



# Submission

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**To:** **All Members**  
Planning & Growth Management Committee, City of Toronto  
[pgmc@toronto.ca](mailto:pgmc@toronto.ca)

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**Attn:** **Nancy Martins, Secretariat Contact**  
Planning & Growth Management Committee, City of Toronto  
[pgmc@toronto.ca](mailto:pgmc@toronto.ca)

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**From:** **Peter Thoma, MCIP, RPP, PLE, Partner**  
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**Date:** 2017-11-15

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**Re:** **PG 24.8 Zoning By-law & Zoning By-law Amendments to Permit Short-term Rentals**

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My name is Peter Thoma, I am a partner with the Toronto based firm urbanMetrics. I am a Registered Professional Planner (RPP) and a Professional Land Economist (PLE).

I am pleased to be before the Planning & Growth Management Committee today to provide my comments and professional opinions regarding the above referenced item.

I have reviewed the City's Staff Report which outlines a series of amendments to the City's zoning by-laws that would, in effect, permit short-term rental (such as Airbnb, VBRO, etc.) in all residential and mixed-use zones across the City of Toronto.

We recognize that significant consultation and some very lively discussions have taken place. We also understand that broad-based consensus has been an ongoing challenge. Throughout the process we have heard from passionate Airbnb hosts that relish in the experience of sharing their homes (and their city) with tourists. We have heard from representatives from the hotel industry that Airbnb and other home-sharing platforms should be taxed and regulated as commercial enterprises. We have heard from hotel workers that are concerned about their jobs. We have heard from restaurateurs outside the downtown core that appreciate the bump in sales that Airbnb guests help bring to their establishments.

It is not my intent to relitigate this debate.

Nonetheless I would like to take this opportunity to provide my insights – as a professional planner, a Torontonians, and a homeowner with a vacant secondary suite.

The City’s Planning rationale for permitting short-term rentals has been based on five guiding principles. These principles include:

- the **rights of individual property owners** to make space available on short term basis;
- the need to mitigate **pricing escalations in rental housing** (affordability);
- the need to maintain **stability in communities**;
- the need to **minimize nuisances**, such as noise and garbage; and
- the need to create **diverse accommodation options** for tourists

I am very pleased that Planning Staff recognize that short-term rentals (STR) will continue to play an important, and positive role in City. I believe the direction to permit STR within all residential zones and all mixed-use zones across the City of Toronto is an important step in the right direction.

Having said that, it would appear that many of the issues covered in the Staff report transcend the normal conventions of land-use planning. As a planner, I get very uncomfortable when planning principles are predicated on regulating users and not the use. Language that speaks to “maintaining community stability” and “minimizing noise, nuisance and garbage” sounds – *and feels* – remarkably similar to NIMBY-infused discourse which so often divides communities. It is disingenuous to suggest that guests staying in short-term accommodations are fundamentally more problematic, and generate more noise, nuisance or garbage than conventional tenants or occupants.

Fact: between January 2014 and June 2017 (a period of 41 months) the City of Toronto’s Municipal Licensing and Standards received only 37 complaints about short term rentals. The nature of these complaints focused on noise (20), property standards and safety (12) and garbage (5). This amounts to about 1 complaint per month, in a city with a population of 2.7 million.

## Key Concerns:

Developing sound, defensible public policy should be predicated on an analysis of facts, not rhetoric.

In my professional opinion, the City of Toronto’s Planning Department has not been given the appropriate direction to address the implications of regulatory changes through a land use planning lens.

While the issue of short-term rentals has preoccupied multiple City departments over the past two years, the hotel industry has effectively been issued a free-pass when it comes to changes in land-use.

The City’s hotel industry has helped delude the public into thinking that Airbnb, home sharing platforms, and so-called “ghost hotels” are eroding the economic stability of the City and systematically eliminating the efforts of hard-working staff in the hotel and hospitality sector. This is simply not the case.

The Greater Toronto Airport Authority is actively planning for major growth in travel. The GTAA and its partners are preparing the infrastructure – roads, buildings, runways, on-site services to support 45 million additional passengers – which is more than double the current passenger volume handled at Pearson International Airport.

The City’s hotel industry, however is moving in precisely the opposite direction.

While it is true that some new hotels are on the books, many more properties remain under open consideration for conversion to other uses. The fact of the matter is many of Toronto’s largest hotel players have, for all intents and purposes have already “cashed out” of the City of Toronto hotel market. Over the past decade numerous hotel properties – from Etobicoke to Scarborough - have been decommissioned and reconstituted as high-rise condominiums.

