

March 23, 1999

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Department of Urban Planning and Public
Works

Ward/Quartier
City Wide

- Planning and Economic Development
Committee / Comité de l'urbanisme et de
l'expansion économique
- City Council / Conseil municipal

Action/Exécution

Official Plan Amendment - Rental Housing Conversion Policy

Modification du Plan directeur - Politique de conversion des logements locatifs

Recommendations

1. That an Official Plan Amendment to the City of Ottawa Official Plan, to modify Objective Number 3.3.1 b) and replace Policy Number 3.3.2 b) of Chapter 3.0, Volume I (residential rental conversions), be APPROVED and ADOPTED as detailed in Document 1.
2. That the City of Ottawa By-law Numbers 58-86, 99-94 and 285-96 be repealed.
3. That the by-law attached as Document 2 delegating authority for granting of consents to Committee of Adjustment be enacted.



March 25, 1999 (1:41p)

Edward Robinson
Commissioner of Urban Planning and Public
Works

SW:sw

Contact: Stanley Wilder - 244-5300 ext. 1-3116



March 26, 1999 (8:50a)

Approved by
John S. Burke
Chief Administrative Officer

Financial Comment

During the 1998 Corporate Reorganization revenue and expenditure budgets (including staff) relating to RHPA applications were eliminated. Approval of this report will not affect the 1999 Operating Budget. Consent approvals delegated to the Committee of Adjustment will not generate any additional revenues.



March 25, 1999 (1:19p)

for Mona Monkman
City Treasurer

BH:cds

Executive Report

Reasons Behind Recommendations

Recommendation 1

On June 17, 1998, Bill 96, the new Tenant Protection Act (TPA) was proclaimed by the Provincial Government. Its passage repealed Bill 211, the Rental Housing Protection Act (RHPA), which had been in place since 1989. The key difference between the RHPA and the TPA is that the latter piece of legislation removes the explicit authority that was contained in the RHPA which required municipalities to protect rental units. As a result, the City will have to rely on existing Official Plan policies and other legislation (i.e., the Planning Act and the Condominium Act) to regulate conversions. With implementation of the TPA, the authority for approval of applications for conversion to condominium ownership will revert to the Region under the Condominium Act and the authority for approval of applications for consent to sever to freehold ownership will revert to the Committee of Adjustment. In view of the legislative and procedural changes and to ensure a consistent approach when evaluating rental conversion proposals, a review of the present conversion policy was undertaken. The City's policy must also conform to the Region's policy in their Official Plan.

The recommendation will result in a revised conversion policy being added to the City's Official Plan which incorporates specific evaluation criteria. The evaluation criteria provide the basis for the approval or rejection of conversion applications. They are intended to ensure that the supply of rental housing is not unduly affected by the conversion activity.

Recommendation 2

By-law 58-86

By-law 58-86 was passed by City Council in March, 1986, prior to the enactment of the Rental Housing Protection Act in June, 1986. As a result of decisions by the Committee of Adjustment to grant consents to sever several large rental row house projects in the Overbrook and

Carlington neighbourhoods, City Council approved a report which provided first right of refusal to purchase a unit and security of tenure to existing tenants. These conditions were to apply to consent applications involving properties with 10 or more rental units. The yardstick of 10 or more units was established to address the issue of balance in the market place and to provide an adequate choice in housing type between renting and owning a home. By-law 58-86, which implemented the policy, stipulates that:

- a tenant residing in a unit for which severance is being applied shall be given a period of not less than 60 days after consent has been granted to exercise the first right of refusal to purchase the unit; and
- should the tenant decline to purchase the unit, the tenant shall have the opportunity to continue to rent the unit for a period of *1 year* beyond the date on which consent to sever is granted.

This by-law was superceded by the Rental Housing Protection Act which provided City Council the authority to impose conditions of approval for severance applications involving rental property of 5 or more units. Over the past three years as the rental vacancy rate rose above 3%, City Council considered and approved 11 applications for conversion to freehold ownership, subject to various conditions being met. One of the conditions provided tenants with 150 days to exercise the right of first refusal to buy their unit while another provided them with *10 years* security of tenure if they chose not to purchase.

The new Tenant Protection Act provides existing tenants, in a property which has become separately conveyable due to a consent under Section 53 of the Planning Act, with “*indefinite tenure*” (lifetime security) as their tenancy cannot be terminated if they choose not to purchase the unit. This provision of the new Act affords tenants better protection than in By-law 58-86.

