

Hello city council,

I am writing to address the proposed Shared Accommodation By-law. I meet the reasoning for the updating of the by-law, that being the need to address housing needs and human rights, with great approval. Indeed, to be critical, some of these updates are overdue. In addressing this by-law, however, I urge council to approve it as a work in progress which allows for any updates necessary in the short-term.

In brief, the removal of a minimum separation distance, the allowance for multi-tenant homes in all residential zones, improved safety standards, quality assurance, accountability and compliance measures, and fees set at reasonable rates are all worthy changes to be supported.

However, I also think it necessary to raise some concerns about the Shared Accommodation By-law as proposed. Namely, that the rights of tenants seem to be a secondary concern. There is a substantial interest in the city's relationship with licensed landlords, but if the licensee is persistently in violation of the city's directives, it is unclear what safety measures will be applied for tenants. It is likewise unclear what the city's safety plan is for the protection of many current rental arrangements through the proposed licensing process. It is a more or less open secret that several student accommodations would not meet the guidelines as outlined. What is the plan to maintain the shelter and security of persons currently living in such arrangements? What protections exist for tenants in a situation where the licensee has their licence revoked, for acts which are contrary to the agreement with the city? Additionally there are stipulations with unclear reasoning, such as limiting only one renter per lease despite allowing two adults to share a single room.

There are also significant considerations with regard to the floor space regulations. Such regulations do not, to my knowledge, exist in the same way for single family homes, and should be considered in light of building codes and health and safety only. To place restrictions based on chosen living arrangements speaks more to human rights than building codes or health and safety practices.

There is also wording that places tenants in potentially uncomfortable situations. For example, the wording regarding shared amenities would suggest that an en suite bathroom may not be used privately by a single tenant even when a shared bathroom exists elsewhere in the house. This may impose unnecessary restrictions if followed to the letter.

I also have concerns about the grouping of lodging homes together with short-term accommodation rentals (AirBnB, VRBO, etc.). Indeed, these housing types are quite different in role and function, and due to the nature of an already financialized housing system, will be in competition with each other when it comes to the provision of housing. To be sure, short-term rentals may be valuable for temporary labourers, tourists, and potential residents visiting to get a sense of the local environment. However, they are not viable long-term housing options, which is the subject of the present housing crisis. Lodging homes or multi-tenant homes are perhaps the most affordable long-term housing option at this time, and to promote both multi-tenant and short-term accommodations simultaneously in a heavily financialized housing market which has a scarcity resulting in profiteering is a policy likely to lead to failure to produce substantial long-term housing accommodations.

I urge council to consider this by-law as a work in progress and update these terms to provide more substantial support, subsidization, or incentives for the creation of shared accommodations that encourage long-term housing options rather than the short term profiteering corporate model which has led to ongoing issues elsewhere in Canada.

This by-law update is worth approving, however, it must be an ongoing conversation to affirm the wellbeing of tenants. While the brief refers to the language of “the housing crisis”, “housing needs”, and “human rights”, this is a document significantly lacking in tenant-focused language. If the goal is to provide housing, the language should reflect that goal. This document seems to be more closely aligned with a set of rules outlining prohibitions to this goal.

Kevin White
Kitchener