

From: [Chris Robinson](#)
To: [Planning and Housing](#)
Cc: [Ene Underwood](#)
Subject: PH28.1 and PH28.4 - Written Deputations
Date: October 27, 2021 7:56:17 PM
Attachments: [PH28.4. Ownership Definition - Ene Underwood - Habitat GTA - Oct 28 2021.pdf](#)
[PH28.1. Inclusionary Zoning - Ene Underwood - Habitat GTA - Oct 28 2021.pdf](#)

Good evening,

Please find attached the written deputations to accompany the in-person deputation that Ene Underwood, CEO of Habitat GTA will provide on items Ph28.1 and Ph28.4.

Thank you,
Chris

Chris Robinson

Manager, Strategy & Policy
Habitat for Humanity Greater Toronto Area
155 Bermondsey Road, Toronto ON M4A 1X9
T: (416) 755-7353 ext. 2281 • F: (416) 916-2333

habitatgta.ca

Building strength, stability and self-reliance through affordable homeownership.

This electronic transmission is intended solely for the addressee indicated above or an authorized recipient. It may contain information that is privileged, confidential or otherwise protected from disclosure. Any review, dissemination, or use of this electronic transmission or its contents by persons other than the addressee is strictly prohibited. If you have received this electronic transmission in error, please notify the sender immediately by telephone and delete the electronic transmission without making a copy.



Habitat
for Humanity®
Greater Toronto Area

Brampton, Caledon,
Durham Region, Toronto
& York Region

City of Toronto Audit Committee

October 28, 2021

PH28.4

Official Plan Amendment on Definitions of Affordable Rental and Ownership Housing

Habitat for Humanity GTA has been partnering with the City of Toronto since 1988 to help working, lower income families realize the strength, stability and self-reliance of affordable homeownership. We are pleased to support the proposed Official Plan amendments to the definition of affordable ownership housing.

We had been concerned that earlier calculations overlooked some key factors and were resulting in price points that were too high. We found City staff to be responsive to the concerns and suggestions we raised. We are supportive of the resulting definition.

In expressing this support, we wish to underscore two important related points:

1. HST, LTT and Property Taxes Must Be Reflective of the Defined Valuation of these Homes

The price points for the proposed affordable ownership definitions have been calculated based on the assumption that Land Transfer Tax (LTT), HST and property tax on these units will be based on the calculated valuation of these units *not on their market value*.

It is imperative that the City stay the course on ensuring that this is what actually happens with LTT, HST and property taxes.

These units can never be sold on the open market. There is a strict formula for their resale. Thus, it is neither fair, nor economic for the lower income owners of these affordable ownership units to bear the costs of HST and property taxes based on market valuations of their units.

2. A solution will be required for condo fees in higher-end units provided through Inclusionary Zoning

Inclusionary Zoning will result in units in all new developments – with only limited flexibility for off-site units. This is great for inclusion but presents challenges for affordability.

While condo fees are included in the calculation to determine initial purchase price, they have a propensity to rise. We can imagine that most lower income families would not choose to live in a

building with a swimming pool, gym, elegant lobby and other amenities if it meant they would be paying a large chunk of their monthly income on condo fees.

Current condo legislation provides limited flexibility for differentiating the condo fees paid by one group of owners versus another. Thus, there may need to be future workarounds for reductions in property taxes of other solutions such that as condo fees rise, it will not put unnecessary pressure on families who thought they were buying a home they could afford to live in.