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Item No. 15.1.2
Halifax Regional Council
May 27, 2025

TO: Mayor Fillmore and Members of Halifax Regional Council

FROM: Cathie O'Toole, Chief Administrative Officer

DATE: April 3, 2025

SUBJECT: **Update on Regulation of Short-term Rentals**

RECOMMENDATION REPORT

ORIGIN

January 24, 2023, Halifax Regional Council motion (Item No.15.1.11):

MOVED by Councillor Cleary, seconded by Councillor Hendsbee

THAT Halifax Regional Council: ...

2. Direct the Chief Administrative Officer (CAO) to prepare a staff report that explores approaches to tourist accommodations in rural parts of the Municipality that are outside of the urban service area boundary; and

3. Direct the CAO to provide a supplementary report so that Council may consider short term rentals in secondary units and second units on the same lot as a resident's primary dwelling, and identify proactive enforcement to short-term rentals, including staff requirements and funding options required to carry out the approach.

MOTION AS AMENDED PUT AND PASSED UNANIMOUSLY.

EXECUTIVE SUMMARY

On January 24, 2023, Regional Council gave first reading to proposed amendments to municipal planning documents to establish region-wide policies and regulations for short-term rentals (STRs). At first reading, Regional Council further requested supplementary reports through additional motions to consider:

- Approaches to STRs in the context of tourist accommodation in rural areas;
- Whether STRs should be permitted in secondary units and second units located on the same lot as a resident's primary dwelling, within a residential zone; and
- Options for proactive enforcement to STRs, including staff requirements and funding options required to carry out the approach.

Existing policies and regulations for STRs, including permit and rental registry requirements, reflect and align with the Municipality's effort to support long-term rental opportunities. To prepare this report, staff

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reviewed policy on STRs and second units and secondary suites, considered the most recent changes to provincial regulations for the registration of STRs, and conducted a jurisdictional scan of 13 other municipalities' approaches to STR regulations and enforcement to inform this report. This report outlines the Municipality's approach and provides recommendations on the following:

- **Secondary and second units:** To protect potential long-term housing stock, a jurisdictional scan showed that most cities prevent the use of secondary units and second units as STRs except where the host resides in the unit as their primary residence. The Municipality's policies currently align with this approach, and no changes to municipal planning documents regarding STRs in second and secondary units are recommended within the Urban Service Area boundary.
- **Rural STRs:** An updated approach to short-term rentals as tourist accommodations in rural areas (communities included within Plan Areas: Eastern Shore (West), Eastern Shore (East), Lawrencetown, Musquodoboit Valley & Dutch Settlement, and Planning Districts 8 & 9) will be included as part of the Phase 4 Regional Plan package (Spring 2025). This approach will allow up to one dwelling unit per lot to operate as a short-term rental. Further engagement is recommended before additional changes are proposed in suburban and African Nova Scotian communities (communities included within the Beaver Bank/Hammonds Plains/Upper Sackville, Eastern Passage/Cow Bay, Planning Districts 14 & 17, and North Preston/Lake Major/Lake Loon/Cherry Brook/East Preston Plan Areas).
- **Requirements for Development Permits:** The Municipality's land use by-laws currently require development permits for short-term bedroom rentals. Long-term bedroom rentals and whole-home STRs operated in an operator's primary residence are exempted from this requirement. This is intended to provide a small incentive for long-term over short-term accommodation, and no changes are recommended.
- **Enforcement:** Proactive enforcement can be achieved through a combination of permit tracking, enhancing education efforts and resource materials, and dedicated staff to investigate noncompliance. Federal funding through the Short-Term Rentals Enforcement Fund has been awarded to support enforcement activities and outcomes.

RECOMMENDATION

It is recommended that Halifax Regional Council:

1. Maintain the current Development Permit requirements for Short-Term Rentals;
2. Maintain the current regulatory approach to Short-Term Rentals of secondary units; and
3. Direct the Chief Administrative Officer to develop a proactive enforcement program for Short-Term Rentals as outlined in the Discussion section of this report.

BACKGROUND

Short-Term Rentals (STRs) are temporary overnight accommodations rented out by property owners or tenants, typically for a few nights or weeks at a time. In recent years, the prevalence and popularity of STRs has grown through online platforms like Airbnb and VRBO. While STRs provide a unique form of tourist accommodation and can have benefits for the local economy, their recent popularity raises concerns about their impact on residential neighborhoods and the availability of properties for long-term rental.

On January 24, 2023, Regional Council gave first reading to proposed amendments to municipal planning documents to establish region-wide policies and regulations for short-term rentals. These amendments were approved following a public hearing on February 21, 2023, and came into effect on September 1, 2023. At first reading, Regional Council requested supplementary reports so that Council could further consider:

- Approaches to STRs in the context of tourist accommodation in rural areas;
- Whether STRs should be permitted in secondary units and second units located on the same lot as a resident's primary dwelling, within a residential zone; and
- Options for proactive enforcement to STRs, including staff requirements and funding options required to carry out the approach.

This report responds to these motions.

Changes to Provincial STR Legislation

Since the STR regulations were adopted, the Province of Nova Scotia introduced changes to the *Tourist Accommodations Registration Act* – now known as the *Short-term Rentals Registration Act*. As of September 2024, Provincial regulations include new host categories and registration rates, new requirements for registration and obtaining a registration number to operate, and increased fines for noncompliant operators. A full list of the provincial requirements is available [online](#).

To register with the Province, operators must provide proof from the Municipality that their STR use complies with the zoning of their property. Requests for Zoning Confirmation Letters and Development Permits issued through HRM Planning and Development increased significantly after the Province announced this change. The process has exposed several noncompliant STRs which were previously unknown. Since the announcement of the new requirements, approximately 689 Development Permits have been requested, with 79% issued, and 448 Zoning Confirmation Letters (ZCLs) requested with approximately 55% of them approved. Currently, a development permit is required to operate most STRs except for whole home residential STRs.

DISCUSSION

Short Term Rentals in Secondary Units and Second Units

In September 2020, Regional Council approved amendments to allow secondary suites and backyard suites accessory to low density dwelling units in all residential zones. In May 2024, Regional Council approved amendments to allow up to 4 units per lot on properties within the Urban Service Area boundary. These amendments were intended to allow for gentle density, provide opportunities for affordable home ownership, and accelerate the supply of long-term rental units in areas where there is traditionally little to no rental supply.

The amendments adopted related to STRs in 2023 aimed to prioritize the protection of long-term housing supply while also making considerations for the region's tourism sector and associated accommodations. The Regional Plan, MPS and LUB amendments included regulations for the following types of STRs:

- 1) Whole Home STRs in Residential Zones: Whole home STRs are only permitted in residential zones where it is the primary residence of the host. This allows a host to offer their home as a STR when they are away but will limit how often a home can be offered as a STR.
- 2) Whole Home Commercial STRs: Commercial STRs are where the operator of the rental does not live in the unit being rented. These can include income properties, seasonal cottages, and basement apartments. Zones that already permit tourist accommodations, such as hotels or motels, were updated to include STRs. STRs are a type of tourist accommodation and therefore should be permitted where similar tourist accommodations are already allowed.
- 3) Short-Term Bedroom Rentals: Short-Term Bedroom Rentals are permitted in both residential zones and zones that allow for commercial STRs. They had replaced the current provisions that apply to Bed and Breakfasts. In residential zones, the host must be the primary resident and must be on site while STR rooms are occupied. Consistent with existing provisions relating to Bed and Breakfasts, provisions relating to short-term bedroom rentals include a limit of bedrooms (up to 3) that can be offered at the same time.

Generally, in urban plan areas (within the Regional Plan's Urban Settlement Designation) commercial STRs are permitted in zones that permit other types of commercial tourist accommodation (hotels, motels, etc.), but only residential STRs are permitted in zones that permit only residential uses. The approach in rural plan areas varies; and is addressed later in this report.