The new Act does not provide existing tenants the first right of refusal to purchase a unit in the case of severance applications. However, because tenants have been provided lifetime security of tenure, it is advantageous for a landlord to offer and to sell the units to existing tenants.

In consideration of the foregoing, it is recommended that By-law 58-86 be repealed.

By-law 99-94

By-law 99-94 was enacted to confirm that the authority for granting consents under Section 53 of the Planning Act remained with City Council when such applications were made in conjunction with applications under the Rental Housing Protection Act. With the repeal of the RHPA, this by-law is redundant.

By-law 285-96

By-law 285-96 was enacted to confirm the fees that were charged under the Rental Housing Protection Act and the Condominium Act. With the repeal of the RHPA, this by-law is redundant.

Recommendation 3

The repeal of the Rental Housing Protection Act has rendered certain provisions of By-law 171-83, entitled “A by-law of The Corporation of the City of Ottawa respecting the Committee of Adjustment”, redundant. It is necessary that City Council delegate authority to the Committee of Adjustment in order that it maintain the general consent jurisdiction it had under the said by-law. The proposed by-law, to be referred to as the “Committee of Adjustment By-law”, delegates authority for granting of consents under Section 53 of the Planning Act to the Committee of Adjustment and is contained in Document 2 of this report.

Economic Impact Statement

The recommended policy changes will not result in any measurable economic impact.

Consultation

A letter and explanation of the proposed Official Plan amendment was circulated to the 14 individuals from the public and private sector representing the interests of landlords and tenants who have participated in the rental conversion policy consultation (Document 3). Seven responses were received either in writing or by phone. Three respondents had no comments. Three other respondents provided comments on the proposed vacancy rate criteria.

The RMOC also commented on the requirement for conformity of policies in the City’s and the Region’s Official Plans noting that municipal policies can be more restrictive but not more permissive than the Region’s. (See Document 4 for consultation details).

Disposition

Department of Corporate Services, Statutory Services Branch, to notify Clerk of the Regional Municipality of Ottawa-Carleton of City Council’s decision set out in Recommendation 1.

Office of the City Solicitor to forward required by-laws to City Council.

Department of Urban Planning and Public Works to:

1. prepare and circulate notice of the Official Plan adoption to those persons and public bodies who requested notification; and
2. submit the Official Plan amendment and the required documentation to the Regional Municipality of Ottawa-Carleton for approval.

List of Supporting Documentation

- Document 1 - Official Plan Amendment - Amendment du plan directeur
- Document 2 - Proposed By-law respecting the Committee of Adjustment
- Document 3 - Members of the Rental Conversion Policy Consultation Group
- Document 4 - Consultation Details

Part II - Supporting Documentation

Document 1

Official Plan Amendment P Modification du Plan directeur

Land use

Utilisation du sol



City of
Ville d' **Ottawa**

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THE STATEMENT OF COMPONENTS

PART A - THE PREAMBLE introduces the actual Amendment but does not constitute part of Amendment No. ____ to the City of Ottawa Official Plan.

PART B - THE AMENDMENT consisting of the following text constitutes Amendment No. ____ to the City of Ottawa Official Plan.

PART A - THE PREAMBLE

1.0 Purpose

The purpose of this amendment is to revise the City of Ottawa's rental conversion policy.

The amendment will change the wording of Objective Number 3.3.1 b) and replace Policy Number 3.3.2 b) which is found in Section 3.3 "Tenure Mix" of Chapter 3.0 - Housing Development and Residential Areas of Volume 1: Primary Plan of the City of Ottawa Official Plan.

2.0 Applicability

The amendment will result in a change to the types of planning matters that are subject to this policy. The revised policy also will apply to applications for consent to sever and part lot control exemption under the Planning Act.

3.0 Basis

3.1 Existing Objective and Policy

The existing wording for Objective Number 3.3.1 b) is as follows:

"To protect the existing stock of rental housing from conversion when rental vacancy rates are considered low, subject to the provisions of the Rental Housing Protection Act".

