ARRIS Strategy Studio
801 - 101 Roehampton Ave
Toronto M4P 2W2
647 330 9061
TMills@ARRIS.ca

COMMENTS RE: SIXPLEX CITY-WIDE STUDY

extending multiplexes from fouplexes to sixplexes

Examples of building types within the ABCRA neighbourhood:


65-69 Marlborough Ave


81-85 Marlborough Ave


130 Macpherson Ave


41-43 Hillsboro Ave


28 Macpherson Ave

INTRODUCTION

I was requested by the ABC Residents Association to prepare this report on the *SIXPLEX CITY-WIDE STUDY (SCS)* that had been prepared by the City of Toronto's Planning Department. The purpose of this report has been to provide the ABCRA Board and Fontra members a better understanding of the implications of the proposed City Official Plan and Bylaw amendments, with recommendations and insights for further study to resolve potential adverse impacts and complexities arising from the City's intent to approve as of right fiveplexes and sixplexes city wide.

MY BACKGROUND

My opinions are founded upon my architectural training and experience over the years, including twenty years running a design-build practice that undertook over 200 extensive renovations and additions in Toronto's traditional neighbourhoods, followed by twenty plus years as a Registered Professional Planner, which included four years working in a design and planning consultancy in Australia, which offered a refined perspective of urban growth challenges being about consolidation, namely, fitting things together, rather than simply intensification.

The objective of the SCS is to broaden the scope of sixplexes to include all neighbourhoods, where currently fourplexes are the maximum permitted, while sixplexes have been recently adopted along major streets. ***[OPA p.649 and p.727]***

THE MULTIPLEX PROSPECT

During a break in an OMB proceeding, the Chair opined: *Toronto has respect for sustainable building practices and a desire to maintain the character of the city's existing neighbourhoods, so why is it that at the same time Toronto seems bent upon cannibalising itself?* I don't have an answer to that. However, it is a question I ask myself regularly. Will one eventually see Toronto's missing-middle

as a carpet of sixplexes, cumulatively accommodating over 1.8 million dwelling units? I doubt multiplexes will become that ubiquitous. Although I can see major streets undergoing rampant replacement developments, I expect that sixplexes will be at the low end of the spectrum, with Midrises and Towers occurring where and when land assemblies have reached fruition.

For neighbourhoods off of the major streets, the uptake will be less rampant, more sporadic per area and per block. The Study's birds-eye sketch is informative, suggestive of the initial stages of a block encountering reinvestment over time. Some blocks will pas through the illustrated stage quickly (in planning parlance), most blocks that will experience a more subdued change over the long term.

[SCS p.19]

THE SCS STUDY SAMPLE

In May 2023, Council had adopted four-unit multiplexes. City Planning has monitored the multiplex uptake over the past two years, during which, approximately 222 multiplex permits were issued.

- This is a small sample considering the expanse of Toronto's neighbourhoods and population.
- The sample is even smaller considering the projects were spread across the city's 25 Wards.
- Most projects arose in the traditional city area, similar to laneway and garden suites before.
- Only 42 of the 222 multiplex projects had reached completion by November 2024.

The 222 multiplex projects split roughly into three relatively equal groups: ***[SCS p.13-p.22]***

- 71 were duplexes, delivering 71 additional units beyond the base house unit.
  An existing house can often be converted to a duplex breaking into smaller dwelling units.
- 83 were triplexes, delivering 166 additional units beyond the base house unit.
  Some of these may be renovation-additions, others will be replacement buildings.
- 68 fourplexes, delivering 204 additional units beyond the base house unit.

MULTIPLEX UPTAKE

Cumulatively, duplexes and triplexes in the study delivered 237 additional units, compared to fourplexes delivering 204 units. This is a significant insight. Smaller scale multiplexes are more compatible, better suited to fit into the diverse characteristics of different neighbourhoods. In turn, they can be produced both by means of renovation as well as by replacement housing, and they can be undertaken by the greater array of smaller builders. While both large and small multiplexes will, for the most part, be speculative ventures, smaller complexes can suit specific homeowners' interests in accommodating under one roof their extended families and/or keep their established friends.

49-51 Harcourt Avenue
Double Duplex

OTHER EXAMPLES

In addition to working with the information in the Staff's April 8th SCS report, I have draw upon two other recent multiplex initiatives; both of which fell short of approval, these were:

- 40 Snowdon Avenue, which the CofA refused
- 1090 Kipling Avenue, where the TLAB dismissed the developer's appeal

Both proposals were refused, which doesn't detract from their significance. Their assessments clearly delved into issues which are germane to multiplexes. From their examples, pathways can be seen for successfully navigating through to appropriate outcomes, along with illuminating the difficulties to be aware of and avoid.

