

File: 6500-30

March 13, 2025

Sent via email only: [jschile@courtenay.ca](mailto:jschile@courtenay.ca)

Jamai Schile  
Manager of Development Services  
City of Courtenay  
830 Cliffe Avenue  
Courtenay, BC V9N 2J7

Dear Jamai Schile:

**Re: Development Permit Area Amendments for Small-Scale Multi-Unit Housing**

Thank you for the opportunity to comment on the proposed amendments to the City's Official Community Plan (OCP). These amendments would update the form and character Development Permit Areas (DPA-1 and DPA-2) to provide greater flexibility and support small-scale multi-unit housing (SSMUH).

DPA-1, which applies to larger-scale multi-unit residential developments, would see its threshold raised from "three or more" to "five or more" dwelling units. DPA-2, which has fewer guidelines, would apply to developments with "three or more" units, excluding duplexes and accessory dwelling units. These changes would streamline the approval process for three- to four-unit developments and remove form and character DPA requirements for two-unit developments, facilitating faster construction.

The amendments align with several Comox Valley Regional Growth Strategy (RGS) policies, including:

- 1A-2: Concentrating higher-density developments in existing municipal areas
- 1A-5: Revising OCP policies that unnecessarily restrict infill and redevelopment
- 1A-6: Expanding housing opportunities through multi-family conversions, secondary suites, and small-lot infill
- 1B-2: Supporting multi-unit developments that contribute to affordable housing
- 1C-1: Promoting a mix of low (40 per cent), medium (30 per cent), and high (30 per cent) density housing, with the proposed amendment facilitating more medium density housing

- 1C-4 & 1C-5: Encouraging infill units, secondary suites, and multi-family housing near transit and infrastructure
- 1D-1: Directing new housing to areas with public water and sewer services
- 5A-1, 5D-1 & 5A-3: Focusing growth in Core Settlement Areas and promoting higher-density development for efficient infrastructure use

These amendments also support key growth management policies, such as:

- MG Policy 1.2: Ensuring at least 90 per cent of growth occurs in Core Settlement Areas to optimize land use and public infrastructure
- MG Policy 1B-1: Accommodating growth through intensification and infrastructure improvements, including transit and active transportation

According to the City's Housing Needs Report (August 2024), approximately 8,350 new units will be required by 2041, with 2,472 needed by 2026. Simplifying DPA requirements for three- to four-unit developments and removing them for two-unit developments will help increase housing supply to meet this demand.

These amendments are consistent with RGS policies on housing, provided they are supported by public infrastructure, including community water, sewer, and transit. They also align with the City's identified housing needs.

For any questions, please contact Brian Chow, Planner II – Long Range, at [bchow@comoxvalleyrd.ca](mailto:bchow@comoxvalleyrd.ca) or 250-334-6017. Thank you.

Sincerely,

*R. Holme*

Robyn Holme, MCIP, RPP  
Manager of Long Range Planning and Sustainability

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