The existing wording for Policy Number 3.3.2 b) is as follows:

"City Council shall not permit the conversion of rental housing to condominiums, equity co-operatives or other forms of tenure unless:

- i. the vacancy rate for rental structures in the city exceeds an acceptable percentage level which shall be the more restrictive of the percentage level in the Municipal Housing Statement or the percentage level established in the Official Plan of the Regional Municipality of Ottawa-Carleton as amended from time to time; and
- ii. the proposal meets other criteria as set out in the Municipal Housing Statement which are consistent with the objectives of this section of the Plan; or
- iii. the building proposed for conversion is designated as a property under the provisions of the Ontario Heritage Act".

The Policies in the Council approved Municipal Housing Statement that stem from Policy Number 3.3.2 b) are as follows:

- ▶ That no conversion of rental accommodation to condominium, equity co-op or other form of tenure be approved until such time as:
 - i) the vacancy rate for privately initiated structures, as reported by Canada Mortgage and Housing Corporation (CMHC), exceeds 3% within the City of Ottawa overall for two successive bi-annual surveys, and
 - ii) for conversions within the inner-city zones, referred to in the CMHC vacancy survey as the Centre (Zone 1), Northeast (Zone 2) and Southwest (Zone 3), the vacancy rate for the City of Ottawa in privately initiated structures exceeds 3% and the rate for the inner-city zones exceeds 5% for two successive bi-annual surveys.
- ▶ That an application for conversion to condominium not be approved if it would result in the loss of 20% or more of the existing rental stock of the same dwelling type within a 2-kilometer radius of the property.

3.2 Need for Change

As a result of the proclamation on June 17, 1998 of the new provincial Tenant Protection Act and the repeal of the Rental Housing Protection Act, it became necessary to review the rental conversion policy. The City's policy must also conform to the Region's conversion policy as outlined in Section 3.3.2(9) of the *new* Regional Official Plan.

The key difference between the Rental Housing Protection Act, in existence since 1986, and the new Tenant Protection Act is that the latter piece of legislation removes the explicit authority that was contained in the Rental Housing Protection Act which required municipalities to protect rental units. Conversion applications now will be processed pursuant to other legislation and policies (*i.e., the Condominium Act, Planning Act and municipal and regional conversion policies*). With implementation of the Tenant Protection Act:

- ▶ the authority for approval of applications for conversion to condominium reverts to the Region (RMOC); and
- ▶ the authority for approval of all applications for conversion to freehold ownership reverts to the Committee of Adjustment.

The existing Official Plan conversion policy refers to vacancy rates and evaluation criteria set out in the City's Municipal Housing Statement, a document no longer required by the Provincial Government. In view of the legislative and procedural changes and to ensure a consistent approach when evaluating rental conversion proposals, a review of the present conversion policy was undertaken.

3.3 Proposed Policy

An amendment to the City's Official Plan, in the form of changes to the wording of Objective 3.3.1b) and a replacement conversion policy 3.3.2 b) is proposed. The change to the objective will reflect the repeal of the Rental Housing Protection Act. The replacement policy removes the reference to the Municipal Housing Statement and incorporates a specific vacancy rate to serve as a benchmark when reviewing conversion proposals of three or more units. It also includes evaluation criteria related to market rent levels and the supply of rental housing.

3.4 Reasons for Proposed Changes

The revised Official Plan policy will provide the municipality with objective and defensible criteria to determine the impact of the removal of rental units from the city's housing stock. To accomplish this, the following changes are proposed:

- ▶ The current reference to the Municipal Housing Statement (Policy 7.6.5), which elaborates on evaluation criteria in the Official Plan will be removed. Municipal Housing Statements are no longer required by the Provincial government. Evaluation criteria (*i.e.*; *vacancy rates*, *market zones*) will be included in the amended Official Plan policy.
- ▶ Properties with two residential dwelling units will not be subject to the City's evaluation criteria. During the period the Rental Housing Protection Act was in place, from 1986 to 1998, properties with four or fewer residential units were exempt from the provisions of the Act except in the case of conversions to condominium ownership. Over the 12 year period, the Committee of Adjustment remained responsible for granting consent to sever property with *four* or fewer units under the Planning Act. In some instances, the conditions outlined in By-law 58-86 relating to the first right of refusal to purchase a unit and to security of tenure were imposed. With the repeal of the Rental Housing Protection Act, it would be appropriate to consider exempting properties of *two* or fewer residential units, *i.e. semi-detached houses*, from the proposed conversion policy. It may happen that both halves of a semi-detached house are occupied by the owner and members of the owner's immediate family and consent to sever is sought merely to create separate family ownerships. In cases where one unit or both units of a semi-detached house happen to be rented and consent to sever is granted by the Committee of Adjustment, the tenant(s) will be afforded lifetime security of tenure through the provisions of the new Tenant Protection Act.
- ▶ A rental vacancy rate of 3% will be specified in the policy as an evaluation criterion. This vacancy rate is indicative of a balanced and competitive rental housing market according to the Canada Mortgage and Housing Corporation (CMHC). If it falls below this benchmark, a loss of rental stock may result in a supply insufficient to meet demand, further exacerbating a tight market for those dependent upon rental tenure. Many municipalities in Ontario who have historically had low vacancy rates use 3% as the target vacancy rate below which conversions would not be considered. This figure is also used by the Regional