I will also touch on some broader considerations, just as the Staff's April report has done.

EXAMPLES: EXISTING MULTIPLEXES


58-50 Oriole Gardens


9A-9B Humewood Cr


18-20 Oriole Crescent


471 Balliol Street


140 Kenwood Avenue

Illustrated here are existing examples of multiplexes, provided as yardsticks as to the scale of sixplexes.

- **58-60 Oriole Gardens (width:27m x depth:24.5m; 3½-storey)**
  Part of an older cluster of semidetached sixplexes or 'double sixplexes'. The buildings' scale is massive and abruptly transitions to the adjacent house immediately to the right. The garbage is significant and has no designated garbage area. The bins obstruct the sidewalk when they are brought forward on collection day. With a 25m lot depth, it lacks a significant rear yard and soft landscaping in general.

- **9A-9B Humewood Crescent (width:14.5m x depth:33.5m; 3½-storey)**
  Part of a cluster of multiplexes. Somewhat similar to 58-60 Oriole Gardens it is a semidetached fourplex, or 'double fourplex'. I'm fond of this cluster, having lived here circa 1975.

- **18-20 Oriole Crescent (width:12.0m x depth:33.5m; 2-storey)**
  Part of a cluster of semidetached triplexes or 'double triplexes'. The scale and massing is similar to centre-hall-plan houses in the vicinity.

- **471 Balliol Street (width:22.0m x depth:53.0m; 2½-storey; unit count uncertain)**
  It is a standalone multiplex surround by houses, cost engineering is clearly evident in the simplistic design, and the yellow brick is not compatible with the character of the surrounding neighbourhood.

- **140 Kenworth Avenue (w:14.5m x d:36.7m; 3½-storey; unit count uncertain)**
  Recently constructed, surrounded by low-rise apartments and fourplexes.

FUNDAMENTAL MULTIPLEX ZONING CHANGES

Zoning standards have been simplified for multiplexes within the R, RD, RS, RT and RM zones.
As it stands today, fourplexes are permitted within neighbourhoods, while sixplexes are permitted along major streets. Below, I have listed the principal zoning 'levers' intended to stimulate the generations of multiplexes. While they are quite obvious, I have also ranked them in order of significance.

- permitting as-of-right building types:
  currently, fourplexes in neighbourhoods, sixplexes on major streets
- removal of the Floor Space Index
- increase in building length to 19m

THE GREAT INCENTIVE: ADDITIONAL UNITS

In areas such as Parkdale and Rosedale there are historical examples of multiplex-type conversions within existing build envelopes. These multiplex 'early adopters' were responding to the housing crises of their day. Much like today, issues centred about the high cost of housing and the shortages of supply. It is noteworthy that many were undertaken within existing building envelopes, without additional FSI, and without additional building length being involved. This is not to say that there weren't addition activities associated with conversions, but rather, when you do an inspection of Parkdale and Rosedale, a substantial proportion of the traditional housing stock has maintained its original envelope prior to their conversion to units. It raises the question of why multiplexes today require an increase in building length to 19m. It would appear that permitting an increase in units beyond a simple family house, by itself, unlocks significant intensification opportunities.

HOUSE DEPTH vs LOT DEPTH

A typical Toronto house lot is not particularly wide or deep. The preponderance of residential lots in the traditional city have widths generally between 20 and 25 feet (6m to 7.6m), with lot depths often between 100 and 120 feet (30m to 36m). The ABCRA neighbourhood is a traditional part of the city, with a modern twist... it was conceived in a time without cars, an ambition many would like to return.

- Marlborough Avenue is a typical street in the ABCRA neighbourhood with average lot frontages of 4.9m and lot depths of 36m. With these dimensions earned the additional 2m length...
  The Maximum Building Depth for a duplex, triplex or fourplex is 19 metres
  if the lot has a lot depth of 36m or greater and a lot frontage of less than 10m.
  [ZB 569-2013 – 10.10.40.30(B)(i)]

The prospect of a sixplex on a 4.9m lot is somewhat grim, but it would work in the minds of some investor, meanwhile, such conversions diminish desirable family housing stock.

- Meanwhile Roxborough Street West has in comparison a greater average lot frontages of 7.6m, yet with lot depths between 46m to 48m, it does not qualify for the additional 2m in depth...
  The Maximum Building Depth for a duplex, triplex or fourplex is 19m if the lot
  has a lot depth of 40m or greater and a lot frontage of10m or greater.
  [ZB 569-2013 – 10.10.40.30(B)(ii)]

Roxborough Street fails the 19m bonus, due to its lot width, while passing on lot depth.