The January 24, 2023, motion passed by Regional Council requested additional information on regulating STRs in secondary units and second units. This is an important consideration to ensure support for tourism accommodation while prioritizing protecting housing availability and affordability. To respond to Council's motion, staff performed a jurisdictional scan that reviewed how other Canadian municipalities approach STRs in secondary units and second units. The scan included 13 municipalities of large and mid-sized cities (Attachment 1).

The jurisdictional scan showed that most municipalities are consistent with HRM's current STR regulation. Some highlights are summarized below:

- To help lessen the loss of rental housing stock, two municipalities (Brampton, Kelowna) explicitly prohibit secondary units from being used as STRs.
- Nine municipalities allow STRs in secondary units and second units with a valid license and only if it is the principal residence of the operator.
- Four municipalities allow STRs in secondary units and second units with valid license/permit or by discretionary approval. This includes Calgary, Edmonton, and London.
- One municipality (Saskatoon) has temporarily suspended the issuance of any new STR licenses or registrations to limit an excess of STR growth.

The approach taken by most municipalities from the jurisdictional scan responds to a scarcity of long-term rental housing stock and supports an intent to keep potential dwelling units part of the long-term housing market. Increased demand from non-principal residence STR operators can have significant impacts on housing availability. If the policy were amended to allow STRs in second units, there is risk that the municipality could experience a loss of long-term housing stock to STRs, contributing to housing shortages.

Compared to many other Canadian municipalities, HRM's STR regulations are more permissive about both the type and number of STRs permitted to support the tourism economy. Staff completed a geographic analysis to illustrate where opportunities for Commercial STR operators continue to exist under the current regulations. The zones shaded in blue on the map provided in Attachment 2 show generally where Commercial STR are permitted within the Regional Plan's Urban Settlement Designation

Based on the findings of this review, staff do not recommend amending municipal planning documents to permit STRs in secondary units and second units within urban areas of the municipality.

Short-term Rentals in Rural Areas

Policy Approach to Rural STRs

The December 13, 2022, staff report pointed to differing contexts for STR use between rural and urban areas of the municipality. Rural communities provide tourism activities including seasonal cottaging that is not as common in urban areas. Rural STRs can also take other forms than those offered in urban areas, such as accommodation in seasonal structures that may not be suitable as year-round housing stock.

Since the enactment of the region-wide STR amendments on September 1, 2023, Commercial and Residential STRs have been permitted in many zones across rural parts of the municipality. However, land use by-law amendments from the late 1990s and early 2000s which introduced "Commercial Accommodation Use" and "Tourist Accommodation" uses are inconsistently permitted across the rural plan areas. Therefore, Regional Council directed further investigation into how STRs should be permitted in rural areas.

Staff performed a review of land use by-laws applying to rural areas. For the purpose of this review, rural

areas were generally considered those that apply outside the Regional Plan's Urban Settlement Designation. Attachment 3 shows generally where Commercial STRs are permitted within rural HRM.

Planning Districts 1&3 (St. Margarets Bay), 4 (Prospect), and 5 (Chebucto Peninsula), currently take an approach to Tourist Accommodation that allows up to one dwelling unit per lot to be used as a STR. This makes up most of the western portions of the municipality. In the eastern portion, commercial uses, including STRs, are permitted by zone. To promote consistency across planning documents for rural communities, staff recommend expanding the approach taken by Planning Districts 1&3 (St. Margarets Bay), 4 (Prospect), and 5 (Chebucto Peninsula) to align across an additional five plan areas that share a similar rural context for residential density and tourism.

This approach supports Halifax Green Network Plan Action 28, which calls for encouraging both small- and large-scale tourism related uses in rural areas, including relaxing restrictions for home-based businesses that cater to tourists, such as bed and breakfast operations, accessory cabins, tour operations, arts and crafts, farms stays, and commercial recreation (such as kayak rentals, etc.). Halifax's Inclusive Economic Strategy and Integrated Tourism Master Plan 2030 also support the growth of the tourism economy in rural communities.

Below is the list of Plan Areas where staff recommend amending applicable land use by-laws to allow for one unit per lot to be used as a STR:

- Eastern Shore (West)
- Eastern Shore (East)
- Lawrencetown
- Musquodoboit Valley & Dutch Settlement
- Planning Districts 8 & 9

Because STR policy is established by the Regional Municipal Planning Strategy (Regional Plan) and implemented through the various land use by-laws, these proposed amendments will be included within the package of amendments in support of the Phase 4 Regional Plan, expected in Spring 2025.

African Nova Scotian Communities and Suburban Communities

Amendments may also be considered to the regulation of STRs for four more plan areas with additional public engagement recommended. These Plan Areas are:

- Eastern Passage/Cow Bay
- North Preston/Lake Major/Lake Loon/East Preston
- Districts 14 & 17 (Shubenacadie Lakes)
- Beaver Bank/Hammonds Plains/Upper Sackville

These plan areas include communities with a range of settlement types, including those that are rural in nature as well as those with a more suburban character. Communities like Fall River, Hammonds Plains and Cow Bay are partially serviced, have a more suburban context influenced by their proximity to the Urban Service Area boundary, and it is not clear the extent to which these areas may be a draw for tourist accommodation. There are also a number of historic African Nova Scotian (ANS) communities in these plan areas, including East Preston, North Preston, Cherry Brook/ Lake Loon, Lucasville and Upper Hammonds Plains. Through the endorsement of the [Road to Economic Prosperity Plan](#) and the [African Nova Scotian Community Action Planning program](#) (ANSCAP), the Municipality has committed to engaging with ANS Communities on any proposed changes to land use regulations that would affect ANS communities. There are active Community Action Planning processes ongoing in [Lucasville and Upper Hammonds Plains](#) (located within the Beaver Bank/ Hammonds Plains/ Upper Sackville Plan Area). Therefore, staff will undertake further engagement with residents of these four plan areas to inform an approach to STR regulations that reflects each settlement context.

STRs as Unusual Lodgings

Unusual lodgings as STRs (defined by the Province as a yurt, dome, stationary recreational vehicle, bunkie or any other form of lodging that is a fixed in place short-term rental and is not a whole home primary residence short-term rental or commercial short-term rental) will also be considered as part of a staff report responding to a March 26, 2024, motion (Item 15.3.1.) examining potential land use zoning changes to allow recreational vehicles (RV's) for residential use.

STR Permit Requirements

The Municipality's approach to STRs seeks to prioritize the protection of long-term housing supply while also considering the needs of the region's tourism sector and associated accommodations. When the existing STR regulations were adopted, each land use by-law was amended to exempt the requirement for a development permit for whole-home STRs in an operator's primary residence. A similar exemption was also put in place for long-term bedroom rentals. The same exemption was not extended to Short-term Bedroom Rentals. The intent was to provide a small incentive in favour of long-term bedroom rentals (i.e., to encourage more opportunities for long-term housing, versus short-term tourist accommodation). For more detail on permit exemption, refer to the December 13, 2022 staff report. Table 1, below, summarizes the permitting requirements for each type of STR uses as well as long-term bedroom rentals (Shared Housing).

Table 1: Development Permit Requirements for Short-Term Rental Uses

Use	Description	Development Permit Required?
Short-term Bedroom Rental	Rental of up to 3 bedrooms (or the maximum number of bedrooms specified in the zone) wholly contained within the dwelling unit that is the primary residence of the operator	Yes
Residential Short-term Rental	A whole of a dwelling unit provided as temporary accommodation by the primary resident of the dwelling for a period of 28 days or less (The host lives in the unit being rented)	No
Long-term Bedroom Rental*	The rental of 3 or fewer bedrooms by the dwelling unit's primary resident, under lease or other occupancy agreement for residential accommodation	No
Shared Housing	The rental of 4 or more bedrooms as separate rooms for residential accommodation; or that are operated by a non-profit organization or a registered Canadian charitable organization that provides support services to the occupants of the shared housing use	Yes
Commercial Short-term Rental	A dwelling unit, or part thereof, that is used mainly for the reception of the traveling or vacationing public and is provided as temporary accommodation for compensation for a period of 28 days or less (The host does not live in the unit being rented)	Yes

**Long-term bedroom rental of 3 or fewer bedrooms is not a defined use in HRM's land use by-laws. It is permitted as part of residential occupancies.*

Recently, staff have received concerns from the public about this approach; in particular, that it is unfair for residents wishing to use short-term bedroom rentals in their primary residence for supplementary income. Short-term Bedroom Rental operators must obtain a Development Permit, whereas operators of whole-home Residential STRs and long-term bedroom rentals (3 bedrooms or fewer) do not. Correspondence on this was received by the Community Planning and Economic Development (CPED) Standing Committee on February 13, 2025, and is included as Attachment 4 of this report.