Municipality of Ottawa-Carleton in its Official Plan. The 3% rate will apply consistently across the city to all local housing market zones.

The vacancy rate benchmark of 5% for the inner city area (CMHC Rental Market Survey Zones 1, 2, and 3) which is set out in the Municipal Housing Statement is not included in the proposed Official Plan policy. Since the CMHC rental vacancy rate rose above 3% in the fall of 1995, the majority of the conversion applications processed under the Rental Housing Protection Act have been for consent to sever ground oriented row house stock to freehold ownership. The inner-city rental stock is largely comprised of apartment complexes which can only be converted to condominium ownership. The resale market for condominium apartments in Ottawa has been very soft for the past decade and the prospect of a change to this trend is unlikely in the foreseeable future according to CMHC forecasts. As there has been no pressure to convert apartment buildings to condominium, a more restrictive vacancy rate benchmark for the inner-city area is deemed unnecessary.

- The level of market rents will also be included as a new evaluation criterion in conformity with the Region's policy. The analysis of the average market rents by unit type and bedroom type will help to establish the level of affordability of the units proposed to be converted. The loss of units with rental prices at or below average market rents may jeopardize the ability of low and moderate income families to access adequate affordable housing. The annual CMHC Rental Market Survey is a reliable source of information on rent levels and provides a consistent measure on which to base comparisons.
- The criterion in the Municipal Housing Statement whereby a proposed conversion should not result in the loss of 20% or more of existing rental stock of the same dwelling type within a 2 kilometer radius of the subject property will be changed to replace the 2 kilometer radius distance. The calculation of the 2 kilometer radius has often extended beyond the city limits making it difficult to precisely determine the number of rental units by housing type in the area. The criterion in the proposed Official Plan conversion policy refers to Official Plan neighborhoods. Map Number 3 of the Official Plan has the city divided into 45 neighborhoods for monitoring purposes. Profiles are available for each of the neighborhoods which include census data of the housing stock by housing type and tenure. This change also reflects the need for a reliable and consistent source of information on the rental stock in the city. The census data will be supplemented with information from conversion applications which have recently been approved and from building permits. This will ensure the statistics used in analyzing conversion proposals are current. The inclusion of this criterion in the proposed Official Plan policy is meant to ensure an adequate supply and distribution of affordable rental housing in all neighborhoods consistent with demand.

PART B - THE AMENDMENT

1.0 The Introductory Statement

All of this part of the document entitled “Part B - The Amendment”, consisting of all the following text constitutes the Amendment to the City of Ottawa Official Plan.

2.0 Details of the Amendment

Objective Number 3.3.1 b) of the City of Ottawa Official Plan, Volume 1, is deleted in its entirety and replaced with the following:

- b) “To protect the existing stock of rental housing from conversion when rental vacancy rates are considered low”.

Policy 3.3.2 b) of the City of Ottawa Official Plan, Volume 1, is deleted in its entirety and replaced with the following:

- b) “ City Council shall not support the conversion of rental housing to condominium ownership and to freehold ownership as a result of applications such as, but not limited to, applications for severance or part lot control exemption, for properties with three or more rental units unless *all* of the following criteria are satisfied:
 - i) the rental vacancy rate by dwelling/structure type for the Ottawa CMA exceeds 3% as defined and reported yearly through the Canada Mortgage and Housing Corporation (CMHC) Rental Housing Market Survey;
 - ii) the existing market rents of the units proposed for conversion are above the average market rent levels for the Ottawa CMA as reported yearly by the CMHC Survey for rental units of a similar dwelling/structure and bedroom type;
 - iii) the proposed conversion will not result in the loss of 20% or more of the existing rental stock of the same dwelling type in the Official Plan neighborhood monitoring area in which the property is located and in the adjacent Official Plan neighborhood monitoring areas as identified in Map Number 3.

