



The Corporation of the City of Courtenay

# Staff Report

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**To:** Council

**File No.:** 3010-01

**From:** Acting Director of Development Services

**Date:** February 11, 2026

**Subject:** Comox Valley Regional Growth Strategy minor amendment – referral response

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**PURPOSE:** To provide referral response to Bylaw No. 810, Comox Valley Regional District Regional Growth Strategy Bylaw No. 120, 2010, Amendment No. 2.

## **BACKGROUND:**

On December 9, 2025 the Comox Valley Regional District (CVRD) Board gave first and second reading to Bylaw No. 810, Comox Valley Regional District Regional Growth Strategy (RGS) Bylaw No. 120, 2010, Amendment No. 2. The City of Courtenay received an invitation to provide referral comment on December 18, 2025. Comments may be received up until the end of the public hearing scheduled for the RGS Amendment Bylaw which is scheduled for February 17, 2026, starting at 6 pm.

Prior to this official invitation for referral comment, the City received a statutory 30-day written notice to advise the City of the date, time, and location of the Board's intention to give the bylaw first reading. At the November 19, 2025 regular Council meeting, Council passed the following resolutions as relates to the bylaw:

THAT Council receive the information presented regarding the Comox Valley Regional District's Regional Growth Strategy Amendment Bylaw No. 810; and,

THAT Council advise the Comox Valley Regional District that the City will not be requesting an extension to the deadline for comment.

Further, Council passed the following resolution at the November 19, 2025 regular Council meeting to support

THAT Council request the Comox Valley Regional District (CVRD) initiate a collaborative review of its referral procedures to enhance collaboration, address barriers to engagement and streamline input processes.

City staff, primarily led by Development Services, is a regular participant in the regional planning Technical Advisory Committee (TAC), and participated in the scoping of the RGS amendment in 2022 and in TAC meetings at key RGS amendment bylaw review milestones. Regional local government City Managers participate in the steering committee of the RGS amendment as required.

## **DISCUSSION:**

City staff have participated in the initial scoping of the RGS amendment exercise, have been involved at key discussion points with CVRD staff, and have reviewed the RGS Amendment Bylaw No. 810. Staff evaluate the proposed amendments as fulfilling the criteria of the intended minor amendment that does not change the growth framework, vision, goals, or policies of the RGS. Staff confirm that its purpose is to update Census information, integrate the Board's Indigenous Relations strategic driver, remove obsolete references, and revise mapping to reflect municipal boundary changes. The RGS continues to provide clear direction on growth sequencing, servicing, and coordinated infrastructure investment, aligning closely with municipal

objectives for fiscal sustainability, environmental stewardship, and complete, well-serviced communities. Staff do not recommend any referral comments be directed at the substance of the amendments.

The key points of the letter relate to the *implementation* of the RGS, summarized here:

### **1. Upholding the RGS Growth Management Framework**

- Reaffirm continued support for RGS policies that direct approximately 90% of growth to Core Settlement Areas and strictly manage the location, timing, and servicing of growth elsewhere.
- Reinforce that Rural Lands and Settlement Expansion Areas (SEAs) are intentionally designated as self-supporting and not intended for subdivision or urban servicing prior to coordinated municipal boundary extensions.
- Emphasize the importance of compact growth in limiting sprawl, protecting rural and natural lands, and optimizing public infrastructure investment.

### **2. Implications of SSMUH Legislation on Regional Growth Management**

- Acknowledge that SSMUH legislation (Bill 44) introduces minimum density requirements that may conflict with the RGS when public water and sanitary services are extended beyond Core Settlement Areas.
- Identify the risk that planned regional servicing projects—particularly in south Courtenay—could unintentionally prematurely enable higher densities in areas not yet intended for growth under the RGS.
- Highlight the need to rigorously uphold RGS servicing policies to preserve the integrity, effectiveness, and long-term sustainability of the regional growth framework.

### **3. Maintaining Minimum Self-Supporting Lot Sizes**

- Support retention of RGS-prescribed minimum parcel sizes in rural settlement areas (4–20 ha) and Settlement Expansion Areas (4 ha).
- Note that CVRD zoning amendments enabling subdivision under Local Government Act Section 514, combined with SSMUH legislation, now allow increased densities without the ability to restrict them via covenant.
- Raise concern that continued subdivision below RGS minimums erodes the intent to focus growth within Core Settlement Areas, undermines coordinated planning, and identifies strong City support for adherence to the minimum parcel sizes established in the RGS.

### **4. Protecting Orderly Growth in Settlement Expansion Areas**

- Reiterate that subdivision within Settlement Expansion Areas should not occur prior to municipal boundary extension and adoption of a Local Area Plan, as directed by the RGS.
- Emphasize that premature subdivision compromises orderly growth, infrastructure planning, asset management, fiscal planning, and meaningful community engagement.

### **5. Regionally Informed Municipal Boundary Extensions**

- Reaffirm Courtenay’s growth management policy of focusing growth within existing municipal boundaries.
- Support boundary extensions only where justified by projected growth and land use needs and coordinated through regional processes.

- Encourage proactive, regionally informed discussions on future boundary extensions, including use of the regional Technical Advisory Committee (TAC).

#### **6. Regional Employment Lands Assessment**

- Support undertaking a region-wide assessment of employment lands availability and future needs, recognizing that employment markets and industrial land demand extend beyond municipal boundaries.
- Request that this assessment be included as part of the next RGS review milestone scheduled for 2027, consistent with RGS Section 5.1.6.