A SECONDARY SUITE IS NOT A MULTIPLEX UNIT

A secondary suite is not a duplex, but rather, it is subordinate to a dwelling unit. A secondary suite in a house is the most critical issue, as it is attractive to presume that it converts a house into a duplex, thereby qualifying in certain lot configurations for additional build depth to 19m. Zoning By-law 569-2013 goes to some length to dispel the the distinction. I have included the definition of a triplex and a fourplex, because the by-law makes the same distinction about the status of a secondary suite.

> ***(215) Duplex***
> *means a building that has two dwelling units, with one dwelling unit entirely or partially above the other. A detached house that has a secondary suite, is not a duplex.*
> ***(875) Triplex***
> *means a building that has three dwelling units, with at least one dwelling unit entirely or partially above another. A detached house or semi-detached house that has one or more secondary suites is not a triplex.*
> ***(265) Fourplex***
> *means a building that has four dwelling units, with at least one dwelling unit entirely or partially above another. A detached house, semi-detached house or townhouse that has one or more secondary suites is not a fourplex.*
> ***(735) Secondary Suite***
> *means self-contained living accommodation for an additional person or persons living together as a separate single housekeeping unit, in which both food preparation and sanitary facilities are provided for the exclusive use of the occupants of the suite, located in and subordinate to a dwelling unit.* ***[ZB 569-2013 – Chapter 800 Definitions]***

CHAPTER 900 EXCEPTIONS

The SCS report identifies the Chapter 900 Exceptions in Zoning By-law 569-2013 as being a challenge, however no explanation is provided. In my opinion, the Exceptions are an important instrument within the bylaw. It enables the zoning bylaw to be a generalised instrument, while the exceptions section provides specificity that is relevant on an area by area basis.

THE FOURPLEX vs SIXPLEX ISSUE

The city's later expansion, circa the interwar period, saw lot widths increase in peripheral greenfields, in part to provide private driveways. However lot depths remained relatively shallow, in order to maintain a reasonable density of lots. As a result, for many typical lot sizes, a sixplex is unlikely to exceed a sixplex. Both will keep to the maximum permitted envelope: building length and depth, as well as the minimum permitted front, rear and side yard setbacks, and maximum permitted building height. Granted, within the same envelope, unit sizes in a sixplex will be smaller than in a fourplex.

A DESIGN FOR A NEW TYPOLOGY

I question whether a fourplex or sixplex is clearly understood. Some aspects of their design appear to be over-emphasised, while other aspects are dealt with cursorily, and still others simply overlooked. It may be that larger multiplexes are an unfamiliar building typology or designers are trying to put too

much into too little, with essential features either dismissed, overlooked, or jettisoned to achieve a fit. Or perhaps applications are being submitted while the design concept is still in flux?

COMPOUNDED CONSIDERATIONS

The activity level in the sixplex will be greater than a fourplex, both in terms of the dynamics of the activities, and in terms of physical space needed, and their characteristic to accommodate those activities. In the 40 Snowdon Avenue case, there were over-emphasised interior and exterior amenity spaces. However, there was no indication that common activities had been considered, as no physical provisions were evident, nor was there any vacant space where additional facilities might be situated later on in the design's progress... a common problem of being too big.

Outdoor amenity space: While the 40 Snowdon Avenue proposal detailed its rooftop amenity level, it did not provide any details regarding the ground-level amenity space. Meanwhile, the ground level is where many activities occur and have consequences for adjacent neighbours and the street itself. The zoning standards in the low-rise residential zones, where multiplexes are now permitted as of right, were developed for very low occupancy, essentially a single-family dwelling, with the building having a smaller footprint, leaving more space to accommodate various purposes. This is no longer the case, particularly with higher numbers of units.

Bicycle storage: On larger developments, including mid-rise and tall buildings, the number of bicycles is a defined quantity, and the space is provided accordingly, with a portion being frequently accessible and the remainder being more dormant storage.

A pet concern: The number of dogs in a building relates more to the number of units rather than the number of occupants in a building. The allocation of space for a pet relief area and its location is essential, failing which green space is damaged, both on the property itself as well as nearby properties. While considered a low priority matter, the location and its facilities are critical, otherwise the dogs will establish their own routines. A useful City's publication, *Pet Friendly Design Guidelines and Best Practices for New Multi-Unit Buildings,* although it is more focused on larger projects.

Garbage management: With additional units there will be greater activity around garbage, and the need for a larger and possibly a more sophisticated garbage handling system. The placement of bins at the curb on garbage day will require a commensurately sized collection pad and where sidewalks are immediately beside the curb may require reconfiguring the sidewalk.