A building designated under Part IV or V of the Ontario Heritage Act is exempted from this policy”.

3.0 Implementation and Interpretation

Implementation and interpretation of this Amendment shall be made having regard as well to the applicable policies set out in Volume 1 - Primary Plan of the City of Ottawa Official Plan and other applicable City Council approved policies including the City’s Public Participation Policy.

BY-LAW NUMBER

A by-law of The Corporation of the City of Ottawa respecting the Committee of Adjustment.

WHEREAS The Regional Municipality of Ottawa-Carleton has delegated the authority for the giving of consents under Section 54(1) of the Planning Act, R.S.O. 1990, Chap. P.13, formerly Section 53 of The Planning Act, 1983, S.O. 1983, Chap. 1, by By-law No. 106 of 1983 entitled “A by-law pursuant to Section 53 of The Planning Act 1983 delegating authority to the Council of various area municipalities”;

AND WHEREAS the Tenant Protection Act, 1997, S.O. 1997, Chap. 24 repealed the Rental Housing Protection Act rendering certain provisions of By-law Number 171-83 entitled “A by-law of The Corporation of the City of Ottawa respecting the Committee of Adjustment”, as amended, redundant;

THEREFORE the Council of The Corporation of the City of Ottawa enacts as follows:

1. The Committee of Adjustment of the City of Ottawa is hereby confirmed, constituted and continued and it shall be composed of five members..
2. The members of the Committee of Adjustment shall be appointed by the Council of The Corporation of the City of Ottawa from the public.
3. The Council of The Corporation of the City of Ottawa pursuant to Section 54(2) of the Planning Act, R.S.O. 1990, Chap. P.13 hereby delegates the authority for the giving of consents under Section 53 of the said Act in respect of land situated in the City of Ottawa to the Committee of Adjustment.
4. The Committee of Adjustment shall be subject to the conditions of the delegation of authority from the Council of The Regional Municipality of Ottawa-Carleton to the Council of The Corporation of the City of Ottawa recited in By-law No. 106 of 1983 entitled “A by-law pursuant to Section 53 of The Planning Act 1983 delegating authority to the Council of various area municipalities” and the Committee of Adjustment shall be responsible for complying with the requirements of the said By-law No. 106 of 1983.
5. The Committee of Adjustment shall deliver a copy of each notice of decision rendered pursuant to Section 53 of the said Act, in accordance with the provisions thereof, to the Commissioner of Urban Planning and Public Works and the City Solicitor for The Corporation of the City of Ottawa
6. By-law Number 171-83 entitled “A by-law of The Corporation of the City of Ottawa respecting the Committee of Adjustment”, as amended is repealed.

7. This by-law may be referred to as the "Committee of Adjustment By-law".

GIVEN under the corporate seal of the City of Ottawa this day of ,
1998.

CITY CLERK

MAYOR

Members of the Rental Conversion Policy Consultation Group

Marni Cappe	Planning and Development Approvals Department Regional Municipality of Ottawa-Carleton
Novak Jankovic	Ottawa Branch Office - CMHC
Margaret Singleton	City Living
Trudy Sutton	Housing Help
Rosine Kaley	Action Logement
Dan McIntyre	Landlord / Tenant Consultant
Catherine Boucher	Centretown Citizens Ottawa Corporation
Ted Fobert	FOTENN Planning Consultants and Chair, Committee of Adjustment, City of Ottawa
Alan Cohen	Soloway Wright, Barristers and Solicitors
Pierre Dufresne	Chairperson, Builder/Developer Council, OCHBA
David Kardish	Regional Group of Companies
Luigi Caparelli	Ottawa Regional Landlords Association - ORLA
Sandy Smallwood	Andrex Holdings
Peter Burns	Urbandale Corporation

Consultation Details

Four of the respondents felt that the vacancy rate evaluation criteria outlined in the Municipal Housing Statement (3% city wide and 5% within the inner city survey zones) should remain unchanged. The reasons provided are: i) the inner-city neighbourhoods have the highest concentration of affordable rental housing in the RMOC which warrants a more restrictive vacancy rate than the one used for the remainder of the city and region and ii) the pressure for rental conversions will remain greater in the downtown area and therefore the 5% vacancy rate should be retained.

