

# CITY OF NANAIMO

## Rental Tenant Relocation Assistance Project

Best Practices Report | February 2026



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## Introduction

Residential apartment buildings with rental housing units provide important affordable housing in the City of Nanaimo. Residents living in older rental apartment buildings can be vulnerable to displacement and may have limited affordable options when their properties are considered for redevelopment. The Rental Tenant Relocation Assistance Project will propose protections, beyond Provincial requirements, for residents whose tenancy is terminated when a property is considered for redevelopment.

*City Plan: Nanaimo ReImagined* policy encourages “requiring tenant relocation plans as a condition of rezoning or redevelopment of existing mobile home parks and purpose-built rental buildings of four or more units” (C3.2.15). A priority action in the *Integrated Action Plan* is to “create a tenant relocation policy to support tenants impacted by redevelopment and displacement.”

## Provincial Legislative Context

In late 2023, British Columbia introduced the Local Government Housing Initiatives (LGHl) to promote proactive planning and zoning, which included legislative amendments that help local governments deliver housing faster, monitor redevelopment impacts, and support tenants facing eviction.

In April 2024, the Province passed *Bill 16 – 2024 Housing Statutes Amendment Act, 2024* that provides municipalities with the authority to develop a tenant protection bylaw (TPB). The bylaw allows municipalities to require property owners and developers to provide added support to tenants facing displacement due to redevelopment. Supports may include financial assistance, moving assistance, help to find a home, and/or the right to enter into a new tenancy agreement with the owner.

Before April 2024, municipalities utilized the rezoning process to implement tenant protections, with some cities establishing dedicated tenant protection policies for this purpose. With the enactment of Bill 16, municipalities now possess the authority to secure tenant protections for any redevelopment, irrespective of whether a rezoning is necessary.

## NEW TENANT PROTECTION AUTHORITIES

Recent amendments to the *Community Charter* (CC) and the *Local Government Act* (LGA) also grant local governments the authority to establish a new category of Development Permit Areas (DPA) specifically for tenant protections. These amendments can require Development Approval Information (DAI) to assess the potential impacts on tenants resulting from redevelopment activities. Municipalities are now empowered to adopt Tenant Protection Bylaws (TPBs) and enforce compliance with these bylaws through the development permitting process. A Tenant Protection DPA must be created to require compliance to the TPB as a condition of a development permit.

Should a municipality implement a TPB without concurrently designating a Tenant Protection DPA, enforcement would default to standard bylaw compliance mechanisms. This method could prove administratively complex and may fall short in providing adequate support to tenants affected by redevelopment.

Table 1: Regulatory Tools Comparison

Regulatory Tool	Mechanism	Implementation	Enforcement	Benefits
Tenant Protection Policy	Rezoning negotiations	Require reporting	No clear mechanism <sup>1</sup>	Tenant protections for redevelopment (rezoning only)
Tenant Protection Bylaw	Adopt a bylaw	Require reporting	Bylaw enforcement tools	Tenant protections for all eligible redevelopment <sup>2</sup>
Tenant Protection DPA	Amend Official Community Plan	Compliance with TPB via development permit within DPA	Accountability measures throughout development process	Tenant protections in specific areas (or city-wide), embedded in the development permit process
Development Approval Information	Amend Official Community Plan + adopt a bylaw	Compliance with DAI bylaw	Bylaw enforcement tools	Information only

## RESIDENTIAL TENANCY ACT

Tenants in rental apartment buildings are protected by the *Residential Tenancy Act* (RTA), which comes into effect when a landlord plans to end a tenancy agreement. TPBs do not override the RTA, but instead supplement it and address areas the RTA may not cover.

## Financial Compensation

Under Section 49 of the RTA, when a landlord applies for an Order of Possession to end a tenancy, the tenant protections include:

- Four months' notice to end tenancy for demolition, conversion, or extensive renovations / repairs that require the unit to be vacant;

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1. There is no clear legal authority to enforce tenant protection policies; however, some municipalities have required compliance via development process and other mechanisms, such as security bonds.  
 2. A Tenant Protection DPA must be created to require compliance to the TPB as a condition of a development permit.

- Two months' notice to end tenancy for landlord use of property (e.g. Landlord or close family member moving in), and
- One month's rent (usually applied by making the final month rent-free).