Development permits include a \$250.00 fee for the processing of the permit. Development permits can also be presented to the Province under the *Short-Term Rental Registration Act* as proof that the STR complies with municipal land use in order to register with the Province. In the case of whole-home Residential STRs where no development permit is issued, hosts must obtain a zoning confirmation letter (ZCL) from the Municipality as proof of land use compliance for the Province. The fee for a ZCL is \$200.00. The Province has indicated that municipal confirmation documents (valid development permits and ZCLs) carry over when renewing a STR's registration so the operator does not need to pay this fee more than once if their STR remains the same. Operators exempt from obtaining a Development Permit, therefore, pay \$50.00 less for confirmation of land use compliance.

The policy intent has been to encourage more long-term housing through bedroom rentals by waiving the permit requirement to rent bedrooms to occupants long-term (i.e., for a period of longer than 28 days in a row); therefore, staff are not recommending further changes to the land use by-laws for this requirement. Should Regional Council wish to amend this requirement, this has been provided as Alternative 1.

STR Enforcement

Effective enforcement is crucial to support the intent of STR regulations. The digital nature of STR platforms requires an enforcement program that is more than voluntary compliance. A proactive enforcement program is key to achieve high levels of compliance, including drawing on dedicated resources and utilizing technology to identify non-compliant operators. The jurisdictional scan shows that nine out of thirteen municipalities conduct proactive enforcement on STR regulations. Four municipalities enforce STR regulations on a compliance basis only, including Brampton, Calgary, Edmonton and Saskatoon.

Based on the jurisdictional scan, key components of proactive enforcement can include the following:

- *Business licensing database*
Business licensing is the most commonly used regulatory tool for STRs. All of the municipalities which staff researched have created and implemented business licensing systems. This would allow the municipality to monitor and validate online STR listings. Many STR regulations, including principal residence, fire safety, zoning requirement, can be enforced through the business license application, review and approval process. A jurisdiction may place an annual limit on the licenses issued, or, like in the case of Saskatoon, implement a temporary moratorium on new licenses for short-term rental properties to regulate their growth.
- *Business license number displayed on online platforms*
Combined with a business licensing program, the majority of the surveyed municipalities require STR operators to display a registered license number in online advertising. This tool is the foundation of a proactive enforcement program, and is normally used as a first step in determining compliance with regulation.
- *Validate online for non-compliant operators*
A combination of methods has been used by municipalities to identify non-compliance. In Vaughan and Victoria, city staff monitor STR listings on platforms on a regular basis and compare with business licensing data for inconsistencies and identify non-compliant listings. Kelowna, Vancouver, Toronto, Mississauga and London, use data scraping services to more efficiently collect STR information, including but not limited to active listings, non-licensed operators and STR locations. City staff review information provided by third party vendors against business rules to validate online licenses and identify non-compliant listings.
- *Enforcement*
When a non-compliant STR is identified, enforcement process normally starts with a notice letter and education of the regulations and licensing process. Further enforcement would be undertaken if this notice is disregarded or compliance is not achieved, including but not limited to the cancellation of an existing license and/or fines related to operating a STR without a license.

Most municipalities are still in the relatively early days of STR regulation. There is very limited information available on the effectiveness of STR regulatory and enforcement tools. Vancouver is the exception where they have already evaluated the performance of their STR program, which indicates that they have experienced continued increase in the long-term rental housing stock since short-term rental regulations were enacted.

Registration Requirements

Both the Municipality and the Province of Nova Scotia manage registries of STRs. These databases serve to maintain up-to-date information on the types and locations of STRs in the municipality. The Municipality also creates and manages case files of noncompliant STRs that are identified through public complaints.

A registry is administered by the Province. Effective since September 30, 2024, the [Short-term Rentals Registration Act](#) requires all platforms and most tourist accommodations, including those operating in their primary residence or attached to a primary residence, to register to operate in Nova Scotia. The provincial regulations now require that operators obtain documentation from their Municipality to prove their STR complies with municipal land-use by-laws. STR operators are required to display the registration number while listing STR accommodations on booking platforms. The regulations also require short-term rental marketing platforms to ensure only operators with a valid registration number are selling short-term rentals through their platforms and to share information covered under the Short-term Rental Registration Act with the Province to support enforcement. The Province is implementing enforcement plans for its program. Penalties for non-compliant operators include fines up to \$100,000 per year of violation.

In combination with HRM's rental registry, the provincial registration will allow a better understanding of the STR market in Nova Scotia and give municipalities access to information needed to enforce their bylaws. HRM is in the process of finalizing an Information Sharing Agreement with the Province, which will give the municipality access to STR registration information, including operator contact information, addresses and number of bedrooms for rent. In combination with clear and consistent rules for where STRs are permitted and with STR registration information, HRM staff will be able to identify non-compliant operators, and follow-up with investigation, education and further enforcement actions.

Planning & Development has been awarded federal funding through the [Short-Term Rental Enforcement Fund \(STREF\)](#) delivered through Housing, Infrastructure, and Communities Canada (HICC). The intent of this program is "to limit short-term rentals that take away units from the long-term housing market ...[by providing] grant funding to municipalities and Indigenous communities with existing strict regulatory regimes to support the local enforcement of short-term rental restrictions in an effort to make more long-term housing units available in Canada".

With this funding, staff are proposing proactive enforcement efforts with initial emphasis on enforcement through education and resource materials to inform the public of municipal land use zoning, permitting, and registration requirements. This information is repeatedly requested from members of the public accounting for significant person-hours by staff and 3-1-1 operators. Education materials can help to reduce confusion and instances of noncompliance.

Staffing & Budget

All surveyed municipalities' enforcement programs are implemented by municipal staff. For municipalities that have proactive enforcement programs, the enforcement team is usually comprised of dedicated staff, including licensing officers, enforcement officers and administrative staff. The number of dedicated STR staff ranges from 1 to 9, depending on the scale of the local STR market. Below are some examples of STR staffing:

- Vancouver has 5-6 enforcement clerks and 1 enforcement coordinator. The team perform license compliance as well as unlicensed enforcement.
- Victoria has 3 staff for licensing and online inspection and 3-4 compliance officers for enforcement.
- Vaughan has 1 staff for STR licensing and property standards officers for site inspections.

Four municipalities (Brampton, Calgary, Edmonton and Saskatoon) do not have dedicated staff as STRs are dealt with like any other business licensing and complaints.

STR enforcement is normally conducted as part of the overall department budget. For that reason, none of the surveyed municipalities has dedicated budget for enforcement just for STRs. Staff's proposal to STREF included the creation of new positions including Planner/Project Managers, Development Compliance Officers, Assistant Building Officials. Staffing action plan is being developed to hire positions based on the awarded funding (to date, \$300,000 for 2025/26). Staffing will account for the majority of budget for enforcement, with additional costs for communications and third party's data support.

Challenges

The nature of STRs as a dynamic market makes its regulation and enforcement context-sensitive and challenging. Various enforcement challenges have been identified through jurisdictional review including:

- It is hard to approve or gather information to support if a license condition is met or not, especially proving whether the rental is the principal residence of the operator.
- It is time consuming and labour intensive to identify STR locations from non-compliant listings since most platform only provide an approximate location. This is especially challenging for municipalities that do not have data sharing agreements with STR platforms nor use data-scraping services.
- A lack of resource and budget to achieve compliance.

