

Appendix A - Regional Context Statement

The *Local Government Act* requires OCPs to include regional context statements where a regional growth strategy applies to a municipality with an OCP. Regional context statement requirements are also identified in the *Local Government Act*, and the regional context statement must identify how the OCP is consistent with the regional growth strategy or will be made consistent over time. The OCP is considered to be consistent with the RGS.

The RGS Vision is a comprehensive statement on the future of the region and the RGS Goals identify how the Vision will be achieved. The Comox OCP includes objectives, policies, and actions that align with the RGS Goals as identified in Table 1.

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.



Table 1 - RGS Goals

RGS Goal	OCP Reference	Comox OCP Supporting Objectives/Policies/Actions
<p>Housing: Ensure a diversity of housing options to meet evolving demographics and needs.</p>	<p>Section 1 – Housing Needs</p>	<ul style="list-style-type: none"> • This section identifies the Town’s 5- and 20-year housing needs and how the land use designations of the OCP can accommodate housing needs. • Policies in Section 1 aim to facilitate housing diversity to meet evolving demographics and focus on under-represented housing forms in Comox, such as: <ul style="list-style-type: none"> ○ Market and non-market rental, including consideration of rental protection, replacement, and tenant protection bylaws and policies. ○ Subsidized, supportive, co-op, special needs, and supportive housing forms. • Section 1 includes actions the Town intends to take to achieve the objectives of Section 1 by adopting and amending bylaws, policies and practices.
	<p>Part 4 – Growth and Land Use Policies OCP Future Land Use map</p>	<ul style="list-style-type: none"> • Three residential and two mixed-use land use designations provide for a diversity of housing options within the Town’s Urban Containment Boundary, from single-detached houses to mid-rise buildings.
<p>Ecosystems, Natural Areas, and Parks: Protect, steward and enhance the natural environment and ecological connections and systems.</p>	<p>Guiding Principle 6</p>	<p><i>Protect, restore and enhance the natural environment and urban forest.</i></p>
	<p>Guiding Principle 7</p>	<p><i>Provide a connected and diverse network of parks, trails, and open spaces.</i></p>
	<p>Guiding Principle 8</p>	<p><i>Enhance the Urban Forest and contribute to achieving emissions targets and risk management objectives of the Climate Action Plan and Risk Assessment.</i></p>
	<p>Section 4 – Parks, Trails and Open Space</p>	<ul style="list-style-type: none"> • Section 4 includes objectives and policies to maintain a variety of park types including passive parks, integrate green infrastructure in parks, and enhance the urban forest on Town lands. These initiatives will enhance the natural environment and ecological connections and systems in Comox, which connect to broader ecological networks in the region.



RGS Goal	OCP Reference	Comox OCP Supporting Objectives/Policies/Actions
<p>Ecosystems, Natural Areas, and Parks: Protect, steward and enhance the natural environment and ecological connections and systems.</p>	<p>Section 7 – Environment and Climate Change</p>	<ul style="list-style-type: none"> Section 7 includes objectives, policies, and actions aimed at fulfilling Guiding Principles 6 and 8. It includes partnership policies to collaborate with K’omoks First Nation, local governments including CVRD, and other interest holders in the Comox Valley to work towards this RGS Goal and OCP Guiding Principles.
	<p>Sensitive Ecosystems DPA</p>	<ul style="list-style-type: none"> The objectives of this Development Permit Area are aligned with this RGS goal. Specific objectives include: <ul style="list-style-type: none"> Protecting, restoring and enhancing environmentally sensitive areas as functioning ecosystems. Protecting biodiversity, as well as wildlife habitats, features and functions. Avoiding negative impacts to environmentally sensitive areas over mitigation or compensation. Managing the introduction and spread of invasive species. This DPA applies to known sensitive ecosystems and natural areas that may contain sensitive ecosystems. It aims to ensure that all relevant federal and provincial legislation is followed in relation to development proposals on parcels containing known or potential sensitive ecosystems. It also aims to go beyond senior government environmental protection legislation in some cases.
	<p>Riparian Ecosystems DPA</p>	<ul style="list-style-type: none"> This DPA is focused on protecting and enhancing riparian areas in the Town. Though this DPA primarily implements the <i>Riparian Areas Protection Act</i> and <i>Riparian Areas Protection Regulation</i>, it exceeds minimum standards for development with higher potential impacts, including the construction of 5 or more dwelling units on a parcel, commercial and industrial buildings, and subdivision to create three or more new parcels.