A TPB may also require additional financial compensation for ending a tenancy due to redevelopment. Section 63.3 (2) of the *Community Charter* states that if an owner is required to pay financial compensation under both schemes, the RTA amount must be deducted from the TPB compensation.

### Renovictions + Demolitions

Section 49.2 (2) of the Residential Tenancy Act (RTA) addresses situations where tenancies are terminated due to renovations or repairs, specifically for residential properties with five or more rental units. Under this section, tenants are entitled to enter into a new tenancy agreement for the renovated unit.

Section 49 (6) of the RTA pertains to instances involving the demolition or partial demolition of a rental unit, resulting in the unit's cessation. In these circumstances, tenants do not possess a right of first refusal (ROFR) to enter into a new tenancy agreement.

While a TPB would not apply in cases of renovictions, it may serve an important role by closing gaps in tenant protections, such as offering ROFR, when demolitions arise during redevelopment projects.

### STRATA CONVERSIONS

The *Strata Property Act* [Chapter 43, Part 14] governs conversion of previously occupied buildings, with Section 242 addressing approval and factors such as **relocating residents**. Municipalities like Nanaimo have policies limiting strata conversions of residential rentals (four+ units) when vacancy rates are below 3%. No issues have arisen locally due to consistently low vacancy rates since 2014 and the high costs of meeting current BC Building Code for conversions.

The 2024 vacancy rate was 2.9%, driven by more rental buildings being constructed recently. As Nanaimo's property values rise, redevelopment and strata conversion of existing rentals may soon be economically viable.

Bill 16 provides authority for tenants facing displacement due to redevelopment, defined as demolition or partial demolition of residential property. Strata conversions

may not involve demolition and therefore would not be covered under a TPB. Instead, municipalities can create tenant protections within their strata conversion policies. For example, the City of Abbotsford requires a tenant relocation plan with options for purchase, including the right of first refusal and relocation assistance.

## Nanaimo Rental Context

The City of Nanaimo has 126 active business licences for rental apartment buildings, which collectively provide approximately 4,200 rental units. Additional rental buildings may exist within the city that do not hold business licences; these typically consist of properties with four or fewer units or older buildings that have not undergone recent ownership changes.

Between 2020 and 2025, the City saw four redevelopment projects with four or more units; three were non-profit housing, each likely managing tenant relocation independently.

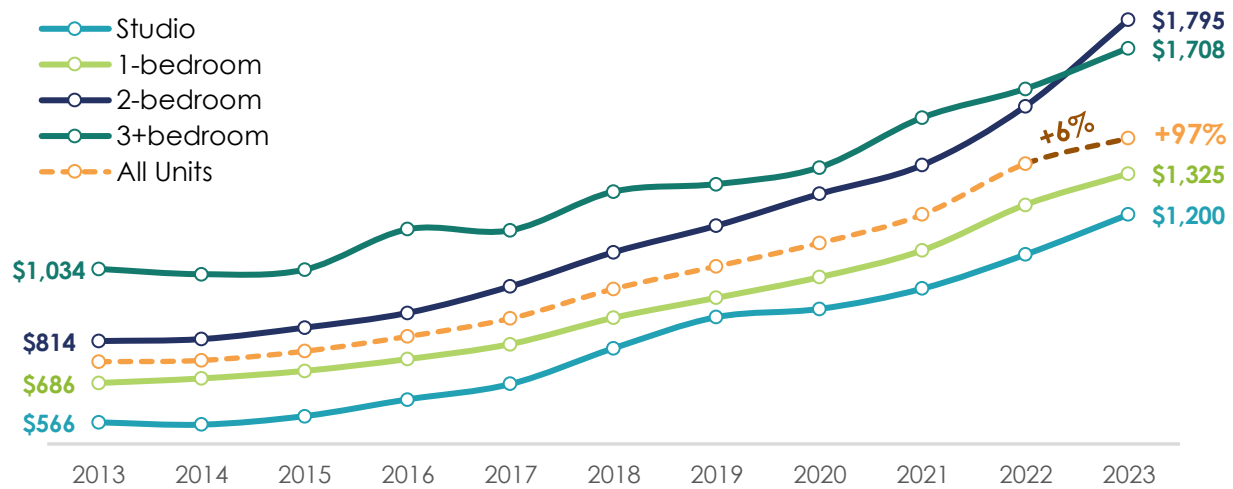
Table 2: Redevelopment Projects (2020 to 2025)

