City claims that	since singles, s	semis, and towns	are ground oriented	housing, ar	nd since the 61	3 flats can be gro	und oriented hou	ising, then some	how they are			
equivalent in te	rms of housing	form and market	demand.									
COMPARISON												
Singles, Semis,	Townhomes		613 Flats									
Ownership:												
- most often simple freehold, or part of			- most likely to be 3 unit condominium									
larger condominium			(City claim of freehold is untested and unproven)									
Market demand	•											
- larger floor areas		- areas will be smalle	:r									
- private garage			- no garages									
- private drivewa	y		- no driveways in mo	st cases, or s	hared							
- private amenity space			- no private space - common area will have to accommodate garbage and recycling bins etc									
- parking for 2 cars, room for visitors			- no parking in most cases, and none for visitors									
- consistent strong market demand for these forms			- city admits no existing market demand, as form does not exist									
Servicing / Cons	structability											
- rarely any issues		- sanitary capacity is	sues in inner	city likely								
-generally constr mutiple houses a allows health and shared across a	it one time (produ d safety responsi	uction site). This bilities to be	- storm water manag	ement on site	will be needed							
			- OP protection of existing trees makes most sites unable to accommodate new larger footprints									
			-would require one health and safety lead on each job site, not condusive to production housing model, especially as infil									
Cost / Affordabi	lity											
- predictable cos	ting		- highly volatile in terms of land supply, due to uncertainty and market forces									
			- costs on individual sites could be very high as a specific problem is spread over only 3 units									
			- our assessment indicates a likely selling price of close to \$1M per unit for a 613 flat									
General												
- city examples o	f 613 fl ats showr	on 60 and 100 fo	ot wide lots, which are	not common	in the inner city							
- city claim that "	more housing ch	oice at affordab l e p	orice points" is comple	tely unfounde	ed							
- city relying on 1	% of inner city lo	ots "turnover" mea	ning demolition and re	building 2 to	4 units in place	of 1, notwithstandi	ng community opp	osition and unpro	ven demand			
- city relying on in	ncrease in lot turr	nover from 0.19%-	0.35%/year dependin	on R zoning	outside the ma	ture neighbourhoo	d overlay to 0.80%	/year				
			as or more than a sin 0,000, it could be torn								nt in a mature ne	eighbourhood
			hey have a lot of flag			•				,		