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<p>Economic Development: Achieve a sustainable, resilient and dynamic local economy that supports businesses and the region’s entrepreneurial spirit.</p>	Guiding Principle 3	<i>Enhance Downtown Comox in partnership with Comox Business in Action (BIA) and other interested community partners.</i>
	Guiding Principle 9	<i>Enhance employment and economic development for the Town of Comox.</i>
	Section 3 – Economic Development	<ul style="list-style-type: none"> Section 3 includes objectives and policies that can contribute to achieving this RGS goal, with focuses on vitalizing and enhancing the Downtown Centre, facilitating industrial/business park development, supporting the tourism sector, and working with the BIA, regional partners, and major employers in Comox. Section 3 references the Town’s Economic Development Strategy (2024) and Downtown Enhancement Action Plan (2024) and includes policies and actions to implement the strategies outlined therein.
<p>Transportation: Develop an accessible, efficient and affordable multi-modal transportation network that connects Core Settlement Areas and designated Town Centres, and links the Comox Valley to neighbouring communities and regions.</p>	Guiding Principle 1	<i>Prioritize integrated community planning, and neighbourhood nodes, with strong links between land use, infrastructure, active transportation, and community amenities.</i>
	Guiding Principle 2	<i>Plan Comox to be a complete community with convenient access to services and amenities linked by multi-modal transportation options for all abilities.</i>
	Guiding Principle 5	<i>Expand and enhance partnerships with agencies, organizations, and regional partners.</i>
	Guiding Principle 7	<i>Provide a connected and diverse network of parks, trails, and open spaces.</i>
	Section 2 – Transportation	The Transportation objectives, policies, and actions align with the RGS by focusing on improvements to active and public transportation networks while acknowledging the importance of maintaining a safe and efficient vehicular transportation network.



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<p>Transportation: Develop an accessible, efficient and affordable multi-modal transportation network that connects Core Settlement Areas and designated Town Centres, and links the Comox Valley to neighbouring communities and regions.</p>	Policy 2.10	This policy is focused on working with community partners, including the CVRD, to ensure that active transportation networks are well-integrated.
	Policy 2.32	This policy is focused on working with the CVRD and BC Transit to identify land requirements for future transit stops so that this land can be secured on development site frontages where applicable.
	Policy 2.33	This policy aims to facilitate collaboration with CVRD and BC Transit to implement the Transit Future Plan as it relates to the Town of Comox.
	Policy 2.34	This policy focuses on advocating for regional incentives for the use of public transit in the Comox Valley to reduce parking demands, which could help reduce barriers to development of the Downtown Centre in the long-term.
<p>Infrastructure: Provide affordable, effective and efficient services and infrastructure that conserves land, water and energy resources.</p>	Guiding Principle 1	<i>Prioritize integrated community planning, and neighbourhood nodes, with strong links between land use, infrastructure, active transportation, and community amenities.</i>
	Section 5 - Infrastructure	This section includes objectives, policies, and actions that focus on improving infrastructure in Comox to effectively and efficiently accommodate growth while ensuring that “growth pays for growth”. There are also objectives and policies to focus on conservation of natural resources. Recognizing the infrastructure linkages of local governments in the region, partnerships are also integrated into Section 5.
	Section 8 – Future Growth Concept	An Urban Containment Boundary has been added to the OCP. This serves as a boundary beyond which significant servicing improvements will not be considered.