While HRM has a strong land use compliance program, proving the presence of an illegal STR can be very challenging. Staff will monitor compliance cases to assess if additional tools are necessary to adequately enforce standards. Staff advise that the Municipality will continue to engage with the Province as it develops STR enforcement plans under the Short-Term Rentals Registration Act. Depending on the outcome of the Provincial approach, the Municipality may wish to consider licensing controls in the future.

Conclusion and Next Steps

Staff have undertaken a detailed review of the Municipality's STR regulations for this report. A summary of the recommendations and next steps for the STR policy and land use by-law recommendations is as follows:

- No further changes to permit commercial STRs in residential zones in urban areas of the Municipality are recommended. Commercial STRs are permitted in zones that permit other types of tourist accommodation, and further permitting them in residential zones could undermine the Municipality's efforts to increase long-term housing supply;
- In rural parts of the Municipality where tourism accommodation is needed, proposed land use by-law amendments will be included within the Phase 4 Regional Plan Review amendment package to permit one dwelling unit per lot to be used as a STR;
- Further land use by-law amendments for suburban-rural areas and ANS communities may be brought forward for consideration by Community Councils following additional engagement in those communities; and
- No further change to development permit requirements for STRs is recommended.

Regarding proactive enforcement, Planning & Development staff will develop a program of work with funding received through the Federal STREF program.

FINANCIAL IMPLICATIONS

The costs associated with any amendments to planning documents resulting from the recommendations of this report can be accommodated within the approved 2025/26 operating budget for Planning and Development.

As acknowledged in this report, compliance will play an integral role in the success of regulating STRs. The enforcement program will be piloted with funding awarded through the federal STREF program for 2025/26 and 2026/27. Future budget needs will be assessed and presented as part of the annual Budget and Business Planning process.

COMMUNITY ENGAGEMENT

An extensive public participation program was completed and presented to support the original Short-term Rental policy and regulations amendments, consistent with the intent of the HRM Community Engagement Strategy. A detailed summary and analysis of feedback received through the public participation program was included in [the staff report](#), dated December 7, 2022.

The recommendations in this report are consistent with the approach set out in the [Public Participation Administrative Order](#) (Administrative Order 2023-002-ADM). Regarding regulations for STRs in rural areas, staff created a [Rural Short-Term Rentals project webpage](#), which explained the proposed approach and listed staff contact information (email and phone number). An online survey regarding Rural Short-Term Rentals was posted on July 23, 2024, and accepted responses until August 19, 2024 (28 days). This survey identified that amendments were not proposed at this time to the Beaver Bank, Hammonds Plains, and Upper Sackville Plan Area, given the ongoing ANS Community Action Planning processes in Lucasville and Upper Hammonds Plains. The response rate of the survey was low (68 respondents). Staff and Council have also received correspondence from residents and various short term rental industry groups advocating for loosening restrictions on STRs, especially in rural communities.

As outlined in the Discussion section of this report, further engagement is recommended before further amendments are proposed for the following Land Use By-laws: Beaver Bank/Hammonds Plains/Upper Sackville, Eastern Passage/Cow Bay; Planning Districts 14 & 17; and North Preston/Lake Major/Lake Loon/Cherry Brook/East Preston. This engagement will follow the Public Participation Administrative Order, and will involve, at minimum, updating the Rural Short-Term Rentals webpage and a 14-day comment period. Specific engagement with ANS Communities will be coordinated with ongoing work on Community Action Planning.

ENVIRONMENTAL IMPLICATIONS

No environmental implications of the recommendations of this report were identified.

ALTERNATIVES

1. Regional Council may choose to direct the Chief Administrative Officer to prepare amendments to all applicable land use by-laws to make Short-Term Bedroom Rental uses exempt from the requirement for a Development Permit.
2. Regional Council may choose to direct the Chief Administrative Officer to initiate the consideration of policy and regulations for secondary and second units that would differ from the current approach as outlined in this report. This may require a supplementary report from staff.

LEGISLATIVE AUTHORITY

Halifax Regional Municipality Charter (HRM Charter):

Halifax Regional Municipality Charter, Chapter 39 of the Acts of 2008 subsections 59(2) and 259(2) provide:

59 (2) The Council may adopt different policies for different areas of the Municipality.

259 (2) A land-use by-law may specify developments for which a development permit is not required.

Minimum Planning Requirement Regulations, under subsection 229(4) of Halifax Regional Municipality Charter, N.S. Reg. 205/2024

2 In addition to the requirements prescribed in subsection 229(1) of the Charter and Section 4, a municipal planning strategy must do all of the following to address the issue of housing supply:

(b) require that priority be given to increasing the supply of safe, sustainable and affordable housing in the Municipality over other interests identified in the municipal planning strategy for the purposes of all processes, approvals and decisions made under the municipal planning strategy;

ATTACHMENTS

- Attachment 1: Jurisdictional Scan of Short-Term Rental Regulations
- Attachment 2: Zones within the Urban Area that Permit Commercial Short Term Rentals (Map)
- Attachment 3: Short-Term Rentals in Rural HRM (Map)
- Attachment 4: Correspondence from CPED Standing Committee meeting (February 13, 2025)

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Attachment 1: Jurisdictional Scan of Short-Term Rental Regulations