Development Type	Building Type	# Units Demo	# Units Built	Mechanism
Non-Market Ballenas Housing Society	Low-rise apartments	62	116	Rezoning
Non-Market BC Housing	Townhouses	34	199	Rezoning
Non-Market Pacifica Housing Advisory Association	Townhouses	34	160	Redevelopment under current zoning
Market	Two low-rise apartments	10	760	Rezoning

Since 2012, Nanaimo rents have nearly doubled (+97%), with a 6% rise from October 2022 to October 2023. Median rent for a two-bedroom increased from \$814 in 2013 to \$1,795 in 2023. While the 2024 vacancy rate is 2.9%, close to the healthy range of 3 to 5%, high rents likely keep many units unaffordable.

Figure 1: Median Rents by Unit Size, Purpose-Built Rental, 10-Year Change (2013-2023)

Source: City of Nanaimo Building Permit Data. Nanaimo City Plan. Census of Population, Core Housing Need, City of Nanaimo.



In 2021, 3,350 renter households (24.2%) faced Core Housing Need by spending over 30% of their income on housing. Displacement can lead to higher rents and added financial and social burdens, including moving and transportation costs and loss of community ties.



## Research Methodology

This report reviews tenant protection bylaws and policies across 10 British Columbia municipalities. The City of Kelowna, City of Surrey, and City of Victoria have adopted TPBs, while seven others use tenant protection policies; several are considering new TPBs. The research aims to compare rental protection practices to guide future strategies for the City of Nanaimo. Reviewed municipalities were chosen from a list evaluated by the City of Nanaimo, with Victoria included. Municipalities and related bylaws and policies include:

- City of Burnaby's Tenant Assistance Policy;
- City of Coquitlam's Tenant Relocation Policy;
- City of Kelowna's Tenant Protection Bylaw;
- City of Langley's Updated Tenant Relocation Plans (Policy);
- City of Revelstoke's Manufactured Home Park Redevelopment, Residential Tenant Protection, and Strata Conversion Policy;
- City of Surrey's Surrey Tenant Protection Bylaw;
- City of Victoria's Tenant Protection During Redevelopment Bylaw;
- City of White Rock's Tenant Relocation Policy;
- District of North Vancouver's Residential Tenant Relocation Assistance Policy; and
- District of Saanich's Tenant Assistance Policy.

A comprehensive desktop research process was undertaken to identify and summarise the key components of each bylaw or policy within comparison tables. The typical elements of a TPB are referenced from the BC Ministry of Housing and Municipal Affairs' *Provincial Policy Manual: Tenant Protection Bylaws*. These elements encompass the regulatory framework, scope and eligibility criteria, financial compensation, redevelopment notification protocols, provisions for moving or financial assistance, and the right of first refusal (ROFR). Additionally, the role and function of tenant relocation coordinators have been incorporated as a distinct component. Further details pertaining to each component are outlined in the subsequent sections.

# Municipal Scan

## Regulatory Framework

### TENANT PROTECTION BYLAW VERSUS POLICY

A Tenant Protection Bylaw helps tenants who are displaced by redevelopment, which is defined as the demolition or partial demolition of a residential property. Before this legal authority existed, many municipalities created their own tenant protection policies that depended on rezoning negotiations, since they lacked an official legal framework. Some municipalities might still prefer using policies instead of bylaws and Development Permit Areas, as policies can offer greater flexibility.

### TENANT PROTECTION DEVELOPMENT PERMIT AREA

A Tenant Protection Development Permit Area (DPA) is designed to highlight locations facing development pressure and require developers to take steps to reduce tenant displacement. The DPA must include clear guidelines on how the impacts of displacement will be managed and can be applied across the entire city or focused on particular places, such as neighbourhoods with older buildings or Transit Oriented Areas. To create a Tenant Protection DPA, the Official Community Plan (OCP) needs to be amended so that municipalities can make compliance with the TPB a condition for receiving a Development Permit. If a TPB exists without an accompanying Tenant Protection DPA, the municipality would use standard bylaw enforcement tools to ensure the regulations are followed.

### IMPLEMENTATION + ENFORCEMENT MECHANISMS

Accountability mechanisms for tenant protections can be included throughout the development process. Municipalities can require information and reporting prior to issuances of demolition, development, building, and occupancy permits. Compliance with the TPB can also be enforced via standard bylaw enforcement tools, including municipal ticketing, bylaw notice, and the *Offence Act*.

