



Housing Action Now
 2 Carlton St., Suite 1001
 Toronto, Ontario M5B 1J3
 Phone: 416-366-4384
 E-mail: me@melissagoldstein.com

Housing Action Now
Feedback on the Zoning By-Law and Zoning By-law Amendments to Permit Short-term Rentals
Wednesday, November 15, 2017

To the members of the Planning & Growth Management Committee,

Housing Action Now (HAN) is a coalition of Toronto residents and community organizations that advocates for safe, decent and affordable housing for all Torontonians.

Overall, Housing Action Now supports regulating short-term rentals in the interest of protecting both the City's supply of long-term rental housing, and the affordability rental housing across the city. The City's rental vacancy rate is notoriously low and Torontonians across the City are finding it so difficult to find places to live that they can afford, that homelessness continues to rise, young people can't afford to move out of their parents' homes, and people across the city have so few options that they end up stuck in unpleasant and unsafe living situations. The rise of short-term rentals is worsening this already bad situation by taking long-term rental units out of the rental market and by increasing the value of rental properties in particular neighbourhoods, thereby further inflating rents. On top of this, the conversion of long-term rental units to short-term rental units is resulting in the (often illegal) eviction of Torontonians from their homes: low-income people, students, and families are being forced out of their homes and into the cut-throat rental housing market in favour of high-paying tourists.

While the City's proposed regulatory framework is an excellent start, there one significant issue with the zoning aspect of the by-law that must be addressed:

Short-term rental operators should not be permitted to rent out secondary suites.

Short-term rental operators should be limited to renting out their principal residence. The short-term rental of secondary suites seriously undermines the City's goal of protecting long-term rental housing stock in two ways:

First, rental of secondary suites make up a significant portion of the City's rental market, especially in the most desirable neighbourhoods in the City, and it is these neighbourhoods which are most at risk of short-term rental conversion and require protection by this by-law.

Second, it will undermine the possibility of effectively enforcing the proposed principal residence requirement, as it will be difficult for an operator to provide documentation that will reliably prove their legally entitled to rent out a secondary suite. And without effective enforcement, the regulations won't function to preserve long-term rental stock or affordability.

Eliminating the short-term rental of secondary suites does not stop people from generating income from those suites or stop tourists from having a diversity of accommodations options; it simply imposes the more balanced situation that existed in Toronto prior to the arrival of Airbnb, where property owners could earn rental income from their properties and Torontonians had a better chance of finding somewhere in the city to live.

Allowing the short-term rental of primary residences alone maximizes the housing potential of Toronto's housing by encouraging people to not leave their homes vacant even for short periods of time, while preserving the city's critically important stock of long-term rental housing, allowing property owners and tenants to supplement their incomes and pay off mortgages by earning rental income, and ensuring tourists have a range of accommodations options. It's a good solution for everyone.

Melissa Goldstein,
 Chair, Housing Action Now