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<p>Food Systems: Support and enhance the agricultural and aquaculture sectors and increase local food security.</p>	Policy 3.8	This policy supports the continuation of a Comox Valley Farmer’s Market location in Comox to support local food security, agriculture, and community gathering.
	Policies 18.1 and 18.2	These Agricultural land use designation policies ensure that lands designated Agricultural in the ALR remain in the ALR, and subdivision does not reduce parcel sizes in a manner that would negatively impact agricultural viability, except where there is a significant lack of future agricultural viability, and exclusion or subdivision is accompanied by significant benefits to the community..
	Policy 22.8	This general land use policy requires non-agricultural parcels that are developing adjacent to the Agricultural Land Reserve to incorporate appropriate buffers, setbacks and site planning consistent with the BC Ministry of Agriculture Guide to Edge Planning to limit any negative impacts of development on agricultural operations.
	Sensitive Ecosystems DPA and Riparian Ecosystems DPA	These Development Permit Areas are intended to maintain sensitive ecosystems, including the elimination or mitigation of negative impacts to marine ecosystems and the fresh water that enters them. This can help conserve aquacultural potential in the Comox Valley.
	Northeast Comox DPA	Two key goals of this DPA are to (1) reduce risks of flooding ALR lands in the CVRD east of Northeast Comox, and (2) to ensure that rainwater is managed within Northeast Comox to maintain the aquifer that ALR lands rely on for agricultural operations.



RGS Goal	OCP Reference	Comox OCP Supporting Objectives/Policies/Actions
<p>Public Health and Safety: Support a high quality of life through the protection and enhancement of community health, safety and well-being.</p>	Guiding Principle 2	<p><i>Plan Comox to be a complete community with convenient access to services and amenities linked by multi-modal transportation options for all abilities.</i></p> <p>This Guiding Principle can improve public health outcomes by making it more convenient to use active transportation to access daily needs.</p>
	Section 6 – Community Connection and Wellness	<p>Section 6 includes policies to enhance community health, safety and well-being by focusing on providing new services and scaling up existing services in step with growth, improving accessibility, and working with community partners to maintain or expand programming and events. There is also an action to work with K’omoks First Nation to identify areas that could incorporate their history, language and culture in public spaces.</p>
	Section 2 – Transportation	<p>The Transportation objectives, policies, and actions include focus on improving the active transportation network and public transportation service to make it easier and safer to travel without a vehicle, creating the conditions to improve public health outcomes.</p>
	Section 7 – Environment and Climate Change	<p>Policies in this section that focus on protection and enhancement of the urban forest and sensitive ecosystems, and climate change mitigation, can contribute to a healthier urban environment by reducing urban heat island conditions, carbon sequestration, and potentially improving well-being through biophilic effects.</p>
	Policy 4.25	<p>This policy requires the maintenance of existing matures trees as buffers on potential development parcels fronting Pritchard Road between Guthrie and Knight Road. These buffers are intended to enhance public health and well-being by reducing noise and pollution for future residents living adjacent to this arterial road and truck route.</p>



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	Temporary Use Permits (p. 81)	The OCP requires impact mitigation strategies for Temporary Use Permit applications, which can include uses that may impact the health and well-being of surrounding residents (e.g. truck and trailer parking).
Climate Change: Minimize regional greenhouse gas emissions and plan for adaptation.	Section 7 – Environment and Climate Change	This section includes objectives, policies, and actions that focus on minimizing greenhouse gas emissions and planning for adaptation, including through collaboration with regional partners.
	Action 7.18	<p>The RGS includes Greenhouse Gas Emissions targets that aligned with provincial targets at the time of RGS adoption, which have since been updated by the province.</p> <p>The Town’s 2024 Climate Action Plan and Risk Assessment includes GHG emissions reduction targets that align with current provincial emissions reduction targets. OCP Action 7.18 is a commitment to continue tracking progress towards these GHG emissions reduction targets. Transportation and land use policies are focused on targeting growth to walkable areas to reduce reliance on passenger vehicles.</p>
	Objective 4 (C.)	This policy is within the Parks, Trails, and Open Space section, and identifies the intention to consider strategically locating future park lands in locations that can increase community resilience to climate change (e.g. lands with hazardous condition risks such as flooding).



