

November 13, 2017

Members of the Planning and Growth Management Committee
Toronto City Hall
100 Queen St. West
Toronto, ON M5H 2N2

Via email: pgmc@toronto.ca

Dear Members of the Planning and Growth Management Committee,

On behalf of the members of the Greater Toronto Hotel Association (GTHA) and the Ontario Restaurant Hotel and Motel Association (ORHMA) I am writing regarding the Agenda item **PG24.8: Zoning By-law and Zoning By-law Amendments to Permit Short-term Rentals** on the City of Toronto Planning and Growth Management Committee meeting for November 15, 2017.

The GTHA and ORHMA support the creation of a new land use short-term rental "which requires the use to be the principal residence of the operator". However the new definition of short-term rentals does not achieve the desired outcomes without the definition of principal residence.

The proof of principal residence requirement of home sharing is not up for discussion at the Planning and Growth Committee, however it is such an important component and the foundation of the overall home sharing report that it is too important not to comment on.

In the report LS23.1 to Municipal Licensing & Standards Committee there is a recommendation that proof of principal residence registration for the short term rental operator is a simple check the box. No proof required upon registration. This simple registration will undermine the integrity of the registration process and cause the City significant challenges in the future. It will take more time to go back and correct the system after than to do it right in the first place.

The GTHA and ORHMA recommend a registration process that requires a system that is simple and expect the City uses in other areas of city responsibilities. A simple ask for identification that shows principle residence may be a valid driver's license, province issued ID card, electricity bill, property tax bill, natural gas or cable bill. This is not onerous on the home sharing operator and may still be completed online. This simple step will provide all involved with a system with a stronger foundation than proposed.

The issue of secondary suites is one that is addressed in the report. A recent change has placed a limit on the number of secondary suites that can be used for short term rentals to a maximum of one lawful suite.

The GTHA and ORHMA are recommending a different approach that allows "only secondary suites that are permitted by city zoning bylaws and that comply with Building Code and Fire Code requirements be permitted for short-term rental use". To support the City's long term housing objective we recommend that the City does not allow any new secondary suites to be constructed for the purposes of short-term rentals in the City of Toronto however all new secondary suites constructed would be for the long term housing market.

The City of Toronto's Economic Development Committee report titled *Ensuring a Robust hotel supply to strengthen tourism ED. 25.5*, highlights that "ten neighbourhoods with the most listings were all downtown and represented half

of all listings (53%) rented in 2016". The report as well discusses some of the challenges in growing hotel room inventory over the past decade and looks towards opportunities to cure that in the future. The report states that *"another factor that may be affecting hotel supply is the increase in short term rentals that have grown exponentially since 2010."* Clearly the increase in the home sharing economy has contributed to some challenges to investment in the hotel sector.

The GTHA and ORHMA recommend that the City planning department review the issue of the density of home sharing in the ten neighborhoods listed in the report above and provide advice on how more of the listings become long term rentals to assist with the City's housing challenge.

Thank you for the opportunity to provide input into the home sharing economy consultation process.

Regards,



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Greater Toronto Hotel Association
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Regards,



Tony Elenis
President & CEO
Ontario Restaurant Hotel & Motel Association