Table 3 compares the regulatory tools used by each municipality with an adopted tenant protection bylaw.

Table 3: Comparison of Regulatory Tools by Municipality

Municipality	Regulatory Tool	Implementation	Enforcement
City of Surrey <sup>3</sup>	Tenant Protection Bylaw	<ul style="list-style-type: none"> <li>Rental Housing Redevelopment Form required in applications that demolish six+ rental units</li> <li>Interim Tenant Assistance Report: required before Final Approval (issuance of Development Permit or Rezoning Bylaw)</li> <li>Final Tenant Assistance Report: required prior to issuance of an Occupancy Permit</li> <li>Status of Replacement Units, including six months prior and on or about the date that is 45 days prior to the Owner's anticipated receipt of Occupancy Permit</li> </ul>	<ul style="list-style-type: none"> <li>Offence Act (fines of not less than \$100 and not exceeding \$10,000)</li> <li>Municipal Ticketing Bylaw (fines up to \$1,000)</li> <li>Bylaw Notice (fines up to \$500)</li> </ul>
City of Kelowna	<ul style="list-style-type: none"> <li>Tenant Protection Bylaw</li> <li>Development Permit Area</li> <li>Development Application Procedures Bylaw Amendment</li> </ul>	<ul style="list-style-type: none"> <li>Apply for a Tenant Protection Development Permit, including submission of a Tenant Protection Plan in accordance with the Terms of Reference</li> <li>Submit a Compliance Report prior to issuance of Demolition or Building permit</li> </ul>	<ul style="list-style-type: none"> <li>Development Application Procedures Bylaw Amendment (requirements for Tenant Protection Development Permit) and enforced by Building Bylaw</li> </ul>

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3. City of Surrey also has a Tenant Protection Policy that requires compliance with its Tenant Protection Bylaw as well as rental replacement requirements.

Municipality	Regulatory Tool	Implementation	Enforcement
City of Victoria	<ul style="list-style-type: none"> <li>Tenant Protection Bylaw</li> <li>Development Permit Area</li> </ul>	<ul style="list-style-type: none"> <li>Tenant Assistance Plan (TAP) prior to land use application permit (if application will result in loss of any rental units)</li> <li>TAP prior to issuance of Building Permit (including - engage a TRC, provide three alternative rental unit options, inform of ROFR)</li> <li>Provide written notice to collect expression of interest for ROFR six months (but no more than nine months) prior to applying for occupancy permit</li> <li>Contact in writing each affected tenant who expressed interest in ROFR 90 days prior to applying for occupancy permit (with tenancy agreement, details on rental unit, location, availability date + no less than 45 days to sign tenancy agreement)</li> </ul>	<ul style="list-style-type: none"> <li>Offence Act - a fine of not less than \$100 and not exceeding \$50,000</li> <li>Municipal Ticketing Bylaw (fines up to \$3,000)</li> <li>Bylaw Notice (fines up to \$500)</li> </ul>

Each of the three municipalities requires detailed information regarding tenant displacement as part of the development permit process, including submission of a **tenant protection / assistance plan**. Reporting associated with this plan must occur at several stages, such as prior to final approval of the development permit, as well as before the issuance of both the building permit and the occupancy permit.

Additionally, two of the municipalities have implemented a **DPA** for citywide tenant protections; however, the City of Surrey currently does not have such a DPA in-place. According to a recent internal memo from City staff, there is ongoing consideration of the potential advantages and disadvantages of establishing a tenant protection DPA for Surrey.

Two of three municipalities use **bylaw enforcement mechanisms** such as the Offence Act, ticketing, and bylaw notices. Kelowna instead relies on development permit guidelines, requiring a Compliance Report before a Building or Demolition Permit, with possible enforcement under the Building Bylaw; this method aims to reduce enforcement and monitoring demands.

## Scope + Eligibility

Municipalities have the authority to define the responsibilities required of property owners under tenant protection policies or bylaws, which may entail setting eligibility criteria, such as specifying a minimum number of rental units per building. Additionally, municipalities may determine the categories of housing to which these regulations apply, including primary rental units, non-market housing, and secondary rental units.

