

February 13, 2026

File No. 3010-01

Comox Valley Regional District
770 Harmston Avenue
Courtenay, B.C.
V9N 0G8

Sent via email only:
amullaly@comoxvalleyrd.ca

Dear Chair Cole-Hamilton,

RE: Comox Valley Regional Growth Strategy Minor Amendment Bylaw Referral

Thank you for the opportunity to provide comment on the Comox Valley Regional Growth Strategy Amendment Bylaw No. 810. Please find enclosed comments from City of Courtenay as passed by Council resolution at the February 11, 2026, regular City of Courtenay Council meeting.

The City of Courtenay recognizes the role of City staff, primarily led by Development Services, in participating in the regional planning Technical Advisory Committee (TAC) who participated in the scoping of the RGS amendment in 2022 and in TAC meetings at key RGS amendment bylaw review milestones. The City of Courtenay also recognizes the role of the regional local government City Managers in participating in the steering committee of the RGS amendment.

The City of Courtenay recognizes CV RGS Amendment Bylaw No. 810 as a minor amendment that does not change the growth framework, vision, goals, or policies of the RGS and 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 City recognizes the RGS as a growth management policy framework in pursuit of the RGS vision:

The Comox Valley will continue to evolve as a region of distinct, well-connected and well-designed urban and rural communities. As stewards of the environment, local governments, the K'ómoks First Nation, public agencies, residents, businesses and community and non-governmental organizations will work collaboratively to conserve and enhance land, water and energy resources and ensure a vibrant local economy and productive working landscapes.

The City of Courtenay continues to support this vision and the RGS policy framework, including RGS Amendment Bylaw No. 810. The RGS is a strong, effective, and well-established framework that has successfully guided community growth to Core Settlement Areas, supported compact and efficient development, and protected rural, working, and natural lands from premature urbanization. The City is supportive of the RGS's clear direction on growth sequencing, servicing,

and coordinated infrastructure investment, which aligns closely with municipal objectives for fiscal sustainability, environmental stewardship, and complete, well-serviced communities.

The City looks forward to continuing to strengthen the *implementation* of this important document and vision and requests that the following comments be considered in support of implementation of the RGS:

1. Land use planning and housing:

- a. **Continued support for implementation of RGS policies related to servicing within Settlement Expansion Areas.** The RGS (including as amended) establishes a clear and comprehensive growth management framework that intentionally directs approximately 90% of regional growth to Core Settlement Areas, of which the three municipalities represent the most significant. This framework carefully governs both the location and sequencing of growth, as well as the provision of servicing outside these areas. Rural lands and Settlement Expansion Areas (SEAs) are explicitly identified as unsuitable for subdivision and urban servicing, precisely to ensure they remain self-supporting through private water and/or septic systems, and to avoid the premature or uncoordinated extension of public infrastructure. In the case of SEAs, servicing is deliberately deferred until such time as a municipal boundary extension occurs. This growth strategy is firmly articulated through the Section 4.4 Growth Management Principles and the associated land use designation policies, which are intended to “promote the efficient use of land and public infrastructure, provide densities supportive of alternative transportation choices, and achieve environmental benefits resulting from compact growth. Additionally, directing growth to Core Settlement Areas will limit sprawl and curtail urban encroachment into Rural Areas, working landscapes and natural areas” (Managing Growth Policy 1.2).

Since adoption of the RGS, Small-scale Multi-unit Housing (SSMUH) legislation (Bill 44, 2023) has introduced minimum density zoning requirements for local governments, including regional districts. While lands not serviced by both public water and sanitary services are generally exempt from minimum densities beyond two dwelling units per parcel, the introduction of such services would materially alter this regulatory context. Specifically, electoral area lands not intended for growth under the RGS would become eligible for minimum densities of between three and six units per parcel, subject to additional legislative criteria. This shift has significant implications for the integrity of the RGS growth management framework.

With major regional sanitary and water servicing projects currently being advanced—particularly in the southern Courtenay area—there is a tangible risk that lands outside Core Settlement Areas could inadvertently become eligible for higher residential densities. Such an outcome would directly conflict with the deliberate and coordinated

growth strategy established by the RGS, effectively undermining the region's long-standing vision, values, and approach to sustainably accommodating growth.

Importantly, the RGS provides a clear and appropriate mechanism for addressing coordinated regional growth through its Part 5 Implementation and Monitoring provisions, which the City continues to strongly support, as discussed further in bullet 2.a. below. Recent provincial legislation further underscores the necessity of rigorously upholding RGS servicing policies in areas not intended for growth, or in areas intended to transition only through coordinated municipal boundary extensions. Adherence to these policies is essential to maintaining the effectiveness, credibility, and long-term sustainability of the regional growth management framework.

- b. **Support for maintenance of minimum self-supporting lot sizes in rural settlement areas (4-20 ha) and Settlement Expansion Areas (4 ha).** The City is aware of amendments to the Electoral Area OCP and Zoning Bylaw that permit subdivision below the minimum parcel sizes prescribed in the RGS Bylaw, specifically in relation to Local Government Act Section 514 (“subdivision to provide a residence for a relative”). Historically, such subdivisions were accompanied by restrictive covenants limiting density to a single dwelling unit in order to preserve the intent and effectiveness of the RGS. However, the introduction of SSMUH legislation now prohibits the use of such covenants and instead requires a minimum of two dwelling units per parcel, with minimum densities increasing to between three and six units where sanitary and water services are available.

