**

This letter constitutes formal comments for ERO Number 025-1100, posted to the Environmental Registry of Ontario on October 23, 2025. It is the County's understanding that while no legislative changes have yet been proposed on this topic, the government is seeking early feedback to better understand the linkage between minimum lot sizes on urban residential lands and increased housing options and affordability.

Council and staff have reviewed the consultation questions outlined as part of ERO Number 025-1100. In considering the consultation questions from a Perth County context, we respectfully provide the following responses for consideration:

1. While lot sizes are regulated as a 'minimum' in the Province, many municipalities, and developers, use minimum lot size as a target to approximate the density of development. Further, when reviewing applications, municipalities are looking for developers to maximize available space and promote lot sizes as close to the minimum as possible to ensure land is being used efficiently. Further, in rural communities, there remains desire for "estate lots" where large, 1 acre+ lots are developed for single family homes. Without a minimum lot size to guide development or to use as reference for municipalities, there is concern from Planning Staff that lots have the potential to get larger than what currently exists. If minimum lot size is removed, consideration should be given to maximum lot sizes if building smaller, affordable single-detached houses is truly the goal. However, the effect of removing minimum lot sizes and not providing these limitations needs to be considered as there is significant risk in causing the inefficient use of land and infrastructure, resulting in significant financial loss to municipalities and loss of prime agricultural lands.

2. Should lot sizing be standardized across the province, consideration should be given to creating standardized lots for urban areas, where access to active transportation and public transit is available, and separately standardize lots for rural areas. In rural areas, where active transportation and public transit are not available, lot sizes still need to be large enough to accommodate vehicle parking, in either the front or rear yard, and wide enough to ensure safe movement in and out of driveways. With the removal of minimum lot size requirements and/or the standardization of lot size requirements, additional performance standards may be required to support efficient and appropriate housing options. These standards include driveway separation requirements, street parking standards, and density targets to ensure that lots for single-detached units are not developed inefficiently into estate lots that do not make efficient use of land and infrastructure.

The above-noted responses have been discussed by County Council and endorsed for submission to the Ministry for consideration regarding the consultation questions proposed through ERO Number 025-1100.

Sincerely,



Doug Kellum, Warden



Lori Wolfe, Chief Administrative Officer