

January 11, 2023

To: Members of the City of Hamilton Planning Committee and City Council  
**City of Hamilton**  
71 Main Street, Hamilton

Thank you for accepting this correspondence from the REALTORS<sup>®</sup> Association of Hamilton-Burlington (RAHB). We are a 100-year-old not-for-profit organization that proudly represents nearly 3,800 local REALTOR<sup>®</sup> members. Housing policy issues such as the supply of attainable, affordable ownership and rental housing are a priority for our members. As such, we feel it is crucial to weigh in on Hamilton's investigation into short-term rental regulations.

RAHB is supportive of economic innovation and applauds the City's recent progress in making conversions, secondary suites and laneway housing easier to attain. We believe these amendments will help increase the rental housing supply and benefit homeowners. However, we are concerned about the City's proposed plan to regulate short-term rentals and its potential impact.

While we can appreciate the City's overall goal to protect the rental housing stock, there must be a fair and equitable regulatory oversight rather than restrictive and punitive regulations. In our opinion, the proposed plan to regulate short-term rentals is overly prohibitive and infringes on homeowner and property rights. In particular, we believe that limiting short-term rentals to primary residences and implementing a cap on consecutive and total annual days are unjustly proscriptive. Furthermore, by imposing these restrictions, the City risks losing jobs related to the short-term rental industry, such as property management companies. Additional potential consequences may include a reduction in federal HST collection, reduced tourism and a burden for people travelling to Hamilton for medical reasons.

These overreaching regulations also send the wrong message to investors and are contrary to the Open for Business image Hamilton has been working hard to achieve. It is unfair to those currently operating a short-term rental without issue to lose their business because of a few bad actors. The short-term rental market provides economic benefits, and as such, we are advocating for fair and equitable regulatory oversight that benefits the industry rather than eradicates it.

With regards to the pressing issue of rental housing supply, we have heard from our membership that the long wait times at the Landlord Tenant Board are discouraging would-be landlords from offering long-term rentals. Many landlords have faced financially detrimental situations caused by long delays. We suggest that some of the City's efforts to increase rental supply go toward working with the province to increase capacity at the Landlord Tenant Board.

Hamilton is an increasingly sought-after tourist destination with events and natural attractions drawing visitors to our City each year. Many visitors are looking for unique accommodations that traditional hotels do not offer, and short-term rentals fill this niche.

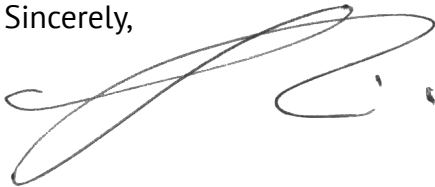
The City of Hamilton is cultivating a fresh, progressive image, and as such, restrictions to short-term rentals, and property rights in general, do not align with this goal.

Our neighbours in Toronto have implemented similar restrictions to short-term rentals as those proposed by the City of Hamilton. While some believed this would help relieve housing attainability and affordability issues in Toronto, the opposite happened – unfurnished rents have dramatically increased. The impact of such regulations in Toronto is evidence that heavy-handed restrictions do not impact the housing supply or decrease the cost of rental housing.

RAHB supports building and developing housing supply rather than infringing on private property rights. We encourage protecting economic vitality, diverse housing opportunities and protecting property owners. RAHB also believes in the principle of fair and equitable taxation. In this regard, City Council should consider how best to maintain a level playing field between the short-term rental economy and other rental options. We ask that the City ensure that any regulations adopted are clear, simple and not unduly restrictive.

Thank you for this opportunity to provide input. We want to offer our resources to participate in the process as a stakeholder.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lou Piriano', with a stylized, flowing script.

Lou Piriano  
2022 President  
REALTORS® Association of Hamilton-Burlington