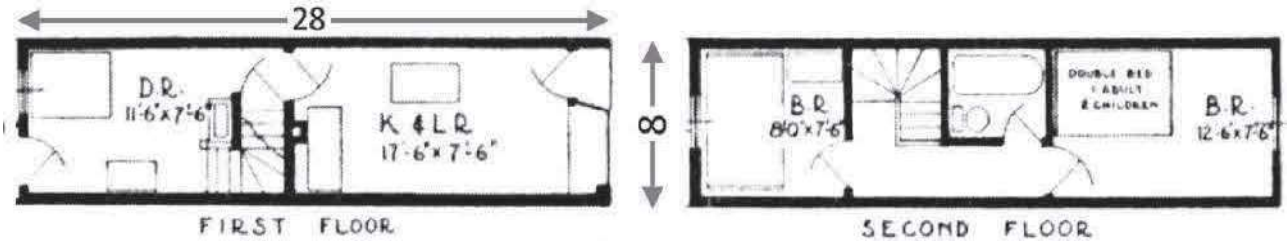
Major garbage along major streets: Major streets will experience a higher frequency of foot traffic, much of it from new clusters of multiplexes and small midrise developments emerging along the major street itself. Most of these developments will have curbside garbage pickup, involving substantial garbage pads. Complicating the situation, major streets like Lawrence Avenue have additional traffic lanes that have reduced the boulevard or verge alongside the roadway. In the little remaining edge condition, sidewalks get built immediately next to the curb. One day a week the increasing volume of foot traffic will collide with ranks of bins taking over the sidewalk.

Boulevard improvements: These are customarily agreed to as part of the the building permit process, with the boulevard improvements being part of the development's work. Likewise, when developments are undertaken adjacent to a street, it is the most opportune time to undertake changes improving the boulevards hard and soft landscape elements. And if these

works are not done at that time, then they are unlikely to get a second chance.

Transportation concerns: The more people living in separate units, results in a greater number of transportation routines being generated. Drop-offs and pick-ups by car, taxis, Uber, Wheel-Trans etc. Friends, couriers, service people, tradesmen etc. The frequency at times can be chaotic, and better handle by having an intelligent arrangement that accommodates the broadest array of situation with reason.

TORONTO, NO STRANGER TO HOUSING CRISES



Toronto is no stranger to housing crises. The city's past has been a longstanding challenge, dealing with the need for affordable housing of suitable condition and in adequate supply. In the early 1900s, some of Toronto's housing stock was so deplorable that there was a determined initiative just to get rid of the Ward district. The plan above portrays a pre-1900 house-type that could be found in the Ward: a two-storey house with two bedrooms, having a GFA of 42m^2 on a 2.5m wide lot. The width of the house appears to be determined by the length of a bed, and the stairway is equally remarkable.

TWO-FAMILY DWELLINGS

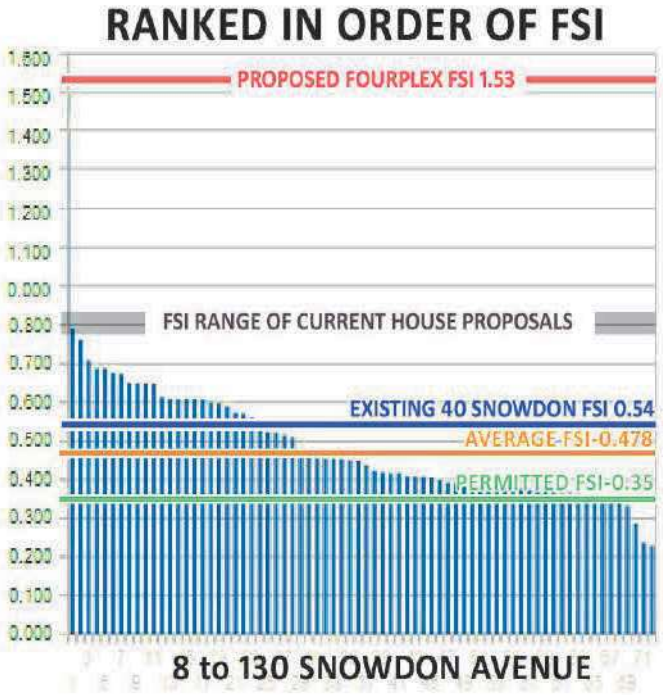
The *two-family dwelling* was one of the most successful housing initiative. World War I brought substantial population growth with war workers, followed thereafter with a wave of returning troops. In 1920, the postwar recovery saw the refinement of rooming house standards that simply converted an existing house into a *two-family dwelling*, adding another kitchen(s) while maintaining the home's open plan. As a result, no additional fire prevention measures were required as occupants had the full run of the house, fires could not evolve behind locked doors, as in duplexes etc. Today, dispersed throughout the city's traditional neighbourhoods one can expect to encounter remnants of second kitchens in unchanged houses. In its day, the *two-family dwellings* was Toronto's affordable housing stock. It substantially disappeared with the gentrification of the city's traditional neighbourhoods.

