



## **PLANNING AND HERITAGE COMMITTEE ADDENDUM**

Adoption of Addendum to the Agenda:

Motion by

**THAT the Addendum to the Planning and Heritage Committee Agenda dated October 21, 2021, be added to the agenda as printed to include the following:**

### **4.0 Report of the Manager of Planning:**

- 4.1 Final Draft Comprehensive Zoning By-law for the City of Stratford (PLA21-023)

Following publishing of the agenda, correspondence was received from Airbnb providing comments on the draft Comprehensive Zoning By-law for the City of Stratford and the regulations for short term rentals.

Attachment – Email from Airbnb dated October 15, 2021

Motion by

**THAT the correspondence from Airbnb dated October 15, 2021 in response to the draft Comprehensive Zoning By-law for the City of Stratford and its short term rental regulations be received for information.**

**From:** Ji Hee Shin Etienne <[REDACTED]>  
**Date:** October 15, 2021 at 12:12:42 PM EDT  
**To:** Dan Mathieson <[REDACTED]>  
**Subject:** Airbnb's Comments on Stratford's STR bylaw amendments

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Good morning Mayor Mathieson,

I hope this letter finds you well and in good health. We would also like to thank you for your leadership throughout the pandemic.

We are aware that Council will be looking to approve the comprehensive zoning bylaw that includes STR regulations on October 21st. While every municipality has unique needs when it comes to regulating STRs, we encourage you and your fellow council members to consider what the challenges your community faces regarding STRs and how to directly resolve those challenges. As such, we would like to take this opportunity to provide some insight and comments on the proposed amendments to your Short-Term Rental bylaw. We are confident that we will be able to work together in ensuring the regulations that are to be adopted will best suit the Host community of Stratford, and the community at large.

We have reviewed the staff recommendations and wanted to reach out to you about a number of concerns we have with the recommended approach.

- 1. Limiting days for rent** - By placing a limit on the number of days STR operators are able to rent out their accommodations for, creates significant hardships financially for many of our hosts who depend on the revenue generated from their STRs year-round as their primary source of income. Across the province, thousands of people are engaged in home sharing and the money Airbnb hosts earn is an important source of income and economic security for these families. For many, earning money through home sharing makes it possible for them to afford to stay in their homes. This is particularly important as, in 2019, 52% of our hosts in the province said that they host because it helps them make ends meet. Among them, 57% are women, one of the worst impacted demographics during the pandemic. In fact, Airbnb hosts report spending more than half the money they earn through the platform on expenses like mortgage payments and household bills. These hosts include retirees and empty nesters sharing the extra space in their home, and also young people and couples that rely on home sharing to help pay their mortgage, save for unexpected expenses or make necessary renovations. Unfortunately, many homeowners do not have the flexibility of putting their extra suites or rooms on the long-term rental market due to reasons such as needing the available accommodations for out-of-town family visiting for extended periods. Thus, renting on the STR market is their best option to utilize the unused space for most of the year. By prohibiting hosts from this flexibility, would be the equivalent of laying off/furloughing hundreds of Stratfords hardworking residents. With COVID-related job losses, it is imperative that people be able to leverage their most expensive and valuable asset as a tool of economic empowerment and growth.

2. **Parking and outdoor amenity space** - When it comes to parking requirements for STRs, we've seen the best and easiest regulations to be 1 parking spot per party of guests (as many carpool to their destinations), or 1 parking spot per 2 bedrooms. The .66 parking spaces per bedroom as it currently has been established in the comprehensive zoning bylaw may cause unnecessary confusion, and we would recommend using whole numbers to simplify things.

Additionally, the minimum outdoor amenity space appears to be a peculiar requirement as also exclaimed by Ms. Bridge, in that, this particular restriction does not actually address any concerns regarding the operation of STRs. For many guests, the accommodations are merely a place to sleep and rest in between their times exploring the city. In this sense, providing a required outdoor space for guests in home-sharing STRs, and not for other short-term accommodation providers, can appear as bias, in favor of one form of business over another.

