

**Office of the Chair**

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File: 5360-30/Host

December 10, 2025

**Sent via email only:** [mayor.brown@cumberland.ca](mailto:mayor.brown@cumberland.ca)

Mayor Vickey Brown  
PO Box 340  
Cumberland, BC V0R 1S0

Dear Mayor and Council:

**Re: Referral Comments – Village of Cumberland Official Community Plan and Zoning Bylaw**

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On behalf of the Comox Strathcona Waste Management (CSWM) Board, thank you for the opportunity to review the Village of Cumberland's (Village) draft Official Community Plan (OCP) and zoning bylaw.

At its meeting on November 20, 2025, the CSWM Board received a report outlining an overview of preliminary feedback to the Village's Official Community Plan (OCP) and Zoning Bylaws, authorizing staff to complete a legal review and incorporate necessary updates to support CSWM's long-term interests and operational requirements at the Comox Valley Waste Management Centre (CVWMC) in alignment with both the Solid Waste Management Plan (SWMP) and the Village's vision.

**Resolution**

THAT the Board approve feedback to the Village's Official Community Plan and Zoning Bylaws such that staff:

- Complete a legal review of the proposed language to ensure Comox Strathcona Waste Management's long-term interests are protected; and
- Incorporate updates and findings from the legal review, in alignment with the staff report dated November 19, 2025, into the final submission to the Village;

*The Comox Strathcona Waste Management service area is located in the Coast Salish, Kwakwaka'wakw, and Nuu-chah-nulth territories.*

Comox Strathcona Waste Management manages over 100,000 tonnes of waste and recycled material annually and oversees a number of diversion and education programs for the Strathcona and Comox Valley Regional Districts.

AND FURTHER THAT the Co-Chairs be authorized to sign the final submission to the Village from Comox Strathcona Waste Management.

Results of the staff and legal review are identified in Schedule A (OCP) and Schedule B (Zoning) as attached to this letter.

The Board recognizes that the Village is proceeding toward bylaw adoption by December 31, 2025, and that a further round of minor amendments is planned following adoption.

Given the range of comments identified below, the Board encourages the Village to engage CSWM staff at the outset of that amendment process to support coordinated implementation and ensure that regional interests, operations and services are reflected. This engagement will help confirm shared understanding, address technical refinements and maintain alignment across jurisdictions. CVRD staff look forward to working with Village staff through the next update and ongoing implementation.

Overall, the CSWM Board acknowledges the significant effort that has gone into preparing the proposed OCP and zoning bylaw. The Board is confident that, with continued collaboration and coordination between our respective staffs, these remaining matters can be addressed in a way that supports both Cumberland's local priorities and the shared regional waste management vision set out in the updated Solid Waste Management Plan.

For questions or further details, please contact Vivian Schau, Senior Manager of CSWM Services, at [vschau@comoxvalleyrd.ca](mailto:vschau@comoxvalleyrd.ca) or 250-334-6025.

Thank you again for the opportunity to comment. The Board looks forward to continued work together as the Village moves through adoption and implementation.

Sincerely,

***W. Cole-Hamilton***

Will Cole-Hamilton  
Co-Chair

***M. Baker***

Mark Baker  
Co-Chair

Enclosure

cc: Courtenay Simpson, Director of Development and Bylaw Services  
Karin Albert, Senior Planner

## Schedule A – OCP Comments

It is imperative that the Village's OCP is supportive of the SWMP renewal work that is ongoing. Collaboration with Village staff on the OCP update has resulted in significant policy inclusions that secure the long-term viability and protect CSWM's operational interests. Important considerations, including the landfill height and the establishment of the 500-meter buffer per the Landfill Criteria, have been successfully integrated into the draft OCP.

CSWM staff review of the OCP has identified the following areas for further collaboration with the Village:

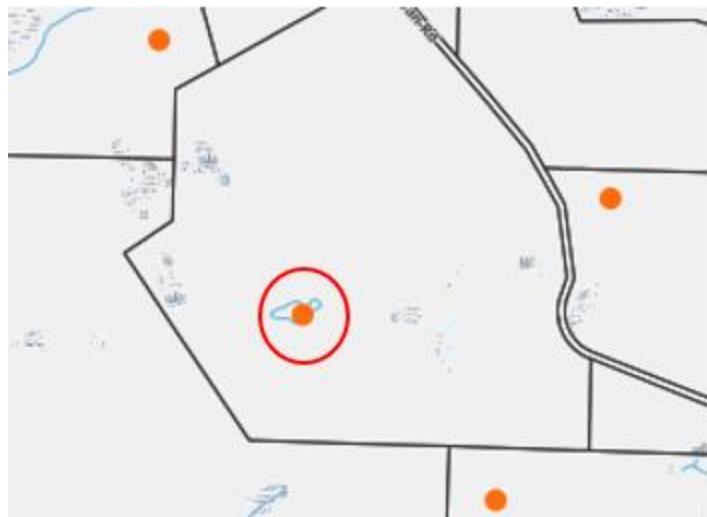
- Amend the solid waste management section to clarify that the Host Community Agreement is an operational contract, not land-use policy. Suggested edits include:

The host community agreement with the CVRD is an operational contract, which should balance the impacts the Village may experience in hosting the CVWMC against the advantages received by the users of the facility. Current and potential impacts to the Village of hosting the CVWMC in the community include visual quality impacts as the cells reach their maximum height, reduced development potential of adjacent properties, odours within the Village, litter along Bevan and Cumberland Roads, and impacts on Bevan and Cumberland Roads from large trucks and landfill traffic.

