



Building in
Brampton, Caledon,
Toronto & York Region.



ARTSCAPE



February 23, 2016

To the Attention of:

Nancy Martins

Planning and Growth Management Committee Secretariat

10th floor, West Tower, City Hall

100 Queen Street West

Toronto, ON M5H 2N2

**Re: PG10.2 Official Plan Five Year Review: Public Consultation and Implementation Regarding
Amendment to Affordable Ownership Housing Definition**

Dear Councillor Shiner and Members of the Planning and Growth Management Committee:

Together Artscape, Kehilla Residential Programme, Options for Homes, and Habitat for Humanity Greater Toronto Area appreciate the opportunity to provide feedback on the proposed changes to the Affordable Ownership Housing definition in the Official Plan. We recognize that significant work has been done to date, and we applaud the City's effort to support our shared goal of stimulating affordable ownership housing development. We do, however, have a couple of material concerns that we feel require further clarity and discussion in order to make sure the proposed definition is fully reflective of our different models of ownership delivery.

We respectfully request that your committee not adopt the staff recommendations at this time. We request that you refer the matter back to staff for additional consultation with affordable ownership providers and that the matter be brought back before this committee at the next appropriate opportunity.

As noted in the report a key objective in revisiting the Affordable Ownership Housing definition is to encourage the development of units that are not being readily constructed by the market (p.10). Since 2012 (the year initial direction was given to staff to review the Official Plan definition) the not-for-profit sector, through creative partnerships with market developers and as standalone developer/builders, has produced 766 affordable ownership units and as a group of providers we have a further 1647 units in our respective pipelines. A new Official Plan definition should have the goal of stimulating the traditional housing market to produce affordable units, however, it must not do this at the cost of inhibiting the existing and future capacity of the not-for-profit sector.

As affordable ownership housing developers, we have been in dialogue to discuss our understandings of the proposed definition's implications. While there are a number of aspects of the proposed definition that we appreciate, we have concerns about the ambiguity of the proposed definition and how the proposed definition will be implemented. By its own admission the report raises a number of issues requiring clarification including: the administration and ongoing operation of the project; type of



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support offered to homeowners; the degree of oversight provided; the means for controlling resale prices; compliance with and timing of other conditions of planning approval; and, whether any obligations will be transferred to other parties. We would like to understand better these associated issues before we can support this definition.

Furthermore, there are specific questions and concerns raised through the consultation process that remain unanswered. For example, how were the unit prices in Attachment 3 of the report calculated? How and for what purpose will these unit prices be used? And, can there be some consideration given to the difference in land values across the city when generating the unit prices? It is our strong recommendation that there be a third party review of the unit values outlined in Attachment 3.

Finally, it remains unclear: 1) the potential interrelationship between the proposed definition and the existing programs run through the Affordable Housing Office; 2) qualification for new programs created as part of the Open Door initiative; 3) qualification and access to city surplus lands; and 4) future partnerships with city agencies such as Build Toronto. Accordingly, we need to better understand this definition and its implementation to ensure it will not undermine our ability to deliver affordable ownership units.

As such, we respectfully request that item PG10.2 be referred back to staff for further targeted consultation with affordable ownership housing providers. We are committed to making time to meet with staff within the next month and recommend that the special statutory meeting be rescheduled accordingly, in order to allow for this consultation. We believe this additional time is essential for achieving an Official Plan definition that enables us to continue using our proven models for delivering affordable ownership units to meet the City's housing needs.

Sincerely,

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