Table 4: Comparison of Scope / Eligibility by Municipality

Municipality	Unit Threshold	Housing Type	
City of Kelowna	Buildings with 5+ rental units	Primary Rental	BYLAWS
City of Victoria	Any redevelopment resulting in loss of any rental units	Any residential building	
City of Surrey	Buildings with 6+ rental units	Primary Rental	
City of Burnaby	Buildings with 5+ rental units	Primary rental and secondary rental <sup>4</sup>	POLICIES
City of Coquitlam	Buildings with 5+ rental units	Primary rental, multi-family, cooperative housing, and non-market rental	
City of Langley	Unspecified	Primary rental	
City of White Rock	Buildings with 3+ rental units	Primary rental	
City of Revelstoke	Buildings with 5+ rental units	Primary rental	
District of North Vancouver	Buildings with 5+ rental units	Primary rental, secondary rental	
District of Saanich	Buildings with 5+ rental units	Primary rental, secondary rental	

Eight out of ten municipalities examined establish a minimum unit requirement, with half specifying a threshold of **five or more rental units**. Beyond primary rental housing,

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4. In buildings with less than five rental units when consolidated into a larger redevelopment.

certain municipalities broaden their policies to encompass secondary rental units and strata properties utilized as rentals. The District of North Vancouver, for instance, includes both secondary rental and strata units that function as rental accommodations. In Revelstoke, the policy additionally incorporates manufactured homes and strata conversions.<sup>5</sup>

Among the municipalities examined with TPBs, each defines a different set of eligibility criteria. While all three apply their TPBs to redevelopment proposals, the applicable minimum number of affected rental units varies. For example, the City of Victoria does not specify a minimum threshold; its TPB applies to **any** redevelopment that results in the loss of **any** number of rental units.

## Notices or Information of Redevelopment

Municipalities may establish requirements regarding the timing and nature of information that property owners must provide to impacted tenants. Such communications generally include specifics concerning the proposed redevelopment, the current state of the property, schedules and updates on project progress, resources available for tenant assistance and support, as well as formal notifications related to termination of tenancy.

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5. Manufactured homes are not specifically included the authority for Tenant Protection Bylaws under the *Community Charter*. Strata conversions would not fit the definition of redevelopment under the TPB authority and would likely require a separate policy aligning with the *Strata Property Act*.

Table 5: Comparison of Notices of Information of Redevelopment by Municipality

Municipality	Type of Information <sup>6</sup>	Updates
City of Kelowna	Tenant communication strategy, proposed redevelopment, existing conditions, tenant assistance	None stated
City of Victoria	Existing conditions, affected tenants, tenant assistance, communication history	Every four months
City of Surrey	Proposed redevelopment, tenant assistance, progress updates	Every six months
City of Burnaby	Proposed redevelopment, tenant assistance	Required; unspecified frequency
City of Coquitlam	Proposed redevelopment, tenant assistance	Early and ongoing
City of Langley	Proposed redevelopment, existing conditions, timelines, tenant assistance	Based on owner discretion; tenant information meetings to be held until notice to end tenancy
City of White Rock	Tenant communication strategy, proposed redevelopment, existing conditions, tenant assistance, vulnerable tenant supports	Advanced notifications and updates required; unspecified frequency
City of Revelstoke	Proposed redevelopment, existing conditions, timelines, tenant assistance, referrals to third party supports	Unspecified
District of North Vancouver	Proposed redevelopment, tenant assistance, notice to vacate	Required; unspecified frequency
District of Saanich	Tenant communication strategy, tenant relocation supports, tenant relocation status report	Required; unspecified frequency

Most policies and bylaws require a **Tenant Assistance Plan** that compiles and summarizes the relevant information during the application process. These plans usually outline how communication will occur, such as through meetings, written notifications, and scheduled appointments, as well as the protections available to tenants who are

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6. Types of information listed may be required to be sent to the municipality, tenant, or both.

affected, including financial support, relocation help, and Right of First Refusal (ROFR). Tenant Assistance Plans may also be provided as a resource for those impacted tenants.

The *Provincial Policy Manual for Tenant Protection Bylaws* recommends municipalities align their timing of notice delivery with the RTA's four-month notice to end tenancy. Many of the examined municipalities explicitly state early and ongoing communication between owners and affected tenants is strongly encouraged.



## Financial Compensation

Municipalities may establish requirements for the type and amount of financial compensation provided to tenants, including payment type and disbursement timing.