CMHC: 67 HOMES FOR CANADIANS

CMHC's *67 Homes for Canadians* is another significant initiative that dealt with the post-WWII housing crisis. CMHC developed a program to help Canadians build their home, or to have someone else built it for them. The program involved the production of contemporary home designs, complete with construction drawings that could be bought for $10, which included a list of all materials required, along with a CMHC mortgage. CMHC set up a design competition run by the various architectural associations across Canada. The most appropriate submissions were published as *67 Homes for Canadians.* The CMHC initiative in effect enabled an extensive peer review of design trends and good practices, complete with building outcome models. In my opinion, it would be worthwhile to undertake a similar exercise, as we are in the initial stages of filling in the missing middle.

EXAMPLE: 40 SNOWDON AVENUE

My primary focus is on larger multiplexes on their impacts on surroundings. The 40 Snowdon Avenue fourplex proposal is a useful example. It has been controversial, resulting in 90 letters of objection. It was refused by the CofA. The chart to the right describes the neighbourhood context. The vertical bars rank in order of size the density of all the houses within two blocks surrounding 40 Snowdon Avenue. The green bar represents the RD zone's permitted FSI of 0.35. The brown bar represents the average density of the existing buildings within the two blocks. The blue bar represents the density of the existing house at 40 Snowdon Avenue. The grey band represents the density range for a replacement house currently being assessed. The red bar at the top represents the density of the fourplex proposed for 40 Snowdon Avenue.



40 SNOWDON AVENUE DENSITY

- The current house at 40 Snowdon Avenue is two-storey solid brick, having an FSI of 0.54.
- If converted into a duplex, the existing house could accommodate two 90m^2 units, and a secondary suite in the basement.
- If replaced as a new detached house, it would range somewhere between FSI 0.75 to FSI 0.85. A new detached house within that FSI range is currently being assessed just four doors away.
- The proposed fourplex for 40 Snowdon Avenue had an FSI of 1.54, approximately 90% larger again than the detached house proposed a few doors away between FSI 0.75 to FSI 0.85.
- However, the proposed fourplex surpassed an as-of-right solution, requiring variances from the CofA dealing with building height, building depth, and front and rear main wall heights.
- There were 90 letters of objection indicating the neighbourhoods level of concern.
- The CofA refused the variances, and the proposal is re-emerging as an as-of-right solution.

CRAYONING OUTSIDE THE LINES

With the multiplex standards being newly established, it is difficult to 'crayon outside the lines' expecting that variations will be granted. The notion that a multiplex need not have regard for the prevailing built form in the neighbourhood is dashed in the 1090 Kipling Avenue TLAB Decision rendered by Panel Member Gallaugher, concerning a pair of sixplexes, in which he stated:

> *"I am not persuaded... that OPA 649 completely supersedes Policy 4.1.5 of the Official Plan (OP). OPA 649 still requires multiplex development to "maintain the low-rise built form of each geographic neighbourhood". Although it lists some criteria which should be observed "in particular," I find that it does not mandate the elimination of consideration of the other criteria in the main OP, such as respecting and reinforcing prevailing heights, massing, scale,*

density … of nearby residential properties" I interpret this to mean that multiplexes are to be given more latitude regarding conformity to the existing scale of development than single detached houses but that such proposals should still have regard for the prevailing built form in the area." ***[TLAB 24 132613 WET 02 MV (A0157/24EYK)]***

The 40 Snowdon Avenue proposal compared to the SCS test models: ***[SCS 39-40]***

- The 40 Snowdon Avenue has a frontage of 9.14m and a depth of 38.1m, placing it between the SCS Mid-width and Narrow design test models.
- While the SCS Mid-width example is 1.0m wider than 40 Snowdon Avenue, it has a driveway accessing two rear parking spaces, reducing the building's width to that 40 Snowdon Avenue.
- The basements in all three examples (40 and SCS) provided basement walkout wells.
- The SCS models each had one large unit at 120m^2, with 4-5 smaller units at around 50-60m^2.
- The 40 Snowdon Avenue proposal had four units averaging 110m^2, each taking up a whole floor level.
- The 40 Snowdon Avenue's design had some features akin to an apartment building:
  - the entire basement level was fitted out as an indoor amenity space;
  - the roof landscaped as an outdoor amenity area;
  - there were two stairways one internal at the front, and an external stair tower at the rear.
    - the rear stairway encroached into the rear yard and rose four-storeys above ground..
    - to have incorporated the rear exterior stairway within the main walls would have consumed gross floor area that was allocated to the residential units.