- Amend the solid waste management section to reference the Host Community Agreement, as well as the initial and annual contributions to the Village.
- Replace Policy 7 wording that frames “benefits versus impacts” to avoid implying re-negotiation and draft alternative language jointly.
- Confirm that Policy 7 may be ultra vires and requires legal review rather than only reframing.
- Correct mapping errors, including the non-existent waterbody within the landfill footprint and inaccurate watershed boundaries.
- Update Pigeon Pond hydrology to reflect that it does not drain toward Black Lake or Comox Lake due to subsurface conditions.
- Provide justification for terrestrial ecosystem mapping within operational areas or remove it to prevent unintended restrictions.
- Ensure the 500-metre buffer reflects landfill master plan boundaries for cells 1–5 rather than lot lines and confirm associated exclusions.
- Remove or relocate the municipal park shown within industrial lands, as it is incompatible with landfill operations.
- Confirm that non-conforming use is not acceptable for long-term operations and that zoning must explicitly list all core and accessory uses to avoid regulatory risk.
- Identify that the restrictive I-3 and I-4 footnote unintentionally limits required

diversion activities and should be reworded before adoption.

- Note CSWM's preference to correct these items in the current OCP and zoning update rather than deferring to the 2026 housekeeping process to avoid future uncertainty.
- It is requested that the following "Notice of Works, Mines Act Permits" be removed from OCP Map D "Areas Suitable for Sand and Gravel Extraction" as it has been abandoned.



Further, in Schedule B (Zoning Bylaw Analysis), there is a comment that has an implication to the OCP.

I-3 zoning for the entire waste management centre parcel (PID 031-451-918) to support future CSWM operational needs

- The 100-metre strip on the west side of the property and the triangular area in the southwest were consolidated into the parcel in 2021. These areas remain zoned Forest Stewardship Greenway (FSG). CSWM requests that these portions be rezoned to I-3 so that the entire parcel is consistently zoned and better aligned with long-term operational requirements.
- Corresponding updates to the OCP land use designation are also requested to ensure the OCP and zoning bylaw remain aligned for the full parcel.

## Schedule B – Zoning Bylaw Comments

The intent of the following comments is to ensure that the proposed Zoning Bylaw enables CSWM to continue to meet existing and long-term operational requirements, allow for future expansion or upgrades, and that CSWM's interests are adequately protected.

The Comox Valley Waste Management Centre (CVWMC) is located within the Village of Cumberland jurisdiction (PID 031-451-918). The proposed Bylaw split-zones this property between Refuse Industrial (I-3) where the CVWMC is located, and Forest Stewardship Greenway (FSG) where the 100m strip of land to the west and the triangle in the southwest of the subject property were consolidated with the subject property in 2021. The I-3 zone is intended to accommodate the CVWMC; the name and intent of this zone is very similar to the current Zoning Bylaw's Refuse Industrial (I-4) zoning of the property.

For regulatory consistency, CSWM staff note that the Environmental Management Act (section 37) sets out that an approved Solid Waste Management Plan (SWMP) prevails over conflicting provisions in a zoning bylaw. Three main areas have been identified to ensure clarity and eliminate any potential legal uncertainty, and the suggestions below aim to proactively ensure the proposed Bylaw supports the intended waste management operations, in alignment with the SWMP:

### 1. *Proposed I-3 Zone's Permitted Uses & Definitions Limit CSWM Uses*

- It is important that the I-3 zone expressly permits all essential CVWMC activities that are currently undertaken or are necessary to support solid waste management and diversion, such as equipment repair, fuel storage for equipment/vehicle refueling, maintenance and storage of equipment and vehicles, repair of heavy machinery, and natural resource extraction. These are not expressly permitted uses under the proposed I-3 zoning of the site.
- While CSWM's essential activities, as noted above, are currently covered by legally non-conforming status, this protection is limited. The non-conforming provisions of the *Local Government Act* prohibit expansion and revokes protection if use is discontinued for six consecutive months. The intent of non-conforming use provisions is to phase out non-conforming uses over time. Furthermore, the Village's interpretation leaves room for subjective judgment. To mitigate long-term regulatory risk, CSWM would like to see all essential CVWMC operations explicitly listed as permitted uses in the I-3 zone (including those currently protected by legal non-conforming status) to eliminate regulatory uncertainty and provide transparency to adjacent landowners. Staff suggest that it is not in the public interest to leave the ambiguity in place nor to require that future planned expansions be subject to future zoning amendment applications.