Table 6: Comparison of Financial Compensation by Municipality

Municipality	Amount	Payment Type	Timing
City of Kelowna	Three months' rent	Lump sum or free rent	Three months before tenancy end
City of Victoria	Based on tenancy length	Lump sum or free rent	Unspecified
City of Surrey	Three months' rent	Lump sum or free rent or combination of both	Three months before tenancy end
City of Burnaby	Based on City of Burnaby's top-up and lump sum formulas <sup>7</sup>	Lump sum or rent top-ups in either owner-secured interim housing or tenant-secured interim housing	Lump sum to be paid upon issuance of notice to end tenancy
City of Coquitlam	Based on tenancy length	Unspecified <sup>8</sup>	Unspecified
City of Langley	Based on tenancy length	Lump sum or free rent	Paid upon issuance of notice to end tenancy
City of White Rock	Based on tenancy length	Lump sum or free rent or combination of both	To be paid before issuance of notice to end tenancy
City of Revelstoke	n/a	n/a	n/a
District of North Vancouver	Four months' rent +\$35 for each month tenant has resided in unit	Lump sum or free rent or combination of both	No later than the date an affected tenant moves out
District of Saanich	Based on tenancy length	Lump sum or free rent or combination of both	No later than the time of the notice to end tenancy

7. The City of Burnaby uses formulas to calculate rent top-ups or lump sum payments, including variables like the most recent CMHC rental market survey's median rent at move-out, tenant's monthly rent, and bedroom type. The specific formulas can be found in Burnaby's *Tenant Assistance Policy*.

8. Non-profits redeveloping new non-market rental housing are exempt and may propose financial compensation that meets Council's expectations.

More than half of the municipalities use a sliding scale to calculate compensation, most based on **length of tenancy**. The specific scales can vary, for example, Table 7 outlines the District of Saanich's thresholds for length of tenancy and corresponding required compensation amounts.

Table 7: District of Saanich Compensation Scale

Tenancy Length	Compensation Required
Up to 5 years	3 months' rent
5 – 9 years	4 months' rent
10 – 19 years	5 months' rent
20+ years	6 months' rent

The City of White Rock also applies a length of tenancy approach, with thresholds beginning at less than one year and extending to 30 or more years, with compensation increasing incrementally. Many municipalities allow flexibility in how compensation is delivered, including **lump-sum payments, free rent, or a combination**. In most cases, owners are required to provide compensation no later than the issuance of the notice to end tenancy.

## Financial and/or Moving Assistance

Municipalities may also establish forms of financial and moving assistance separate from general financial compensation.

Table 8: Comparison of Financial and/or Moving Assistance by Municipality

Municipality	Definition of Comparable Unit	Financial Support for Relocation	Relocation Support
City of Kelowna	n/a	\$1,000 lump sum payment to cover moving expenses	Voluntary relocation assistance
City of Victoria	Located within Greater Victoria, Canada Mortgage and Housing Corporation's (CMHC) average rent or less (or reasonably comp. to current rent), and tailored to tenant's needs	n/a	Must offer three alternative rental units
City of Surrey	In the same community as existing unit, rent either 10% above CMHC average or current rent, and meet tenant's needs	\$1,000 lump sum payment to cover moving expenses	Minimum three comparable units in City of Surrey
City of Burnaby	n/a	Lump sum payment of \$900 (0 to 1-bed), \$1,200 (2-bed), or \$1,400 (3+bed) to cover moving expenses <sup>9</sup>	Provision of insured moving company and packing supplies
City of Coquitlam	n/a	Lump sum payment of \$750 (0 to 1-bed) or \$1,000 (2+bed) to cover moving expenses	Must offer three alternative rental units

9. In City of Burnaby, moving assistance is provided as one of two options, an insured moving company or a lump-sum payment.

Municipality	Definition of Comparable Unit	Financial Support for Relocation	Relocation Support
City of Langley	n/a	Credit towards cost of a moving company or lump sum payment of \$900 (1-bed), \$1,200 (2-bed), or \$1,400 (3+bed) to cover moving expenses	Provide minimum three alternative units in City of Langley
City of White Rock	Located in City of White Rock or within 5-km of City's boundary, maximum rents do not exceed CMHC rent average for the area, tailored to tenant's needs	Must arrange and pay all moving costs to relocate tenants	Assist in finding three comparable units. Two must be within or 5km of City's boundary, and one must be purpose-built rental
City of Revelstoke	n/a	Unspecified amount	Must identify suitable relocation options for tenants
District of North Vancouver	Comparable price no more than 10% above current or CMHC rent	Lump sum payment of \$1,000 (0-1 bedroom), \$1,250 (2-bedrooms), or \$1,500 (3+ bedrooms) to cover moving expenses	Assist in finding three comparable units. Cannot be 10% above the tenant's current rent or 10% above the most recently published CMHC median rent level, by number of bedrooms, for Metro Vancouver
District of Saanich	Same number of bedrooms and degree of accessibility of existing unit	Choice of arrangement and payment of moving company, or lump sum compensation equal to one month's rent at Saanich Primary Rental Market average for units of same size	Relocation assistance is available and to be facilitated by the Tenant Relocation Coordinator