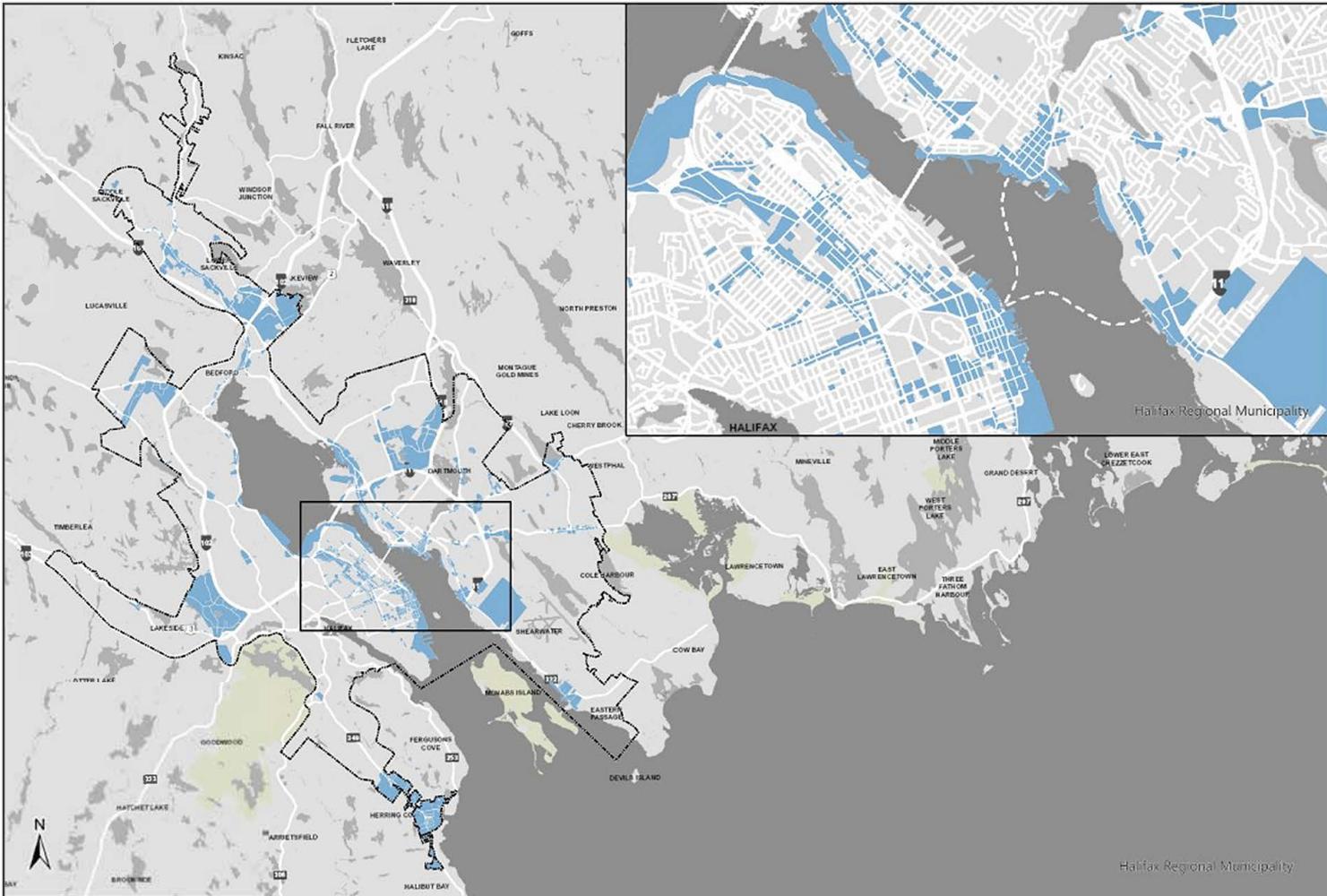
Municipality	Allow STRs in second units on the same lot as a resident's primary dwelling?	Allow STRs in secondary suites on the same lot as a resident's primary dwelling?	Does the municipality have proactive STR enforcement program?	How does your municipality approach the enforcement of non-compliant STRs?	Enforcement program implemented by internal staff or contracted to a third party?	Number of staff are dedicated to STR enforcement	Annual budget dedicated to STR enforcement	Challenges experienced in short-term rental enforcement	Other experience/ recommendation on STR enforcement
Brampton, ON	No, only if it is principal residence . An occupant of a two-unit dwelling is can operate a STR provided they have proof it is their principal residence, written permission from the landlord to operate the STR and satisfies all other application requirements.	Not allowed.	No, complaint based at the moment due to limited resources.	At this time, it is complaint based due to resources.	Internal staff. The STR program is implemented by City staff. They have a third-party service provider that assists with data collection.	The City has 9 licensing enforcement officers that deal with all licensing (Stationary and Mobile) in the City, including STRs.	Brampton does not have a dedicated budget for STR enforcement.	1. Having dedicated resources and being able to lay charges.	Ensuring the By-Law is clear and concise to give enforcement the tools to lay monetary charges.
Kelowna, BC	No, only if it is principal residence and must be operated by a resident who resides for more than 240 days of the year at that dwelling unit.	Not allowed.	Yes , both proactive and compliant-based enforcement.	The city uses Host Compliance to help validate STR listings online, including identifying non-compliant hosts, and track activity of the properties. The city would send letters to the list of addresses identified as non-compliant host and notify them on the following proper actions. The city would request non-compliant hosts to take STR advertisement off the platforms if they are not able to get STRs licensed.	Internal staff.	The City has a STR business licensing team, consisting of 1 clerk and 1 inspector. No enforcement team dedicated to STR. They deal with STR complaints like any other complaints and are responsible for ticketing.	Kelowna does not have a dedicated budget for STR enforcement. It is part of their department budget.	1. Proving an STR is principal residences. 2. Making sure people don't over occupy the property.	NA
Hamilton, ON	No, only if it is principal residence .	No. Only permitted in principal residence with valid business license.	NA*	NA*	NA*	NA*	NA*	NA*	NA*
Toronto, ON	No, only if it is principal residence .	No. Only permitted in principal residence with valid business license.	Yes , both proactive and compliant-based enforcement.	1. As part of ongoing compliance audits, the City uses data discovery techniques to validate short-term rental activity in Toronto. The City also works closely with short-term companies to identify and remove listings that do not have a valid registration number; has missing, inaccurate or incomplete information; or are not in compliance with the bylaw. 2. Residents can contact 311 to submit a complaint about a short-term rental operator. If there is a complaint or information about a possible violation, Bylaw Enforcement Officers investigate, educate and/or take enforcement actions.	Internal staff.	The city as a dedicated STR enforcement team of 9 staff, including 2 supporting staff.	Toronto does not have a dedicated budget for STR, and it is paid through tax base.	1. Proving an STR is principal residences. 2. license fees were not set appropriate in achieving voluntary compliance and cover the program budget. 3. Holding the company accountable and remove any listings that does not match the host official name and address.	1. Creating clear expectations and guidebook for operators. 2. Considering the cost to run STR program and set appropriate license fee to help cover the budget.

Mississauga, ON	No. You can host a short-term rental in a second unit as long as the unit is your principal residence.	No. You can host a short-term rental in a second unit as long as the unit is your principal residence .	Yes, both proactive and complaint-based enforcement.	Mississauga takes public complaints and performs proactive enforcement based off of information from a data scraping provider of unlicensed listings.	Internal staff. Enforcement is performed by Mississauga Municipal Law Enforcement Officers (MLEO).	Mississauga is currently in a pilot program for STR and will be providing recommendations for a permanent framework at the end of the year. Currently the city has a Project Leader and MLEO dedicated to the project.	Mississauga has not finalized what their permanent framework structure or budget will be.	1. The primary challenge is getting hosts licensed. The city has had a great deal of success of obtaining compliance via enforcement action using the data scraping identification of unlicensed addresses however this is only a small percentage of overall hosts and many listings are unable to be identified. More marketing would likely help but ultimately the city needs the host companies (Airbnb, vrbo, etc.) to be better partners in helping them achieve compliance.	1. Using a data scraping service (at least initially) to identify as many listings in the city as you can. 2. When creating your by-law ensure that the city can issue fines for the act of advertising a STR. This lessens the burden of proof needed versus operating. 3. Setting the fine high for advertising/operating without a license high. This will help encourage compliance.
Vancouver, BC	No. Only permitted in principal residence with valid business license	No. Only permitted in principal residence with valid business license	Yes, both proactive and complaint-based enforcement.	The city of Vancouver do receive and act on complaints, but are primarily proactive - running business rules against external datasets (listing and registration data) to identify non-compliant listings using an in-house built tool . Investigation and enforcement are performed by internal staff. The city uses the services of an external vendor to provide raw screen-scrape data of STR listings. They also have an Memorandum of Understanding (MOU) partnership with Airbnb, they provide registration information and include a mandatory municipal license number field in their registration process.	Internal staff. Investigation and enforcement are performed by internal staff.	The city has a STR team comprised of 5-6 enforcement clerks and an enforcement coordinator. STR requires a business license to operate; this team performs license compliance as well as unlicensed enforcement. E.g., verification on all new applications is performed to confirm basic license conditions are met, license issuance and suspensions etc.		1.Lack of authority to compel platforms to remove non-compliant listings 2. The definition of principal residence and resources involved to gather information to support this license condition is met/not met. 3. Locating short-term rental locations from non-compliant listings, especially in high-rise. 4.The time it takes to reach compliance – noting the premise is not available for housing during this time.	Vancouver.ca has info, bylaws and reports to council that fully explain program https://vancouver.ca/doing-business/short-term-rentals.aspx
Ottawa, ON	No. STRs are allowed in a principal residence in the urban area, except where bed and breakfast use is prohibited by the Zoning By-law. Also allowed in a principal residence in rural villages.	No. In a principal residence in the urban area, except where bed and breakfast use is prohibited by the Zoning By-law. Ottawa only allows STRs in secondary suites in rural area other than Rural village.	Yes, both proactive and complaint-based enforcement.	More proactively but we have been doing more reactively depending on the complaint and number of properties we see managed by specific STR manager licensed or unlicensed.	Internal Staff. We do our in-house investigations.	3 enforcement officers, 1 zoning officer and 1/2 administration (2 full time admit to manage the work load)	Not known.	Host tagging the house as primary residence and then not being on site.	In house inspection before issuing permits has reduced complaints for no primary residence.