#### **7. Regional Housing Planning and Coordination**

- Express support for CVRD's establishment of the Comox Valley Housing Authority and its focus on non-market rental housing.
- Note Courtenay's intent to develop a below- and non-market housing strategy in 2026, aligned with regional initiatives and partners including CVRD, BC Housing, and the non-profit sector.
- Welcome reconvening with CVRD staff on the Regional Housing Action Plan and Homelessness Plan to enhance coordination, information sharing, and alignment across jurisdictions.

#### **8. Strengthening RGS Implementation and Regional Collaboration**

- Support co-development of RGS implementation agreements across key areas, including growth management, infrastructure and service delivery, First Nations collaboration, transportation, climate action, ecosystems, and public health and safety.
- Endorse coordinated monitoring, shared data standards (e.g., population projections), and regular five-year RGS reviews.
- Support regular, standing TAC meetings with appropriate subject-matter experts to advance coordinated implementation.

#### **9. Referral Process Review**

- Reiterate Council's request for a collaborative review of CVRD referral procedures to improve coordination, reduce barriers to engagement, and streamline input processes.
- Emphasize the importance of effective referral processes given high regional growth projections and increasing demands on regional water and sewer services.

#### **10. Regional Advocacy and Federal Coordination**

- Identify emerging pressures related to Department of National Defence expansion and associated impacts on housing demand, infrastructure, and community services.
- Express interest in coordinating a regional advocacy approach with federal representatives to address housing and infrastructure impacts and explore opportunities for collaborative planning and service delivery.

The attached draft referral response letter provided for Council's consideration outlines the detail of these implementation opportunities (Attachment No. 1).

The key points above illustrate a number of areas the City could work together with the CVRD, member municipalities and other partners on in pursuit of continuing to strengthen the *implementation* of this important growth framework. Without a concerted effort to work collaboratively on the points raised in the letter and discussed above, staff identify an emerging concern of ensuring that the continued implementation of the RGS—particularly in the context of new provincial housing legislation and major

regional servicing initiatives—remains consistent with its original intent and policy direction: to provide a strong, effective, and well-established framework that successfully guides community growth to Core Settlement Areas, supports compact and efficient development, and protects rural, working, and natural lands from premature urbanization.

The letter includes request for additional detail on the following matters raised:

- That the City of Courtenay to be advised of the outcomes of the August 11, 2025 CVRD motion: “THAT staff bring back a report that includes mapping of the past Local Government Act section 514 applications, and data regarding the number and location of properties that have recently been built with second dwellings”, as decisions within the Settlement Expansion Areas in particular implicate future municipal boundary extensions.
- That the City of Courtenay to be advised of whether the regional employment lands assessment is intended to be included in the next RGS review scope of work, as the City would await commissioning Courtenay-specific employment studies in support of a regional approach to this topic.

**POLICY ANALYSIS:**

Minor amendment procedures for a Regional Growth Strategy (RGS) are outlined in Local Government Act (LGA) Section 437. This section allows the RGS to specify criteria for determining minor amendments, ways to gather and consider input from affected local governments, notice provisions, and adoption procedures.

**FINANCIAL IMPLICATIONS:**

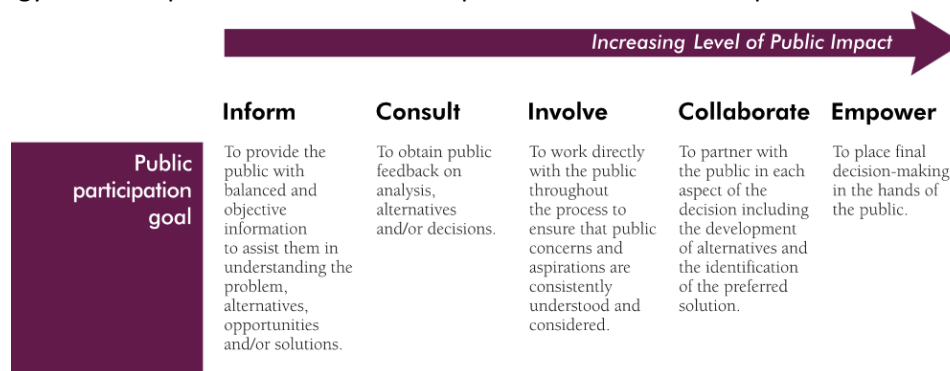
There are no direct financial implications related to submitting a referral response. However, a number of the items identified in the draft referral letter

**ADMINISTRATIVE IMPLICATIONS:**

City staff will continue to participate in the regional Technical Advisory Committee.

**PUBLIC ENGAGEMENT:**

As this is a referral from the CVRD, Courtenay residents are informed of the City’s perspective on the Regional Growth Strategy via this report based on the IAP2 Spectrum of Public Participation:



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**OPTIONS:**

1. THAT Council approve the City of Courtenay’s referral response to the Comox Valley Regional District Regional Growth Strategy minor amendment (RGS Amendment Bylaw No. 810) (Attachment 1); and,

THAT staff be directed to submit the City's response to the CVRD before February 17, 2026.

2. THAT Council provide alternative direction to staff.

**ATTACHMENTS:**

1. Draft City of Courtenay RGS Amendment Bylaw No. 810 Referral Response
2. Letter from CVRD Chair re: CV RGS Minor Amendment Bylaw Referral

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