**Moving assistance** generally involves coordinating and fully covering the cost of moving services or providing a lump-sum payment to help offset tenant relocation expenses. **Relocation assistance** entails identifying and securing alternative housing options for affected tenants, with a standard requirement to source three comparable units.

Alternate accommodations for tenants are often defined as comparable units based on location and price, such as within city boundaries or within 10% of current or CMHC average rent. About half of municipalities specify this definition, commonly referencing the CMHC average. For example, Surrey defines a comparable unit by community location and rent within 10% of the average or current rate, considering tenant needs, while North Vancouver focuses solely on price.

## Right of First Refusal

The Right of First Refusal (ROFR) lets displaced tenants have priority to return to a unit in the redevelopment or another unit owned by the property owner. Municipalities set implementation details, including price conditions.

Table 9: Comparison of Right of First Refusal by Municipality

Municipality	Right of First Refusal
City of Kelowna	No more than 10% higher than original rent; ROFR provided under owner's discretion
City of Victoria	20% below rental rates specified in applicable zoning bylaw for corresponding dwelling unit
City of Surrey	10% below CMHC average rent
City of Burnaby	Current rent + annual RTA increases
City of Coquitlam	25% below market rental
City of Langley	20% below CMHC average rent or 15% discount off unit purchase price
City of White Rock	Below Market Rent based of length of tenancy; 20% for less than one year, capped at 30% for 10+ years
City of Revelstoke	Details unspecified
District of North Vancouver	Offers tenants the right to return without adjusted rental rates; rent to own is available with 5% discount off unit purchase price
District of Saanich	20% below starting market <sup>10</sup> rent levels

Typical ROFR provisions include discounted rents or purchase prices, often benchmarked to CMHC average rents. For example, the City of Surrey requires rents to be set at 10% below CMHC average rents, while the City of Langley offers either 20% below CMHC average rents or a 15% discount off the unit purchase price.

Of the municipalities reviewed, all but one require owners to provide ROFR. The City of Kelowna adopts a voluntary approach, leaving the provision of ROFR to the discretion

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10. The landlord may use income tests to verify the 20% discount on market rates is necessary for the rent to be affordable for the returning tenant. If the market rate for the comparable unit is less than 30% of the household's income, ROFR can be offered at market rate. If a tenant's current rent is higher than the proposed 20% below market rent level, ROFR can be offered at the tenant's current rent.

of the property owner. **Typical rent levels are between 10 to 25% below CMHC average rent.** The City of Burnaby adopts a distinct approach by setting returning tenants' rental rates at their existing rent level from the original development, adjusted only by annual RTA increases. In addition, the City provides rent top-ups to support tenants during interim housing arrangements. The District of North Vancouver offers affected tenants a ROFR but does not provide rent adjustments for returning tenants. The District also includes a rent-to-own option, allowing eligible tenants to rent a new unit with the opportunity to purchase it at the end of the rental period.

## Tenant Relocation Coordinator

Tenant Relocation Coordinators (TRCs) typically serve as intermediaries between the owner and affected tenants. Common TRC responsibilities include facilitating meetings and communications with tenants, identifying and securing alternate accommodations, maintaining ongoing relationships with affected tenants, understanding and addressing unique tenant needs, and undertaking additional duties outlined in Tenant Assistance Plans. TRCs are generally hired by owners and may be either staff (e.g., developer's own internal tenant relocation coordinator) or third-party organizations. Municipalities may also specify requirements for how TRCs are to be engaged. A key challenge is the limited availability of experienced organizations or individuals qualified to fulfill the role. Currently, there is no specific criteria (e.g., education, certification, etc.) governing the qualifications of TRCs.