Vaughan, ON	No. Only permitted in principal residence with valid business license	No. Only permitted in principal residence with valid business license	Yes, both proactive and complaint-based enforcement.	95% of their approach is proactive. The city reviews the STR platforms on a regular basis to identify STR locations operating within the city. Also, since Airbnb are a licensed STR brokerage with the City of Vaughan, they have a data sharing agreement where Airbnb provide them with quarterly rental listing reports . These reports help them identify unlicensed locations.	Internal staff. The entire STR enforcement program is implemented internally with in the city corporation.	Originally there was one licensing officer and one property standards officer. As this enforcement module evolved, they now have a go to person and all our Licensing/Special Enforcement staff can handle any enforcement matters involving STRs. The city has a go to person for licensing and property standards officers for site inspections. When a STR involves a secondary suite, then the city building inspectors get involved to ensure that the construction meets with provincial building guidelines and codes. There is also a fire inspection conducted by the city's fire inspection group.	Vaughan does not have a dedicated budget for STR enforcement, it is all looped into the overall department budget.	<ol style="list-style-type: none"> 1. Identifying locations is time consuming and labour intensive. The STR platforms will only provide an approximate location, so having a data sharing agreement with Airbnb makes this process a lot easier. 2. Initially challenges involved the operation of party houses. This can still be an issue, but Airbnb as well as other platforms have implemented strict policies against party houses and any property where criminal activity has occurred due to being a STR. 3. Other challenges may involve property standards issues, noise issues, zoning and parking issues. These are all enforcement matters that should be taken into consideration and can be acted on when required by the city/town. 	<ol style="list-style-type: none"> 1. Regular reviews of STR platforms, it is important to stay up to date on rental status of STR properties in your city. 2. Immediate enforcement of all by-law requirements. STR operations can get out of hand quickly so it is important to make it known that there is an enforcement plan in place in your city. 3. Zoning enforcement is also crucial, again STR's will pop up all over if allowed. May consider restrict them to certain areas within the city.
Victoria, BC	No. Only permitted in principal residence with valid business license	No. Only permitted in principal residence with valid business license	Yes, both proactive and complaint-based enforcement.	The city of Victoria's STR enforcement are primarily proactive. They actively review STR platforms and identify listings that are not valid, or no license registered.	Internal staff. The city's STR enforcement was contracted to a third party during 2018-2020. Now it is enforced totally by internal staff.	The city has a dedicated STR team for licensing and enforcement. Around One and a half staff is dedicated to licensing. One and a half staff is dedicated to online inspection. 3-4 compliance officers are dedicated to STR enforcement.	STR licensing and enforcement program is self-funded through their business license fees. Victoria issues around 600 STR license a year.	<ol style="list-style-type: none"> 1. Identifying locations is hard, especially for single-unit dwellings 2. Proving if the STR is used as a principal residence 3. Proving the nights cap is reached is hard 	check report: https://www.ubcm.ca/sites/default/files/2021-11/Policy%20Areas_Housing_Priorities%20for%20Short-Term%20Rentals%20Report_2021-10.pdf?fbclid=IwAR0bp4b8mSmXOPzMa9Xnftys6f83u9FMx8M0ts6qoB3HYZR1jGh9kRV4VI&mbextid=Zxz2cZ
Calgary, AB	Yes, permitted with a valid license.	Yes, permitted with valid license.	No, complaint-based enforcement.	Calgary's STR enforcement is complaint based.	Internal staff. Calgary's enforcement is completed internally by their Business Safety Peace Officers.	The city has 10 Peace Officers split into zones; complaints are dealt with as they come in by the zone Officer. They do not have 1 dedicated staff member.	Calgary does not have a specific budget allocated to STR's as they are just dealt with like any other complaint received about a business.	<ol style="list-style-type: none"> 1. The biggest challenge has been not having address listed on platform sites. 2. Other challenges include receiving complaints days after the incident, proving who is using the STR, accessing people private residences, lack of solid evidence for enforcement. 	Calgary recently made amendments to their bylaw which include mandatory fire inspection with an approved floor plan, approval from the homeowner and/or condo board and improvements to our good host and good neighbor guide. These changes will take place January 2024.
Edmonton, AB	Yes, A valid home-based Residential Rental Accommodation (Short-Term) business license is required for each property that is available for short-term home rental.	Yes, A valid home-based Residential Rental Accommodation (Short-Term) business license is required for each property that is available for short-term home rental.	No, complaint-based enforcement at the moment.	At this time, they are more complaint based. For non-compliant STR they will proceed with enforcement and a ticket if they have all elements to meet the charging section. However, in the past they used a company called Host Compliance during an active STR pilot project. Host Compliance had a list, mapping and all active STR. This allowed Edmonton to be proactive.	Internal staff. All of Edmonton's front-line staff who enforce business licensing enforce STR, it is enforced internally.	Edmonton used to have a team of 4 during a proactive Pilot project, now their front line officers and business license officers (if fully staffed) take STR on a complaint basis .	No allocated funds for STR dedications as it is a part of their officers outlined duties.	1. STR can be hard to prove (especially without host compliance) if officers are unable to obtain proof of advertising or proof of transaction; however there is circumstantial evidence to suggest the business is in operation.	Contacting Airbnb ,Vbro, and Host Compliance as a great resource. Also, Edmonton's STR enforcement falls under operating without a valid business license and/or a development permit (pending the type). They also track other bylaw infractions that happen at known STRs.
London, ON	Yes, In most cases you will also be allowed to use one other dwelling unit as an	Yes, In most cases you will also be allowed to use one other	Yes, both proactive and complaint-based enforcement.	Enforcement is both complaint-based and proactive. They sometimes identify STAs through other complaints on the property,	Internal staff. The enforcement is implemented by internal staff, however	There is 1 primary supervisor and 2 dedicated officers who do the enforcement work at the	London did not receive any budget for this project. They run it through the	<ol style="list-style-type: none"> 1. Identification and obtaining hard proof of STAs. 2. Operators using their (long term) Rental Licensing as loophole to get out 	1. Take the time to set up ALL the processes before trying to enforce will save a lot of headaches. Don't rush.

	<p>STA, but the unit must be legally established and on the same property as your resident address; a secondary dwelling unit, a converted dwelling with two units, etc. may be permitted to be used. Therefore, you may be able to have up to two STAs registered under your name, at the same address.</p>	<p>dwelling unit as an STA, but the unit must be legally established and on the same property as your resident address; a secondary dwelling unit, a converted dwelling with two units, etc. may be permitted to be used. Therefore, you may be able to have up to two STAs registered under your name, at the same address.</p>		<p>complaints from citizens, and through the program “Host Compliance” that scrubs platform websites such as AirBnB and identifies STAs for them.</p>	<p>they use a 3rd party program “Host Compliance” to identify hosts, send letters, and track activity of the properties. All properties are reviewed by staff for activity and individually ticketed by staff based on what activity is provided by Host Compliance and their review.</p>	<p>moment. Eventually they will use our entire MLEO compliment to enforce these as part of their regular duties – no “dedicated staff”.</p>	<p>existing program budget.</p>	<p>of needing STA license. This causes them to monitor each property to ensure they are complying and having them put in the ad description that the rental is 30 days or more only. 3. At the moment the amount of STAs to enforce. They have more volume than we imagined. 5. Proving that the rental is (or is not) the principal residence of the host/owner. 6. Properties remaining on websites, showing as “active” when the owner says they tried to have it removed. Their bylaw states it cannot be posted without a license, but some sites refuse to remove listings. The city then need to have them blocked or restricted from booking, and monitoring monthly to make sure they are not re-activated.</p>	<p>2. Really consider what the goal of doing this is and create a by-law that addresses the desired outcomes: What are you regulated and why? Will the by-law you create have the desired effect and outcome. 3. They are awaiting the hearing outcomes re. hosts charged with Penalties for operating without a license. This will give them some more matters to think about.</p>
<p>Saskatoon, SK</p>	<p>Yes, Discretionary use approval is required in the following residential zoning districts: R1, R1A, R1B, R2, R2A, RMHL, RMTN, RMTN1, RM1, RM2, RM3, and RM4. However, as of January 31, 2024, a moratorium has been declared, preventing any new licenses to be issued for STRs</p>	<p>Yes. A license for a homestay is only required when hosting guests in a secondary suite or hosting more than two guests in your home. However, as of January 31, 2024, a moratorium has been declared, preventing any new licenses to be issued for STRs</p>	<p>No, complaint-based enforcement.</p>	<p>Enforcement primarily complaint based. When a complaint is received regarding a non-compliant STR, they typically start by having staff contact the host directly to explain the regulations and licensing process. Further enforcement would be undertaken if this notice is disregarded or compliance is not achieved, including but not limited to the cancellation of an existing license and/or fines related to operating a business without a license, which are up to \$25,000 for each day the offence occurs. To help reduce non-compliance, they work with hosting platforms to disseminate information to its host members.</p>	<p>Internal staff. Any enforcement activity would be conducted by internal staff.</p>	<p>No staff are 100% dedicated STR enforcement. The City of Saskatoon licenses all businesses. All STR work in process is administered under that umbrella.</p>	<p>Enforcement is conducted as part of the overall business license program. For that reason, there is no dedicated budget for enforcement just for STRs.</p>	<p>1. Identifying and collective evidence that a property is being operated as an STA 2. Confirming if the STR it the host’s principal residence. 3. Ensuring that all eligible hosts have obtained a license 4. Challenges contacting and working with all hosting platforms</p>	<p>NA</p>

*Responses to questions about STR enforcement were not received from the City of Hamilton.