Again when we are counting the number of dwelling units created, it needs to be kept in mind the number of dwelling units that have been demolished in the process. In the case of 40 Snowdon Avenue, four units would be created at the loss of a house, or the loss of the opportunity to undertake a duplex conversion and the inclusion of a secondary suite. The two duplex units would be smaller and more affordable than the $2million dollar units that the developer had proposed.

ACTIVE vs PASSIVE STRATA

A significant problem arises when intermixing multiplexes with houses resulting from conflicting functions on the same stratum. In a house, the active stratum is the main level that accommodates living, dining, cooking, and group social activities, while the upper strata accommodate sleeping, studying and passive leisure, where quiet enjoyment is at a premium. Whereas, in a multiplex active and passive routines are accommodated on all levels. This is especially contentious in the warmer months when windows are left open to catch breezes and provide cool comforts, while at the same time, others immediately next door in an upper multiplex unit may choose to shift their socializing to their outdoor living area.

Immediately below, is the RD zone balcony extract that restricts houses from having any balcony above the main floor that is larger than 4m^2 and no more than one balcony on each side of a house. Meanwhile, the multiplex section of the zoning standard makes no mention of any limitation on balcony size, and states that multiplex units may have two balconies, one on the front elevation and another on the rear.

10.20.40.50 Decks, Platforms and Amenities

(1) Platforms at or Above the Second Storey of a Detached House
In the RD zone, a platform such as a deck or balcony with access from the second storey or above of a detached house must comply with the following:
(A) there may be no more than a total of four platforms, and no more than one on each of the front, rear and each side of the detached house; and
(B) the maximum area of each platform is 4.0 square metres.

(3) Platforms at or Above the Second Storey of a Duplex, Triplex or Fourplex
In the RD zone, platforms such as a deck or balcony, with access from the second storey or above of a duplex, triplex or fourplex must comply with the following:
(A) there may be no more than a total of 2 platforms for each dwelling unit, and no more than one on each of the front and rear sides of the dwelling unit;

Furthermore, 40 Snowdon Avenue had proposed a roof deck amenity area with seating for sixteen people, along with a multi-seat hottub, two hotel-style BBQs. Such an outdoor space in fine weather will attract significant activity involving tenants and their guests. This is especially true on evenings and throughout weekends. These are times when neighbours put their children to bed with windows open to enjoy the breezes, and as well parents look to their own quiet enjoyment. My comments wend back to the longstanding provision... *the maximum area of each platform is 4.0 square metres*.

TRUTHING ZONING STANDARDS

The multiplex standards have been inserted rather abruptly into the low-rise zones: R, RD, RS, RT and RM, without much consideration of whether the existing standards require attention. We did see some attention to the area requirements of upper balconies, as I mention above. The bylaw specifies a limitation on balcony sizes for detached houses, which is a carryover from before multiplexes were introduced, and then it proceeds to cite balcony standards for multiplexes without any mention of balcony sizes. So there is a differentiation there. In another instance, the bylaw specifies the side yard setbacks by the different building typologies when it itemises the “R” Residential standard, while in the “RD” Residential Detached section the standards are not differentiated by different building typologies, instead they are all dealt with as one. ***[ZB 569-2013]***

So far so good... Then we encounter in both the 40 Snowdon Avenue proposal and in the SCS's design test models, where there are basement walkout wells that extend across the entire rear main wall. The zoning standard states that in this case a side yard setback is to include the vertical distance between the first floor (and not the established grade but) the average elevation of the ground along the building's rear main wall, which in these cases is at the base of the well. ***[SCS 39-40]***

10.5.40.60 Permitted Encroachments

(D) in a rear yard, a platform with a floor higher than the first storey of the building above established grade may encroach into the required rear yard setback the lesser of 1.5 metres or 50% of the required rear yard setback, if it is no closer to a side lot line than the required side yard setback plus the vertical distance between the first floor of the building and the average elevation of the ground along the building's rear main wall;

IN CONCLUSION

NASA showed Buckminster Fuller what they said a spaceship would be like in 50 years. To which, Fuller replied, “It won't look like that... as otherwise you would have built it already. That thought comes to mind occasionally as I have been working through this *Sixplex City-wide Study.*

Sixplex typology: There appears to be a lot of attention focused on specific parts of the matter, and less in others through to nothing in others. It is of interest to note that the definition of apartment buildings, (which have always been permitted in the R zone), was revised when the four-story multiplex was adopted. That revision took fourplexes out of the purview of apartment buildings and the multiplex building typology was created. I expect, just as the Midrise and the Tall building typologies were established and then underwent years of fine-tuning, we can expect a similar period of adjustment with multiplexes. The SCS exercise is just a part of a longer more extensive process.

