

November 16, 2017

BY EMAIL TO lsc@toronto.ca

Licensing and Standards Committee
10th Floor, West Tower, City Hall
100 Queen St. West
Toronto, Ontario M5H 2N2

Dear Chair and Committee members,

Re: Licensing and Registration Regulations for Short-Term Rentals-Item LS23.1

We are writing to express our support for the recommendation of the Executive Director, Municipal Licensing and Standards that a short-term rental by-law be adopted as detailed in her report of November 14, 2017. We would, however, recommend that there be one change to the information requirements for registration of short-term rental operators.

It is important to us that only principal residences be eligible for the special treatment that this by-law provides. Clearly it is important to Municipal Licensing and Standards as evidenced by paragraph 5a of the recommendation which states:

“No operator shall rent or advertise for rent a short-term rental except at their principal residence”

However, evidence that the registered property is the operator’s principal residence is only required by paragraph 5c on request from Municipal Licensing and Standards, presumably after questions have arisen as to compliance. We do not believe that this is sufficient.

We propose that the requirement of evidence that the registered property is the operator’s principal residence be part of the information required for registration under paragraph 3 of the Recommendation. People should be permitted to do what they like in their homes as long as it does not interfere with the rights of others, but the protection of rental housing units is a significant concern that the City’s registration process should support. We believe that this change would assist in addressing that concern.

Yours very truly,

Advocacy Centre for Tenants Ontario

per:



Kenneth Hale

Director of Advocacy and Legal Services