HALIFAX

Attachment 2

Commercial STR Permitted in Urban Settlement

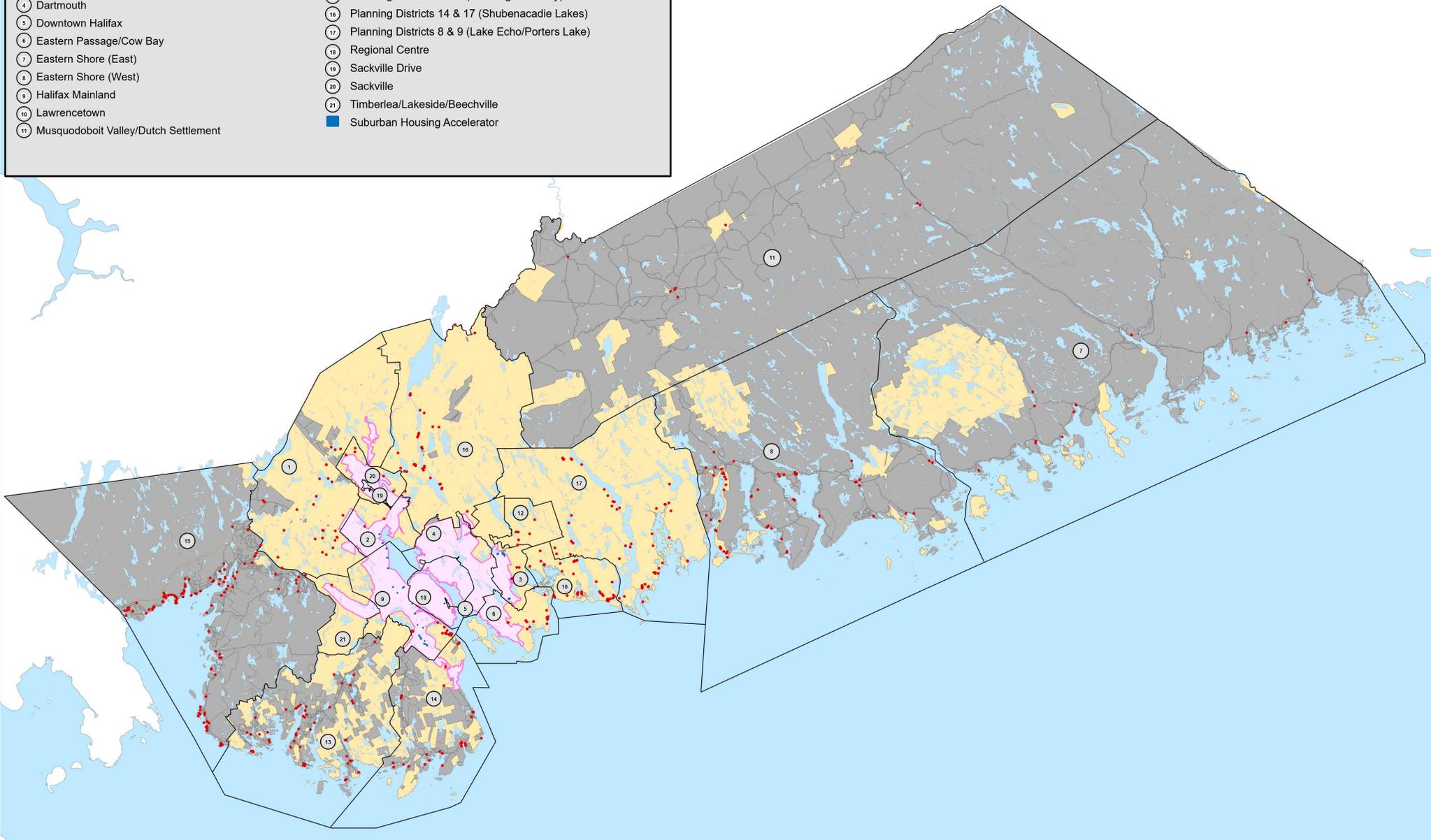
- Commercial Short Term Rental Allowed
- Urban Settlement Boundary



The accuracy of any representation on this plan is not guaranteed.

Plan Area

- 1 Beaver Bank, Hammonds Plains and Upper Sackville
- 2 Bedford
- 3 Cole Harbour/Westphal
- 4 Dartmouth
- 5 Downtown Halifax
- 6 Eastern Passage/Cow Bay
- 7 Eastern Shore (East)
- 8 Eastern Shore (West)
- 9 Halifax Mainland
- 10 Lawrencetown
- 11 Musquodoboit Valley/Dutch Settlement
- 12 North Preston/Lake Major/Lake Loon/Cherry Brook/East Preston
- 13 Planning District 4 (Prospect)
- 14 Planning District 5 (Chebucto Peninsula)
- 15 Planning Districts 1 & 3 (St. Margaret's Bay)
- 16 Planning Districts 14 & 17 (Shubenacadie Lakes)
- 17 Planning Districts 8 & 9 (Lake Echo/Porters Lake)
- 18 Regional Centre
- 19 Sackville Drive
- 20 Sackville
- 21 Timberlea/Lakeside/Beechville
- Suburban Housing Accelerator



Short-Term Rentals (STR) in Rural HRM

Attachment 3

- Approximate Location of Existing Airbnb or Vrbo Rental in the Rural Area as of October, 2022
- Commercial STR Permitted within the Rural Area

- Areas where Commercial STR are Currently Not Permitted within the Rural Area
- Urban Settlement Boundary (STR Permitted Areas and Approximate Locations Excluded)

HALIFAX



The accuracy of any representation on this plan is not guaranteed.

Attachment 4. Correspondence

From: [REDACTED]
To: [Ross Siegel, Simon](#)
Subject: [External Email] Re: RE: CPED - URGENT - New Virtual Meeting Format
Date: Wednesday, February 12, 2025 2:51:11 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image004.png](#)

[This email has been received from an external person or system]

Good afternoon Mr. Ross Siegel, the following is the text of the correspondence that was sent by me to the Clerks office to forward to the Mayor and Council. Please forward it to the CPED committee :

I wish to bring to the attention of the CPED Committee concerns and questions faced by many homeowners like myself in HRM who have a spare guest room in their primary place of residence which they choose to rent out short term of 28 days or shorter (STR) vs 29 days or longer when it is classified as a long term rental (LTR). The concern is regarding recent changes to the municipal rental regulations that mandates the requirement of a Development Permit and an associated \$250 fee for an existing guest room rented in one's primary place of residence if rented as a STR but waives the requirement of this Permit and fee if the same room is rented as a LTR for 29 days or longer.

Janet Steele, my local councillor has been in correspondence with me the past couple of weeks and most recently called me on on the 7th of December on the matter. She understands the situation and my reasons for pursuing this matter all the way with various staff in in the Planning and Development

department up to most recently with Erin MacIntyre, Director of Development Services. I raised this concern earlier with Sean Audas (Development Services within Ms. MacIntyre's department) before Ms MacIntyre was needed to step in to assist in her role as Director of his department.