According to data provided by the Toronto Hotel Association, the number of hotel rooms today in the City of Toronto is actually smaller than it was 15 years ago. This trend was already firmly established well before home-sharing platforms such as Airbnb were introduced to mainstream travellers.

If the City is going to develop land use regulations around short-term rentals the policies proposed should seek to close, not widen the gap between visitor growth and accommodations.

It is my professional opinion that that the policies proposed today do *nothing* to address the well-being of our city, *nor do they represent good planning*. I would ask this Committee to consider very closely the implications that these policies will have. They will make Toronto a less welcoming and less receptive to visitors travelling on modest budgets.

Thank-you for considering these remarks. If you have any questions or comments, please do not hesitate to contact the undersigned.

Respectfully Submitted,



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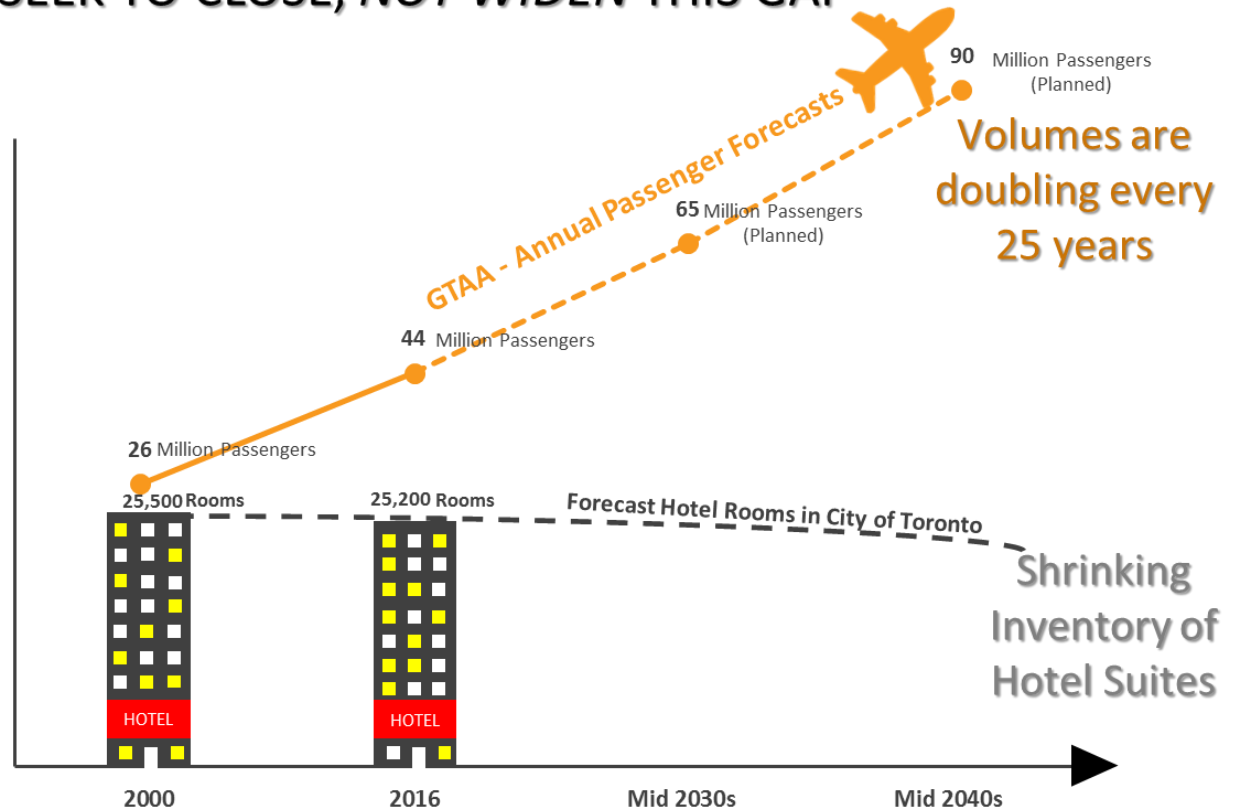
## Attachments:

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1: Proposed STR Planning Approach in The City of Toronto Should Seek to Close, Not Widen the Gap

Attachment 1

# PROPOSED PLANNING APPROACH IN THE CITY OF TORONTO SHOULD SEEK TO CLOSE, NOT WIDEN THIS GAP



**SOURCES:**

Greater Toronto Airport Authority  
 Greater Toronto Hotel Association