

**November 17, 2025**

**Attn:** Ministry of Municipal Affairs and Housing

**RE:** Consultation on Minimum Lot Sizes

**ERO number:** 025-1100

**Organization:** City of Kitchener

**Discussion Questions:**

- 1. 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?**

The City of Kitchener recognizes the intent to encourage gentle density, broaden housing options, and increase supply. Our Zoning By-law permits up to four dwelling units on all lots, with seven residential zones (RES-1 to RES-7) allowing a wide array of densities based on context. Lot width and area regulations are effective tools for enabling additional density in growth areas.

However, removing minimum lot size requirements may result in inappropriate built forms, such as large single detached dwellings on small lots, which may not increase overall housing supply. Kitchener's approach – permitting a range of residential uses (single detached, semi-detached, street townhouses, etc.) in all zones – has led to a variety of appropriately scaled housing and increased supply.

- 2. What are best practices observed in other jurisdictions that have introduced minimum lot size reforms?**

Kitchener uses building permit data and drawings to determine suitable lot width and size regulations, ensuring zoning aligns with what homebuilders want to build. The zoning by-law is updated annually to address implementation challenges. Lot sizes are set with regard to Ontario Building Code minimums, ensuring residential buildings are livable and contribute to quality of life.

- 3. 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?**

Minimum lot width and area regulations are essential for ensuring outdoor amenity areas, vehicle parking, groundwater recharge/infiltration, and landscaping. These standards help ensure each lot is functional for its intended purpose.

Reducing minimum lot sizes can lead to constrained driveway widths and lengths, limiting the ability to provide adequate on-site parking. This may result in increased on-street parking demand, congestion, and potential conflicts with snow clearing, waste collection, and emergency access. On-street parking is currently the City of Kitchener's biggest by-law complaint, and any increase in parking concerns could lead to a negative perception of new housing in existing communities. Ensuring sufficient lot frontage and area is critical to accommodate driveways that meet municipal standards and support safe, accessible parking for residents.

4. **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?**

As noted above, Kitchener lot width and area regulations vary for different residential uses. The following are the minimum sizes based on the residential use:

- 235 square metres lot size, 9 metre lot width for single detached
- 210 square metres lot size, 7.5 metre lot width for semi-detached
- 135 square metres lot size, 5.5 metre lot width for street towns
- 495 square metres lot size, 19 metre lot width for 5+ units residential and non-residential

For more information, please see:

[https://app2.kitchener.ca/appdocs/Zonebylaw2019/PublishedCurrentText/SECTION%207%20-%20Residential%20\(RES\)%20Zones//Section%207.pdf](https://app2.kitchener.ca/appdocs/Zonebylaw2019/PublishedCurrentText/SECTION%207%20-%20Residential%20(RES)%20Zones//Section%207.pdf)

5. **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.)?**

If minimum lot sizes are reduced or removed, more complex regulations for lot coverage, setbacks, landscaping, and parking will be needed. This could reduce flexibility for homebuilders and limit the variety of housing options deliverable on a given lot.