The concern is on the aspect of government overreach by modifying the existing STR legislation and fees to coerce/encourage private homeowners to rent a guest room as a LTR when the homeowner has legitimate personal reasons to rent it as a STR . The reason for this legislation is based on recommendations in the Dec. 13/22, updated Feb. 21/23 Case 22423 Report (Regulation of Short Term Rentals) by Staff to Council to address the shortage of long term affordable accommodation in HRM.

Long term rentals of guest rooms in a home will negatively affect a homeowner's long term ability to enjoy living comfortably in their own home and also prevent the guest room or rooms in their home to be available for out of town friends or family who may want to visit them during holidays or special occasions as a consequence of it being rented out long term. A renter staying in one's residence long term could also adversely affect the personal life of the homeowner to enjoy his/her home that they invested time, personal energy/effort on and money in for many past years.

Any such homeowner in HRM would also consider this government overstepping its authority into what is clearly a

decision that a homeowner should be able to make for the use of rooms in his/her own private home.

I raise this issue because I depend on the income from occasionally renting the guest room in my home to meet my home ownership/maintenance bills. I am not in a position based on my December financial budget to unnecessarily spend \$250 for a Development Permit on top of a \$50 STR/RYA ("register your accommodation") Provincial registration number renewal fee that requires one to get a Compliance Letter from the Municipality stating a homeowner meets all Municipal Land Use regulations (including the Development Permit for a STR) so he/she can advertise such a guest room on platforms like Airbnb.

I should add as an aside that it is a bit ironic that the Municipal government considered it overreach in Oct. 2023 when the Provincial government introduced Bill 329 which would give the Provincial Housing minister power to approve any development in HRM which currently falls within the jurisdiction of Municipal government:

<https://www.halifaxexaminer.ca/government/province-house/halifax-considers-taking-nova-scotia-to-court-over-controversial-housing-bill-329/>

Following is a quote from the above link:

"Bill 329, which was introduced in the legislature last Friday, would give Housing Minister John Lohr power to approve any development in HRM.

As [Jennifer Henderson reported Wednesday](#), Housing Minister John Lohr is “absolutely committed” to pushing Bill 329. That legislation could be passed as early as Friday.

At the legislature’s law amendments committee on Monday, Halifax Mayor Mike Savage called Bill 329 “[egregious overreach](#).” CAO Cathie O’Toole, municipal solicitor John Traves, and other HRM staff were also present.”

Many like myself consider renting accommodation in their homes to help manage the rising cost of owning a home and paying taxes, insurance, maintenance, etc.. Unlike commercial operators, others like myself are not doing it as a commercial venture like developers and contractors who are also likely 6 figure income earners and can afford the \$250 Development Permit fee. If I was making a 6 figure annual income, I would not choose to rent accommodation in my home. My December budget with all the other end of year expenses does not allow me to spend an extra \$250 for a Development Permit. I cannot pass this on by raising my rent as good potential renters will look elsewhere to find less expensive comparable accommodation.

Currently I have nobody renting the guest room as Airbnb cannot advertise it without me providing them a new STR/RYA number as they have to post this number on the listing as per Municipal government regulations recently imposed on such digital platforms as of September 30th of this year. In order to get a STR/RYA number the Province needs me to show my accommodation is in compliance with all Municipal Land Use regulations which includes getting a Municipal Development permit and paying the \$250 fee if the guest room in my home is rented out as a STR.

Homeowners like myself would be more motivated to open available rooms in their homes as STR's to offer good affordable accommodation which would then promote tourism in N.S. and also assist with the housing shortage in HRM while more long term housing is being constructed if the \$250 Development Fee is either waived like for LTR's or if this fee is significantly reduced. It would be a win/win/win situation for homeowners, the Provincial and the Municipal government. With the status quo, it would be a lose/lose/lose situation for all 3 groups if I and other homeowners remove our available accommodation from the Tourism Registry due both to the high \$250 fee and to all the time and effort required to comply with regulations imposed by now 2 levels of government. In past recent years I needed to only pay a \$50 registration number renewal fee to the Province and report monthly, any income made to the Municipality and pay a 3% Marketing Levy on this income. Keep in mind that prior to 2022 there was also no Marketing Levy. Now homeowners have to pay this fee as well as the annual \$50 fee for renewing the Provincial registration number plus the one time \$250 Development Permit fee.

My home is in a R1 zone meaning under Land Use regulations, I can rent spare rooms in the home. The guest room in my home was already part of the home when it was built like the other bedrooms in the house and it has not been developed or modified in any way when it is used as an occasional rental. Some of my renters in the past have stayed for less than 28 days while others have stayed longer. Thus it could qualify as

both an STR where under current legislation a \$250 Development Permit is required whereas it also has been rented as a LTR (longer than 28days) whereby the Permit and fee are not required. It is a bit convoluted the way the legislation is applied and being faced many homeowners in HRM in a similar situation who rely on STR income in their private place of residence to meet home ownership costs.

I must also mention that I have a 5 star rating with Airbnb and have reached Superhost status on its platform which indicates that all the renters have been pleased with me and the room I rent in my home and that I have had all very favourable reviews. I must emphasize it is not easy for a host to attain this standing on Airbnb. I have had a neurologist from Germany visit Nova Scotia as a tourist and stay in my home while in Halifax as well as a medical student from Taiwan stay with me while on an exchange program over the summer where he was working with a medical researcher at Dalhousie medical school. Another person was a German University student who came to Halifax for a summer work term at a local business that sponsored him to do the practical course requirement for his degree at his University in Germany. Another person who stayed with me came to Halifax from Ontario to do his practical training at a local drug store after completing his Pharmacy course requirements towards a Pharmacy degree in Ontario. This is a few of the many other renters I have hosted in the past. Also many renters have come to Halifax or N.S. for the first time and take time to sightsee the many wonderful aspects of the province and of the city and have enjoyed their stay. They also patronize many businesses here in the city

during their stay in my accommodation.

I have spent a lot of time and effort screening many people who apply to rent my guest room. I must be satisfied with the potential renter and the renter must also be satisfied with me and the accommodation in my home. I only rent the room if there is a good match between my accommodation and a potential renter.

If I am forced to pay the full Development Permit \$250 fee, I will have no option but to remove my accommodation from the Provincial Tourism Registry. I want to repeat that this would be a lose/lose/lose situation. I will lose for obvious reasons. The Province will lose since a well proven affordable accommodation that has received good reviews by tourists to this province has been removed from its Tourist Registry. Finally the Municipality will lose as the city is losing availability of an accommodation at a time it is trying to address the shortage of good affordable accommodation in HRM for those seeking short term accommodation while waiting for affordable long term accommodation to be constructed or become available for rent in the near future. Making modifications to the existing municipal legislation to exempt homeowners like myself from the \$250 Development Permit fee when just renting a guest room in their place of residence to simply cover their home ownership bills would go a long way to a win/win/win situation for homeowners, the Province and the Municipality and frankly for tourists and other renters as well who are looking for affordable short term rentals that meet the accommodation standards of Airbnb and

also comply with the physical STR requirements as per Municipal regulations.

I can provide photos etc. to prove my accommodation meet the 5 physical Municipal requirements for operating a short term bedroom rental. Aiden MacFarlane who also works for the Municipal Planning and Development Department as a Planner 1 in Land Development and Subdivision, sent me these requirements on October 16th. Kyle Peters and Krista Macdonald are Municipal Processing Coordinators in Planning and Development also have sent me general information on STR regulations in early September of this year.

I know often when legislation is applied to a broad range of situations, often it has unintended consequences on certain groups of individuals and case by case exceptions can be made if these individuals make a legitimate case for the exemption. I hope you also understand the urgency in getting this concern addressed before the holidays and the end of the year as in the New Year there will be a host of other new matters for Council to deal with and this concern of homeowners like myself (who is also a senior citizen on modest income and who simply wants to live peacefully in his own home) will be further delayed.

Thank you.



p.s.: there is also a question if the Municipality has the legal