RGS Growth Management Principles

Part 4 of the RGS addresses Growth Management, including 16 growth management principles that are supported in the Comox OCP where applicable, primarily in Section 8 – Future Growth Concept. These reinforce the RGS Goals identified Table 1 above, which are identified in Part 3 – Regional Policies, of the RGS.

The RGS requires OCPs to identify areas of existing development on the fringes of municipal areas that should eventually be incorporated through boundary extensions and provided with publicly owned water and sewer services to address existing public health and environmental issues. There are no known existing public health or environmental issues on the fringe of Town of Comox that meet these criteria.

The RGS allows member municipalities to identify fringe areas that could eventually be incorporated through boundary expansions and provided with publicly owned water and sewer services to allow for new long-term growth opportunities in a phased and orderly manner that does not detract from compact growth options within existing boundaries. The Comox OCP can likely accommodate growth needs without expanding Town boundaries. However, some factors that are out of the Town’s control may impact the pace of new development, warranting consideration of boundary expansions to provide greenfield development areas as identified on *Figure 7 - OCP Growth Areas* within the next ten to twenty years. Section 8 – Future Growth Concept, includes objectives and policies to guide boundary extensions in compliance with the RGS if they are considered within the life of the OCP, consistent with RGS MG Policies 1E-1 to 1E-5.

RGS MG Policy 1.2 is that a minimum of 90 % of growth within the Comox Valley will be directed to *Core Settlement Areas*. The Town of Comox is a *Core Settlement Area* and primary location for accommodating growth. This OCP aims to increase the pace of growth and accommodate most growth within the Urban Containment Boundary. Land use designations in the OCP on lands that are likely to redevelopment can accommodate approximately 7,760 new units, which exceeds 20-year housing need of 3,358 units. As a result, the land use designations within the OCP can support more than the Town’s share of projected regional growth.

RGS MG Policy 1.3 requires the designation of Town Centres in all *Core Settlement Areas*, with the Town of Comox being identified as a *Core Settlement Area*. The Town Centre for Comox as identified in RGS MG Policy 1.3 consists of the Downtown Centre as shown on *Figure 7 – OCP Growth Areas*. All of the Downtown Town Centre is designated Mid-Rise Mixed-Use, which supports residential,



commercial, and institutional buildings up to 6-storeys in height (including mixed uses), with a density of approximately 400 persons and jobs per hectare when built out, supporting the RGS target of 100-150 combined residents and jobs per hectare. In addition to the Downtown Centre, Corridors are identified to support mixed-use development close to transportation infrastructure and existing services and amenities. The OCP also identifies Mixed-Use Nodes that can function as small-scale neighbourhood centres that incorporate daily needs in existing single-detached neighbourhoods further from the Downtown Centre and growth Corridors.

RGS MG Policy 2B-1 requires OCPs to contain policies for agricultural areas that are consistent with the *Agricultural Land Commission Act* and regulations established under the Act, including the establishment of adequate buffers that ensure abutting farm and non-farm uses do not conflict and that non-farm uses do not impede agricultural activity within the Agricultural Land Reserve.

- Policy 9.9 outlines that the Town will not support Agricultural Land Reserve subdivision and exclusion applications unless it is demonstrated that there is a significant lack of future agricultural viability, in which case the Town may consider forwarding ALR subdivision applications to the ALC for evaluation and decision, or applying to the ALC for exclusion if warranted.
- Action 18.2 is to review and monitor Town bylaws, policies, plans and procedures to ensure consistency with ALC legislation and regulations.
- Policy 22.8 requires developing properties adjacent to the ALR to ensure that development limits associated negative impacts on adjacent agricultural operations by including appropriate buffers, setbacks and site planning, consistent with the BC Ministry of Agriculture Guide to Edge Planning, or any future iterations thereof.