Table 10: Comparison of Tenant Relocation Coordinator by Municipality

<b>Municipality</b>	<b>Tenant Relocation Coordinator Requirement + Responsibilities</b>
City of Kelowna	Voluntary and upon owner discretion to hire a TRC
City of Victoria	Yes; if 20+ rental units, owner must engage with third party TRC. Can be waived; Director of Planning's discretion
City of Surrey	Yes; must identify three comparable alternate accommodations
City of Burnaby	Yes; must identify three comparable alternate accommodations
City of Coquitlam	Yes; assist with search and securing alternate accommodations
City of Langley	Yes; assist with search and securing alternate accommodations + assistance programs
City of White Rock	Yes; must identify three comparable alternate accommodations
City of Revelstoke	n/a
District of North Vancouver	Yes; must identify three comparable alternate accommodations
District of Saanich	Yes; assist with search and securing alternate accommodations

Among the municipalities reviewed, all but two require the involvement of a TRC. The City of Kelowna identifies the use of a TRC as voluntary and at the discretion of the property owner, while the City of Revelstoke does not specify a TRC requirement. The City of Victoria requires applicants to engage a third party to fulfill the TRC role but acknowledges the limited availability of qualified providers by permitting this requirement to be waived at the discretion of the Director of Planning. In municipalities where TRCs are required, responsibilities consistently include general communication duties and securing alternate accommodations for affected tenants, ensuring units meet the applicable definition of a comparable unit.



## Considerations for the City of Nanaimo

The considerations below summarize key findings from the best practices review. When determining which tenant protection strategies best suit Nanaimo's needs, it is important to account for local housing trends, the current rental housing market, and feedback from interest-holders.

- Municipalities with tenant protection bylaws require reporting on tenant displacement as part of development permits. Most have **Tenant Protection Development Permit Areas**, citywide protections, and **bylaw enforcement** through the Offence Act, ticketing, and notices. Nanaimo could add accountability measures from demolition to occupancy, especially for tenancy terminations.
- Most municipalities set eligibility **thresholds around 5+ units** and apply tenant protection measures to **primary rental housing**. Some expand to 3+ units or all rental housing, as well as include secondary rental market and non-market housing. Nanaimo has direction to start with 4+ unit rental buildings. Other local considerations include the growing number of secondary suites and recent non-market redevelopment projects.
- Most municipalities require a **Tenant Assistance Plan** detailing redevelopment timelines and supports, usually matching the **Rental Tenancy Act's four-month notice**. Nanaimo can decide which information is most useful for internal tracking and tenants. Stricter requirements, like mandatory meetings, may need more reporting metrics and staff resources.
- Financial compensation is typically determined through a **length-of-tenancy sliding scale**, with payments delivered as **lump sums, free rent, or both**, and generally provided no later than the notice to end tenancy. Nanaimo has experienced significant rent increases, nearly doubling since 2012. The latest Census reported 3,350 renter households (24.2%) were in Core Housing Need. Residents with longer tenancies may face significant challenges re-entering the market and may benefit from a sliding-scale approach and potential income testing to support those in Core Housing Need.
- Municipalities typically mandate that property owners furnish **moving services or lump-sum payments** and identify **at least three comparable units** to assist tenants in securing alternative accommodation. In certain jurisdictions, owners may select

between providing a lump-sum moving payment or arranging relocation services directly. As much of the new development in Nanaimo consists of one- and two-bedroom units accompanied by notable rent increases, compromises regarding comparable units, such as greater distance from the current location or variations in unit size, may be necessary. Engaging with interest-holders can yield valuable perspectives on suitable trade-offs when determining comparable units.

- Nearly all municipalities require a **Right of First Refusal**, commonly offering **10 to 25% below-market rents** and using CMHC's average rents as a benchmark. Due to increasing rents in Nanaimo, discounted market rents may still be unattainable for current tenants. The City may want to consider a more aggressive approach by honouring current rents or a capped percent increase on current rents; this approach may impact project viability and would require further considerations to offset costs.
- Most municipalities **require the appointment of a Tenant Relocation Coordinator** (TRC) to facilitate communication with tenants and arrange for alternative accommodations. In certain jurisdictions, the requirement applies solely to larger properties, such as those containing 20 or more units, while others stipulate that the TRC must be an independent third party. Nanaimo may wish to implement clear criteria to verify the qualifications of TRCs, while retaining flexibility for the City to waive these requirements in exceptional circumstances.

