



November 14, 2017

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

Sent by email to: [pgmc@toronto.ca](mailto:pgmc@toronto.ca)

**Re: Notes to City of Toronto Planning Meeting Agenda item PG24.8:**

Dear Members of the Planning and Growth Management Committee,

From our reading of the proposed amendments in Agenda item PG24.08 we as representatives of an impacted company and as individuals feel that the restriction to primary residents represents a difficult and legally awkward impairment to property owner's rights and an undue challenge to our business operations. Below are some points that summarise this position.

A family home rental is not a comparable market offering to Hotels and B&B's. Unlike a condo rental or hotel families on corporate assignment, vacation, or in town for one of the many services offerings unique to Toronto such as hospital visits cannot offer the full range of at home kitchen, dining, and family time to visitors as a home does.

Market diversity provided by this product offering is a strength and boon to the city. Tourism is a large focus today for any city. Toronto tourism and business visitors are becoming savvier and there are many cities competing for the same dollars. Short term rental booking solutions provide a distinct incentive to choose Toronto as a destination.

Regulation is definitely called for. However, some of the suggested regulations offer only impediments to owners' rights to use their property as they wish. This prunes the common law we all trust in unclear ways. While our company is not in a position to fund legal research in this area or hire lobbyists we have had similar concerns raised by our clients.

The research gathered by and made available by the council suggests that communities care strongly about subletting activities by non-owners and care far less about whether someone files their taxes at a particular address.

Some of the public perception short term rental services have garnered is based upon worst case scenarios and 'nimbyism' then actual cases. We feel strongly that having a professional company vetting guests removes both the perception of potential disruptive guests and can tangibly be held to account for ensuring the city regulations, fire codes, and other new rules are adhered to.

We feel firmly that it is better that a home is monitored than sit vacant for half the year. Many people have homes in the city that that are not their primary residence as they only live in Toronto for a portion of the year. Letting a home sit vacant creates added pressure on all city services and does nothing to assist in providing housing for Torontonians.

Short Term rental of an investment property that would sell for one million plus dollars is not connected to the general housing requirements of the city. Consider that if renting a home long term is to be 30% of the average income of \$45,000, than \$1,250 per month would be available. It is clear that affordable housing would not be addressed by restrictions to the short term rental of single family homes. Contrast this to a person renting a condo and using it to generate a profit by subletting. We suggest there are different markets being address with a broad solution.

We suggest that the similar regulations implemented in communities like Niagara on the Lake and Collingwood be considered. We would be happy to walk through how Short Term Rentals are regulated successfully in other communities and assist in the creating of rules that are appropriate for Toronto while ensuring that new economic forces have the diversity needed to flourish.

Regards,

Vincent Morra

President  
TSTR Property Management  
vincent@tstrpmc.com

Regards,

Mark Dellamano

President & Owner  
NOTL Vacation Rentals  
mark@notlvacationrentals.com