Response

Since the CMHC rental vacancy rate rose above 3% in the fall of 1995, the majority of the conversion applications processed under the Rental Housing Protection Act have been for consent to sever ground oriented row house stock to freehold ownership. The inner-city rental stock is largely comprised of apartment complexes which can only be converted to condominium ownership. The resale market for condominium apartments in Ottawa has been very soft for the past decade and the prospect of a change to this trend is unlikely in the foreseeable future according to CMHC forecasts. As there has been no pressure to convert apartments to condominium (two applications for the conversion of apartment buildings in the inner-city were received during the time the Rental Housing Protection Act was in force and both applications were eventually withdrawn), a more restrictive vacancy rate benchmark for the inner-city area is deemed unnecessary. Furthermore, a survey of rental conversion policies in major urban municipalities across the country completed last year by a City of Toronto consultant revealed that Ottawa was the only city with a more restrictive vacancy rate criterion for the inner-city area.

Staff recommend that the 3% vacancy rate criterion be applied city-wide as described in the proposed policy.

Planning and Development Approvals Department Regional Municipality of Ottawa-Carleton

1. The City's policy on conversion can establish more *restrictive* criteria than the Regional policy criteria. But in order to conform to Regional policy, the City's policy cannot be more *permissive*. To conform, the City's policy must ensure that conversion will be permitted when, at a minimum, the following two criteria are met: 1) the vacancy rate for the Ottawa CMA exceeds 3% and 2) the rental prices of the units to be converted are above the rental prices for the Ottawa CMA for each unit and bedroom type. Therefore, the City's policy should refer to these two criteria.

Response

The draft of the policy which was circulated referred to the vacancy rate and rent levels in the *City of Ottawa*. Upon review however, the City's vacancy rate and average rents by unit and bedroom type over the past 10 years were found to be reasonably similar to those in the *Ottawa CMA*. The policy has been changed to reflect this situation.

2. Another issue of conformity is exempting applications with four or fewer units. The Regional policy applies to *all* conversion applications regardless of the number of units involved. The words “with five or more rental units” should be *deleted*.

Response

The draft of the policy which was circulated referred to exempting applications with four or fewer rental units. The provisions of the former Rental Housing Protection Act only applied to properties of 5 or more rental units except for conversion to condominium. Applications for consent to sever properties of up to four units, regardless of the tenure, were considered by the Committee of Adjustment rather than by City Council. These included semi-detached houses and three and four unit town house properties. In some instances, the conditions outlined in By-law 58-86 relating to the first right of refusal to purchase a unit and to security of tenure were imposed. The policy being proposed extends to conversions to freehold ownership as a result of applications, such as, but not limited to, applications for severance or part lot control exemption. The exemption for small properties of up to four units which existed in the former RHPA was included in the draft policy. It was felt that the impact of small scale conversions on the rental market would be minimal.

As a result of the comment from the Region, the proposed policy has been changed to exempt properties of *two* or fewer residential units (*i.e. semi-detached houses*). It may happen that both halves of a semi-detached house are occupied by the owner and members of the owner’s immediate family and consent to sever is sought merely to create separate family ownerships. In cases where one unit or both units of a semi-detached house happen to be rented and consent to sever is granted by the Committee of Adjustment, the tenant(s) will be afforded lifetime security of tenure through the provisions of the new Tenant Protection Act.

Councillor Elisabeth Arnold

It appears that the City of Ottawa will have no tools at its disposal to regulate the conversion of rental uses, as conversions to condominium units will be under the control of the RMOC, and severances of rental row dwellings will return to the Committee of Adjustment. As well, the authority of the Municipal Housing Statement will be removed.

A city-wide 3% vacancy rate will provide an objective benchmark for reviewing applications to convert rental units. However, the elimination of a 5% vacancy rate threshold for the inner city neighbourhoods does not recognize the special significance of rental accommodation in these areas, where the adequacy of supply of rental housing is especially important. The 5% rate in inner city neighbourhoods should be retained.

With few (or none) legal mechanisms available to the City of Ottawa, the statement ‘shall not support the conversion of rental housing’ is somewhat empty. What steps are still available to the City to protect the existing stock of rental housing? The OPA might make an explicit reference to these measures (if any).