



Delegation Request Form

I wish to appear before *

☒ Council

☐ Advisory Committee of Council

Date of Meeting *

4/17/2023



Name of Delegate(s) *

Stanley Razenberg

Address *

Phone *

Email *

Capacity in which you will be attending *

☒ Attending as an Individual

☐ Representing a Group / Organization

Have you contacted Administration regarding this matter? *

☐ Yes

☒ No

Reason(s) for Delegation Request (subject matter to be discussed). If the request is in response to an item on the agenda, please specify the item's agenda # *

Proposed Short Term Rental Bylaw

If your request is in response to an agenda item, are you in favour of the recommendation? If not, please provide your reasoning below


Will a powerpoint presentation be made? *

☐ Yes

☒ No

Note: An electronic copy of the PowerPoint presentation is required to be submitted to delegations@amherstburg.ca no later than 12:00 noon on the Friday before the meeting.

Please upload speaking notes and/or presentation materials - 4 Attachments Max (10MB Each) (pdf, docx, xlsx, jpg, jpeg, gif, png, tif) *

File Name	
	Submissions to Town Council.pdf 95.0 KB

Personal information contained on this form is authorized under Section 5 of the Town of Amherstburg's Procedure By-law, for the purpose of contacting individuals and/or organizations requesting an opportunity to appear as a delegation before Council or an Advisory Committee of Council. The Delegation Request Form may be published in its entirety with the public agenda which is also posted on the Town's website. The Procedure By-law is a requirement of Section 238(2) of the Municipal Act, 2001.

Please note that all meetings are open to the public except where permitted to be closed to the public under legislated authority. Questions regarding collection of the information on this form or additional accessibility requirements may be directed to the Municipal Clerk, 271 Sandwich Street South, Amherstburg, ON N9V 2A5, 519.736.0012.



Delegate Guidelines

In accordance with the Town's Procedure By-law, a by-law governing the proceedings of Council, the conduct of its members and the calling of meeting for the Town of Amherstburg:

- Delegations may address Council or Committee for the purpose of bringing a specific matter before Council. In this instance, the request form must be received prior to the preparation of the agenda, no later than 12: 00 noon on the Wednesday prior to the Monday meeting.
- Delegations may address Council or Committee with respect to an item on the agenda, to which the individual/group has a bona fide interest and verbally present information on matters of fact. In this instance, the request form must be received by 12:00 noon on the Friday preceding the Council meeting.
- There is a strict time limit for delegations at meetings. Delegations will have 5 minutes to speak, not inclusive of questions from Council or the Committee. No more than 4 delegations will be heard per item of discussion by Council.
- Delegation requests received after the deadline will not be added to the public agenda. In the event registration with the Clerk is not made by 12:00 noon on the Friday preceding the meeting, but prior to 4:00 pm on the date of the meeting, the Clerk will bring the request to the attention of Council. Council, on a majority vote, may decide to hear the delegation.
- PowerPoint presentations are permitted provided that an electronic copy of the presentation is submitted to the Town Clerk no later than 12:00 noon on the Friday before the meeting. A copy of the presentation will be distributed to Council or Committee, as the case may be, as part of the delegation submission.
- A copy of the delegations speaking notes/presentation material must be submitted with the delegation request form to comply with Section 5.11 of the Procedure By-law.

Thank You

Submission Successful

Request for Delegation & Overview

1. This request is made in respect of the upcoming Council meeting at which proposed bylaws concerning regulation of short-term rentals will be submitted for Council's review.
2. The regulatory framework being proposed suggests that Council select between whether or not to require short term rental operators to be principally resident within the dwelling offered as a short-term rental unit¹.
3. It is respectfully submitted that short term rentals can be effectively regulated without the requirement for owner-occupied restrictions.

Competing Interests of the Community

4. On the one hand, it is understandable that Council needs to implement rules and regulations so that all residents can enjoy their homes without unreasonable interruption.
5. On the other hand, it is respectfully submitted that a fabric of this community is the tourism it attracts. Many of the local small businesses rely upon this tourism, and it is important to safeguard these economic interests.
6. Short term rentals serve to promote and enhance the tourism economy within Amherstburg on several fronts:
 - a. First, short term rentals serve to bring tourists into the community. People looking to take a summer holiday will often decide which Township or City to visit based on a particular short-term rental property they find online. An attractive property with amenities such as a lake, river, hot tub, swimming pool, etc., will encourage travelers to book that property over another, and will correspondingly draw tourists into town;

¹ April 12th, 2023 Report, Appendix B, page 47;

- b. Second, when tourists arrive they engage with and support local businesses. Tourists will dine at the local restaurant, buy groceries at the local store, purchase fuel at the local gas station, etc.
 - c. Third, operation of a short-term rental property itself provides support for the local economy. In operating a short term rental one needs a cleaner, summer/winter maintenance contractor, plumber, electrician, pool/hot tub maintenance person, handyperson, etc. These are jobs that go to the local community;
 - d. Finally, the regulation of short-term rentals provides the Town with an opportunity to generate revenue from the licensing and regulation of these activities.
7. The practical effect of imposing an owner-occupied restriction is such that it will reduce the number of short-term rentals available, which will in turn have an adverse impact on tourism and the local economy.
8. The due diligence conducted by the Town's Administration suggests that Amherstburg is not overcrowded with short term rentals given the population of the town and the degree of tourism within the community.
9. To this end, Administration's review of data from AirDNA reveals that there are only 64 active short-term rentals within Amherstburg². The Town is estimated to have a population of approximately 23,500 people³. This suggests that less than 1 % of the households within the town are providing short term rentals.
10. Given that there are no hotels or motels within the Town, it is respectfully submitted that all 64 of the short term rental units are needed in order to support the local tourism community and meet its lodging needs.

² April 12th, 2023 Report, page 4 of 6.

³ 2021 Census Report;

11. It is respectfully submitted that Council's approach to the regulation of short term rentals should focus not on reducing the number of available units, but rather on regulating the units in place to support a healthy balance between the interests of the town's residents and that of the town's tourism and local economy.

Effective Regulation of Short-Term Rentals can be achieved without an Owner-Occupied Restriction

12. The Town's Administration has done an excellent job in proposing methods to ensure the effective regulation of short-term rentals, all of which can be achieved without implementing an owner-occupied restriction.

13. The regulatory checks and balances include:

- a. Vulnerable Sector Screening of the short-term rental operators;
- b. Ensuring proper liability insurance;
- c. Restricting use of outdoor amenities such as hot tubs to reasonable hours; and
- d. Establishing a Licensing Panel to address contraventions of the proposed Bylaw.

14. Implementing these recommendations, without owner-occupied restrictions, would keep available the limited pool of short term rentals within the community while simultaneously ensuring those units are run in a manner that is respectful to the rest of the community.

Conclusion

15. For the above reasons, it is respectfully requested that Town Council adopt the non-owner occupied Bylaw put forth as Appendix "C".

All of which is respectfully submitted.

Dated: April 13th, 2023

Stanley Razenberg