Population and Employment Projections

This section identifies the relationship between the OCP and RGS regarding population and employment projections as required by the *Local Government Act*, and the relationship of housing growth to these projections.

Housing Growth

The RGS identifies 34% growth of dwelling units in the region from 2010-2030. Comox's 2024 Housing Needs Report identifies the need for 3,358 new housing units from 2021 to 2041, representing a 50% increase in total private dwellings, whereas BC Stats



household projections identify growth of 29% from 2021 to 2041. OCP policies aim to achieve the 3,358 targeted housing units from 2021 to 2041.

The land use designations in the OCP can accommodate more than 20 years of housing need. A likelihood of redevelopment analysis was completed for the Comox Complete Communities Growth Assessment. After filtering out land that is not statistically likely to redevelop, the OCP land use designations provide capacity for 7,760 net new units as identified in Table 3 of the OCP (Section 1 – Housing Needs). Dwelling unit growth in Comox will likely continue to be similar to the 34% regional projection identified in the RGS.

Population

The RGS identifies regional population growth of 31% from 2010 to 2030. The OCP identifies that population growth from 2021 to 2041 will likely be around 4,700 to 5,000 persons, representing 31% to 33% population growth.

The RGS identifies regional population growth of 31% from 2010 to 2030. The Town’s population grew by 33% from 2001 to 2021, the most recent 20-year period for which Census data is available. BC Stats population projections for Comox indicate slower population growth of 22% from 2021 to 2041; however, BC Stats projections outside of Census Metropolitan Areas are primarily based on the cohort-component methods. Cohort-component population projections may not consider factors that are outside of historical and projected fertility, migration, and mortality rates. An example would be increasing rates of development as a response to increasing demand from intra-provincial migrants that are struggling to afford housing in larger urban centres in BC. If 20-year housing need is fulfilled in Comox from 2021 to 2041, population growth will take place faster than BC Stats population projections, in the range 40-48% depending on average persons per new unit.

The Town is committed to improving the efficiency of development approval processes to increase growth rates and fulfill its role in accommodating housing needs. Work completed and underway for the Development Approval Process Review and Housing Accelerator Fund will optimize the Town’s processes. Comprehensive updates to the OCP, Zoning Bylaw, and Subdivision and Development Servicing Bylaw are also intended to increase development approval efficiency and the land amount of land available for different forms of development.



Employment

RGS employment projections identify a potential range of 29% to 53% growth from 2010 to 2030. 19 Wing Comox / Canadian Forces Base Comox are major regional employers located in the Town. Further, OCP Economic Development Objective 3(A.) is to increase the ratio of jobs to residents in Comox. Objective 3(A.) is intended to diversify the tax base, reduce the residential tax burden, and provide local jobs for residents to reduce greenhouse gas emissions from commuting. The Comox OCP designates approximately 30 gross hectares of vacant land for Business Park use, supporting a variety of employment options. Additional Economic Development policies identify the Town's intention to collaborate with the Department of National Defense and Comox Valley Airport Commission to facilitate expansion if desired by those organizations.

In addition to expansion of the Business Park land use designation, the 2026 OCP increases the amount of land designated for Mixed-Use compared to the 2012 OCP. Mixed-Use designations support a variety of commercial and institutional uses that can increase local jobs in Comox. Policies throughout the OCP aim to facilitate mixed-use growth in the Downtown Centre to provide new employment opportunities, services, and amenities in a location that is accessible by public transportation.

RCS Update Process

Legislation at the time of writing this OCP requires the Town to review the RCS at least once every five years after its latest acceptance by the CVRD Board, and if amendments are not proposed, submit the RCS to the Board for continued acceptance. Where an RCS is being amended, it must also be submitted for acceptance by the Board.