As a result, any further subdivisions approved under Section 514 would inherently enable increased residential densities, thereby eroding the RGS objective of directing growth to Core Settlement Areas. Moreover, permitting subdivision within Settlement Expansion Areas in advance of an adopted Local Area Plan—a RGS requirement related to municipal boundary extension—undermines the ability to achieve coordinated, orderly growth. This approach compromises effective servicing, asset management, fiscal planning, and meaningful community consultation within an appropriate municipal governance framework.

As follow up to a CVRD staff report on options to address the implementation of LGA Section 514 in light of Bill 44 implications, the City understands that the CVRD Board has directed staff to bring back a report of the past LGA Section 514 applications. As outlined above, the City continues to strongly support adherence to the minimum parcel sizes established in the RGS, as well as the overarching RGS principles that prioritize the concentration of growth, including through subdivision, within designated Core Settlement Areas (municipal areas and settlement nodes).

As decisions for subdivision particularly within the Settlement Expansion Areas implicate future municipal boundary extensions, the City requests 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”

- c. **Support for regionally informed boundary extensions.** Courtenay OCP growth management policy is to focus growth within existing municipal boundaries and to consider boundary extensions commensurate with projected growth and land use needs. In support of RGS policy MG (Managing Growth) 1E-1, the City would welcome proactive regional discussions about future boundary extensions such as the use of regional TAC for these purposes.
- d. **Support for regional employment lands assessment.** The topic of regional assessment of employment lands availability and needs has been discussed through the TAC, recognizing that many employment industries, including industrial lands, plan and operate beyond individual municipal boundaries. In support of RGS Section 5.1.6 (Undertake related studies of projects), the City requests that regional employment lands assessment occur as part of the next RGS review milestone, which is scheduled for 2027.

As the City understands this is an intention of the next RGS review scope of work, and would await commissioning Courtenay-specific employment studies in support of a regional approach to this topic, the City requests to be advised of whether this study is intended to be included in the next RGS review scope of work.

- e. **Support for regional housing planning.** The City applauds the significant efforts of the CVRD to establish a Comox Valley Housing Authority focused on non-market rental housing. The City of Courtenay will be developing a below- and non-market housing strategy in 2026 that identifies an appropriate role for the City in supporting below- and non-market housing in relation to other services and strategies within this sector including but not limited to: the Comox Valley Housing Authority, Comox Valley Regional Housing Action Plan, non-profit housing sector and BC Housing.

The City welcomes opportunity to reconvene with CVRD staff on the Regional Housing Action Plan and Homelessness Plan to support awareness, ideas sharing and coordination of local government approaches to the diverse forms of affordable housing needed in our individual and regional communities.

2. Working together on RGS implementation:

- a. **Support for co-development of implementation agreements identified within the RGS.** The RGS recognizes that more detailed implementation strategies are required to effectively utilize the policies contained within the RGS. The City supports collaborative and co-development of these implementation agreements on all topics listed: regional

growth management and service delivery, on government-to-government First Nation growth management, working regionally with Ministry of Transportation and Transit, on action plans to guide specific goals and policy themes within the RGS (e.g. climate action, ecosystems, natural areas and parks, public health and safety, food systems), and on creating coordinated monitoring and evaluation programs, five-year RGS reviews and undertaking additional studies and projects, as needed.

An example of coordination includes regular coordination of regional infrastructure planning and use of common data standards such as population projection methodologies when reviewing new Development Cost Charge (DCC) and Amenity Cost Charge (ACC) proposals. One such venue to develop the implementation agreements is the staff TAC, which the City supports regular standing TAC meetings to advance these topics, and include the subject expert departments as required in addition to planning staff of respective jurisdictions.

- b. **Request for referral review:** At the November 19, 2025 regular Council meeting, Council passed a motion to request the CVRD initiate a collaborative review of its referral procedures to enhance collaboration, address barriers to engagement and streamline input processes. This request is in recognition and support of key Implementation and Monitoring context and policies identified within the RGS (Part 5). Specifically, with high regional growth projections and demands for increased water and sewer servicing capacity within a regional service model, among other regional coordination needs, this request would support enhancing the current referral and regional collaboration process to support more effective coordination between the City and CVRD (and member municipalities where relevant and interested). More information on the background and rationale for this request is available as [item 5.1.2 to the November 19, 2025 Council Agenda](#).

3. Regional advocacy:

- a. The City of Courtenay is monitoring the Department of National Defense expansion plans and how that growth may put pressure on existing housing demand, infrastructure, amenity and other servicing needs. City interested in coordinating a regional response to federal representatives identifying concerns with pressure on housing and the plan to provide regional and municipal infrastructure services for water and sewer, and opportunities for collaboration with them to prepare for these new residents.

The City of Courtenay would like to take this opportunity to also recognize the support and collaborative effort of CVRD staff in working with City staff on the City's upcoming OCP update and the requirement to include an updated Regional Context Statement to ensure Courtenay's OCP continues to support and implement the RGS.

On behalf of the City of Courtenay, I look forward to continuing to advance the RGS vision through the ideas advanced above. Please let me know if you have any questions.

Sincerely,

Mayor Bob Wells
City of Courtenay