Envisioning the future: At this time it is difficult to envision the future prospect for sixplexes along major streets, and more particularly sixplexes within neighbourhoods. So far the 222 samples indicate a somewhat similar geographic uptake as with laneway houses, albeit dependant upon where there are lanes. Likewise, there is an indication of a similar uptake as with garden suites. Again, the sixplex mapping indicates a focus in the traditional area of the city of Toronto and its early westward evolution. Much of the traditional city was founded on tight lots, in part looking to provide housing within walkable distances. The smaller lots generate a smaller envelope, and as I have mentioned the different number of units in a multiplex, whether they be four, five or six unit building types, in many cases these typologies will all be within the same envelope. Only the unit sizes will be different.

City-wide distribution? The prospects of distributing city-wide the higher density that multiplexes make possible is in my opinion hazy at best. As for the experiment of permitting sixplexes in Ward 23, the results so far are not statistical relevant. For more than fifty years, I've observed with a critical eye urban patterns and trends. I will place my bets on a greater population intensification in a broader uptake of smaller units, duplexes, triplexes and fourplexes; than in fiveplexes and sixplexes. As for the distribution of the fiveplexes and sixplexes, I think they will have difficulties in the traditional parts of the city due small lot sizes, and again difficulty in the outlying parts of the city. The missing middle for sixplexes may be in the middle ring, between the centre and the peripheral regions. And then the question within neighbourhoods, the question is what percentage of lots within each block will take on a sixplex?

Regulatory and informative: I don't see zoning standards as merely being regulatory. Many refer to them for their informative value. To establish the sixplex as a city-wide zoning standard is misleading. There are many property types that cannot accommodate such intensification, and many in fact have difficulty with fourplexes. Marlborough Avenue with its average lot width of 4.9m, is a good example of a street whose houses are incapable of appropriately accommodating sixplexes, even considering the 2m building depth bonus to 19m that is granted to this lot type. That in itself suggests that the number of units that can be accommodated in a building proposal can be related to lot types.

Marlborough Avenue: This street would be better served if a reasonable unit count were establish, based upon a check list of features to be incorporated into any concept. At a minimum such an approach would avoid designs that exceed their envelope, or situations where practical features are ignored either by intention or by oversight. The zoning bylaw is set up to do fine-tuning with

neighbourhoods by means of the 900 Exceptions section. Rosedale, is worth looking at as an example, as extensive use has been made with the 900 Exceptions section, and most of the information pertains to multiple units being established.

This concludes my comments.

Sincerely

Terry Mills B.ARCH RPP MCIP

ARRIS Strategy Studio
801 - 101 Roehampton Ave
Toronto M4P 2W2
647 330 9061
TMills@ARRIS.ca

NOT ALL LOTS ARE EQUAL

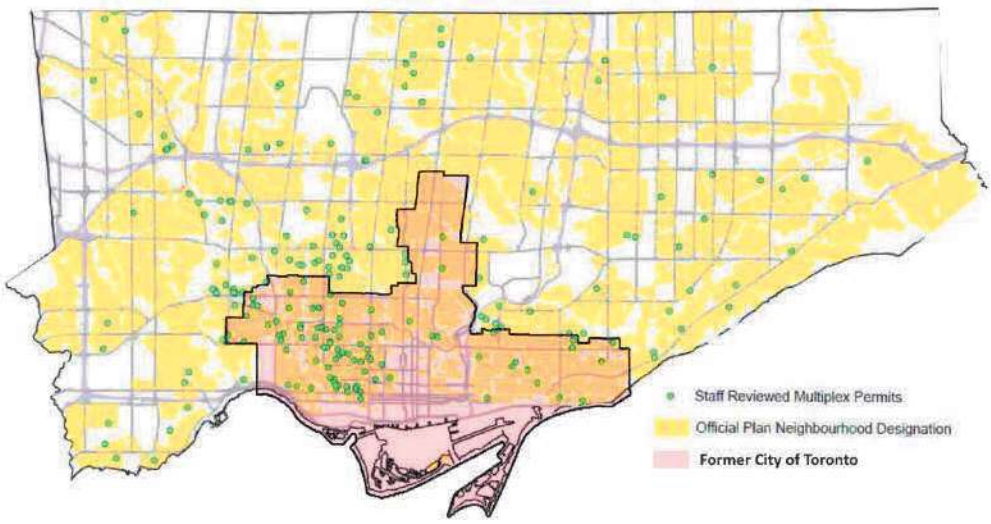
To declare *"Six-plexes would be permitted in all neighbourhoods"* is to misinform many of Toronto's residential property owners. Many lots are incapable of accommodating a Six-plex and this needs to be clarified. In my opinion, the zoning by-law is not only regulatory but also informative, providing guidance as to what can be accomplished on various lot configurations. Such an approach is no different than the Building Depth standards in ZB 569-2013 such as: *10.10.40.30(B)(i) and (ii),* which spell out the different lot configurations where additional building length is permitted. Similarly, the number of multiplex units could be spelled out for different lots types.