3. **Apartments prohibited** - There appears to be no reasonable justification to prohibit STRs from operating out of apartment dwellings in your studies and reports. When it comes to apartments being shared on the STR market, strata corporations are able to create their own regulations and it is not necessary for the City to formally prohibit these operations. We have seen success in other cities when permitting apartment dwellings from being utilized as STRs, by requiring the operators to have the strata corporation provide written approval of STRs for their unit. This can be done by simply creating a consent form that would be part of the application process for licensing. We hope that this is something that you will consider amending to better support Stratford residents who are not able to own larger dwelling types such as those that have been permitted for STRs.

Following a productive conversation with Ms. Bridge earlier this week, I would like to take this opportunity to share some actions that Airbnb will take to promote compliance with the local bylaws. First, Airbnb will be building a responsible hosting page which will support Hosts with information about their obligations under the local bylaw. We will also be deploying a host education campaign to ensure that Hosts understand their responsibilities and to promote registration with the city.

Additionally, Airbnb also has several tools and resources available to the city to support tourism and economic development as well as to manage nuisances.

### **Airbnb's Commitment to Collecting Taxes and Supporting Public Services**

Airbnb believes that short-term rentals should support core public services. That's why, in addition to developing critical public safety tools, we are committed to working with provinces to efficiently and effectively collect and remit lodging taxes on behalf of our hosts and guests.

The MAT is an excellent tool for municipalities to raise much-needed revenue. However, the current system doesn't work for a global platform like Airbnb. With over 400 municipalities in

the province, platforms like ours are being asked to enter into hundreds of individual MAT collection agreements across the province. While we support collecting an accommodation tax and stand behind the communities and tourism development of the municipalities where we operate, the current system is cumbersome and isn't working well for municipalities or platforms. By making the tax mandatory and remitted to the province, the province would be able to ensure province-wide compliance and support municipalities by sharing these funds back to them with a similar system as is seen in British Columbia or Quebec.

We encourage the Mayor and Council to call on the province to support municipalities, small businesses and tourism development by making a minor change to the Municipal Accommodation Tax (MAT). That small change includes making the MAT mandatory, province-wide and centrally administered for all short-term rentals, on all platforms. This will help support municipalities and give travel and tourism a significant boost during the recovery phase.

To further this conversation, we recommend reaching out to your local MPP to move forward with a centrally collected and remitted Municipal Accommodation Tax (MAT), where the province will redistribute revenue earned directly to the appropriate municipalities.

## **Trust and Safety**

Our community's safety, both online and offline, is our priority. There have been more than half a billion guest arrivals in Airbnb listings to date, and negative incidents are extremely rare.

Even so, we're constantly working to improve our platform, our policies, and our protections, because even one incident is one too many. As a result, we have pioneered a series of tools that are already available to Airbnb users at no charge, covering all jurisdictions where we operate. You can find a detailed report of these initiatives by reading our latest [Trust Report](#).

Some of the most important tools available include:

- **[Neighborhood Support Line](#):** Providing direct access for guests, hosts, and the communities in which we operate is critical to trust on our platform. In January 2020, we launched a neighborhood support hotline in Canada so that neighbors can reach us directly with their concerns.
- **[Party House Ban](#):** In November 2019, our CEO took a stand against "party houses" and formally banned them from our platform in accordance with our policies. We went on to expand on that ban with more [transparency about the policy](#), including a ban on "open-invite" parties.
- **[Risk Detection Tools](#):** We have implemented high-risk detection systems that flag potentially problematic reservations for manual review. Thanks to these systems, we have identified and proactively cancelled nearly 9,000 high-risk reservations in the United States and Canada.
- **[Restricting bookings by guests under the age of 25](#):** Guests under 25, without a history of positive reviews are now restricted from booking entire home listings near their primary residence. This policy has blocked over 770,000 distinct reservation attempts in the US and Canada.

A wonderful tool that we are happy to share with you as well, is our [Airbnb City Portal](#). This tool provides insights into local Airbnb activity, travel trends, host compliance to local city policies and bylaws, as well as, one-to-one support from Airbnb.

We believe it is possible to set in place fair guidelines which target bad actors without stifling the economic opportunities and flexibility home sharing provides families. Through balanced regulations, we can play a part in providing meaningful connections and experiences between our guests, hosts, and neighbors.

Please do not hesitate to reach out with questions or concerns.

Sincerely,



**Ji Hee Shin Etienne**

Public Policy Associate || Associée aux politiques publiques

[#WeAccept](#) || Pronouns: She, Her