The distribution of the multiplex case studies indicates the majority have occurred in the inner city, similar to Laneway Suites and Garden Suites. The inner city is attractive to intensification initiatives, meanwhile, the area has a regimentation in the lottage profile to consider. The City's 1996 planning report *"Preserving Neighbourhood Streetscapes"* provides an insightful breakdown of residential lot widths. The figures were compiled for pre-amalgamation Toronto. By 1996 much of the inner-city's lottage pattern had crystallised. The accumulation of new lots in the inner- city has been relatively marginal. Furthermore, new lots in the inner-city generally have similar proportions to the former lot patterns, resulting in little change to the overall lottage profile.

6.1m (20ft) or less	46%
6.11m to 7.61m (20ft to 25ft)	14%
7.62m to 9.14m (25ft to 30ft)	21%
9.15m (30ft) and over	19%
TOTAL	100%

Almost half (46%) of all the lots in the former city are 6.1m (20ft) wide or less. One unit per floor, plus a secondary suite would be most appropriate while accommodating the associated facilities, amenities and OBC standards for multiplexes. A further 35% of all the lots in the former city are 9.14m (30ft) wide or less. The widths involved are still too narrow to accommodate more than one unit 'per building face per floor'. Bachelor units may be mixed with larger units, but subletting a second bedroom within a unit may be a more feasible and desirable.

The remaining 19% of inner-city lots are wide enough to accommodate side-by-side units per floor. This last category is truly the Six-plex's domain.

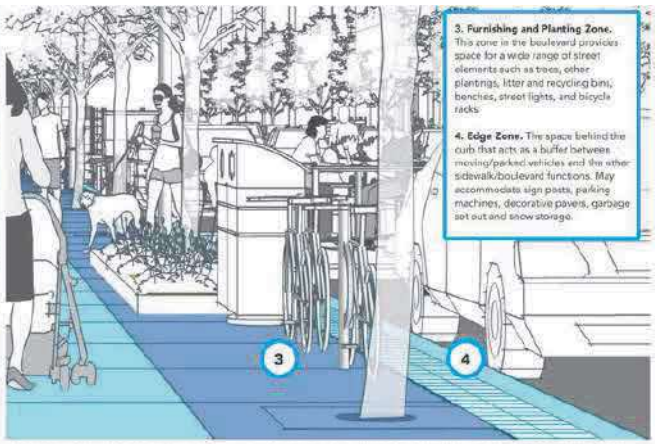


EXTENDING AVENUES

Additional Avenues have been recently designated. Formerly, these were major streets, some of which ran through Neighbourhoods. I will focus my remarks on Lawrence Avenue west of the Don Valley. As a major street, it carries significant volumes of traffic. To accommodate the additional vehicle lanes, the roadbed was widened by reducing the width of the boulevards on each side.

The photo below shows the south sidewalk immediately abutting the curb. The telephone pole in the middle of the footpath confirms that the road was widening after the pole was installed, as was typical practice at the time. The overall distance between the curb and the property line is 4.9m. Meanwhile, the diagram below and to the right shows a verge, setting the sidewalk back from the curb, and the separation accommodating trees, plantings, bicycle racks, waste containers and pavers.

LAWRENCE AVENUE TODAY - WITH SIDEWALK AT CURB



COMPLETE STREETS - VERGE WITH SETBACK SIDEWALK

Because side streets have narrower roadbeds, they often have wider boulevards. Sidewalks are generally set back from the curb, and the space between the curb and the sidewalk is usually treated with soft landscaping. This area is also used for utilities, such as bus stops, signposts, utility poles, and garbage bins. In the winter, this setback edge provides space for snow removal purposes without encumbering the sidewalk.

LAWRENCE AVENUE'S PROSPECT

Lawrence Avenue is presently sleeved with 'R' and 'RD' zones, except at the Yonge Street, Avenue Road, and Bathurst Street crossroads. These residential zones are being considered for Six-plexes. Just as development pressures are likely to lead to intensification initiatives transforming the houses lining Lawrence Avenue, further pressures from the industry are likely to shift development towards mid-rise building forms. In other words, we can expect substantial increases in foot traffic on the sidewalks, as well as large clusters of garbage bins on garbage days.
The primary reason for relocating the footpath back from the curb is because the juxtaposition of pedestrians immediately next to the curb on a thoroughfare is not a safe proposition.
To accomplish the sidewalk relocation requires an incremental strategy, where each development, as it occurs, adopts the street plan and contributes towards the cost, on the understanding that the reconfiguration will occur on a block-by-block or part-by-part basis. This is similar to how, for instance, Roehampton's sidewalks and landscaping have evolved, and continue to evolve.