- Staff propose a new principal use and associated definition in place of "Refuse Disposal Facility" and "Recycling Facility" that more accurately reflects the CSWM's current and long-term operational requirements and allow for future expansion and upgrades as prescribed in the SWMP. The proposed zoning bylaw permits the use of the CVWMC as a recycling facility; however, the definition of that use specifies that the collection, storage, and distribution of recyclable materials must be carried out wholly within an enclosed building or structure, and further prohibits recyclable material processing and outdoor storage. This prevents the management of materials at the CVWMC such as construction waste, wood waste grinding, or scrap metal. Identifying the principal use as a "Solid Waste Management Facility" would more accurately reflect the fact that the site is used for a variety of solid waste management purposes that include the disposal, recycling and diversion of solid waste. By differentiating the CVWMC's operations from a "recycling facility," the limitations on the outdoor processing and storage of recyclable materials could be removed, while leaving those restrictions in place for the purpose of a "recycling facility," as allowed in the I-2 zone. A reference to "resource recovery" (see proposed definition below) would make it clear that separating materials from solid waste for reuse, as well as recovering landfill gas for energy production, are inherent uses of the operation of the solid waste management facility. A potential definition could be:
  - "Solid Waste Management Facility" means premises where the disposal, landfilling, processing, treatment, storage, collection, recycling, management and diversion of municipal solid waste, hazardous waste, industrial waste, demolition waste, construction waste and organics are conducted under a permit, operational certificate or solid waste management plan under the *Environmental Management Act*, and includes the collection, storage and management of recyclable materials, and resource recovery operations, that are conducted in conjunction with the operation of a Solid Waste Management Facility.
- Staff propose the addition of "Solid Waste Management Support Facility" as a permitted secondary use in the I-3 zone in order to expressly permit these required accessory uses that actively occur on the property:
  - "Solid Waste Management Facility Support Services" means uses that are accessory to the operation of a Solid Waste Management Facility, including fuel storage, and the storage, maintenance, and repair of machinery, vehicles and equipment.
- To promote house moving and the reduction of demolition waste going to landfill as contemplated in the SWMP, staff recommend that the I-3 zone increase the allowance for temporary storage of detached dwelling units that are in the process of being moved from one site to another. This could be achieved by amending the footnote to the permitted secondary "Storage, Outdoor" use (Table 12.2(1), such as:

"Outdoor storage may include the temporary storage, on no more than x percent of the lot area, of detached dwelling units being moved from one lot to another."

- Defined Terms:
  - Add "Resource Recovery" as a new defined term to support the proposed "Solid Waste Management Facility" principal use definition, as follows:
    - "Resource Recovery" means the process of separating, sorting and recovering useable materials or energy from waste.
  - The following definition amendment to "Recycling Facility" is suggested for the following purposes:
    - to avoid uncertainty arising from the potential overlap with the definition of "Solid Waste Management Facility" and "Recycling Facility", and
    - to address CSWM's concerns about the restrictions (within an enclosed building, no outdoor storage) that "Recycling Facility" includes:
      - "Recycling Facility" means premises, other than those used as a Solid Waste Management Facility, that are used to collect, temporarily store and distribute recyclable materials pursuant to the *Environmental Management Act*, including facilities for the collection of products under the *Recycling Regulation B.C. Reg. 449/2004* from members of the general public.
  - The following definition amendment to "Wrecking Yard" (which is not a permitted use in the I-3 zone, but is in other zones) is suggested to avoid uncertainty arising from the potential overlap with the definition of "Solid Waste Management Facility":
    - "Wrecking Yard" means premises, other than those used for Solid Waste Management Facility operations, that are used for the collection, demolition, dismantlement, storage, salvage, recycling, or sale of waste materials including scrap metal, vehicles, machinery, and other discarded materials.

## 2. *Restrictive Footnote 4 Limits CSWM Uses*

- The use of the northern portion of the subject property (purchased in 2021) for future diversion activities that will require outdoor processing is contemplated within the SWMP (i.e. construction and demolition waste staging, sorting, high grading). As such, it is important that this use be permitted. There are two main areas of concern that limit this use: permitted uses and definitions in the I-3 zone as currently proposed (addressed above) and the restrictive footnote within the I-3 zone (Table 12.2(1), Footnote 4) on the northern portion of the subject property, restricting "Refuse Disposal Facility." It is requested that this restrictive footnote be amended to ensure that the zoning permits the planned waste diversion

expansion to the northern portion of the parcel (including outdoor staging and sorting of construction and demolition waste), which is necessary to achieve the SWMP diversion goals. The waste diversion expansion is consistent with the objectives of the Regional Growth Strategy.

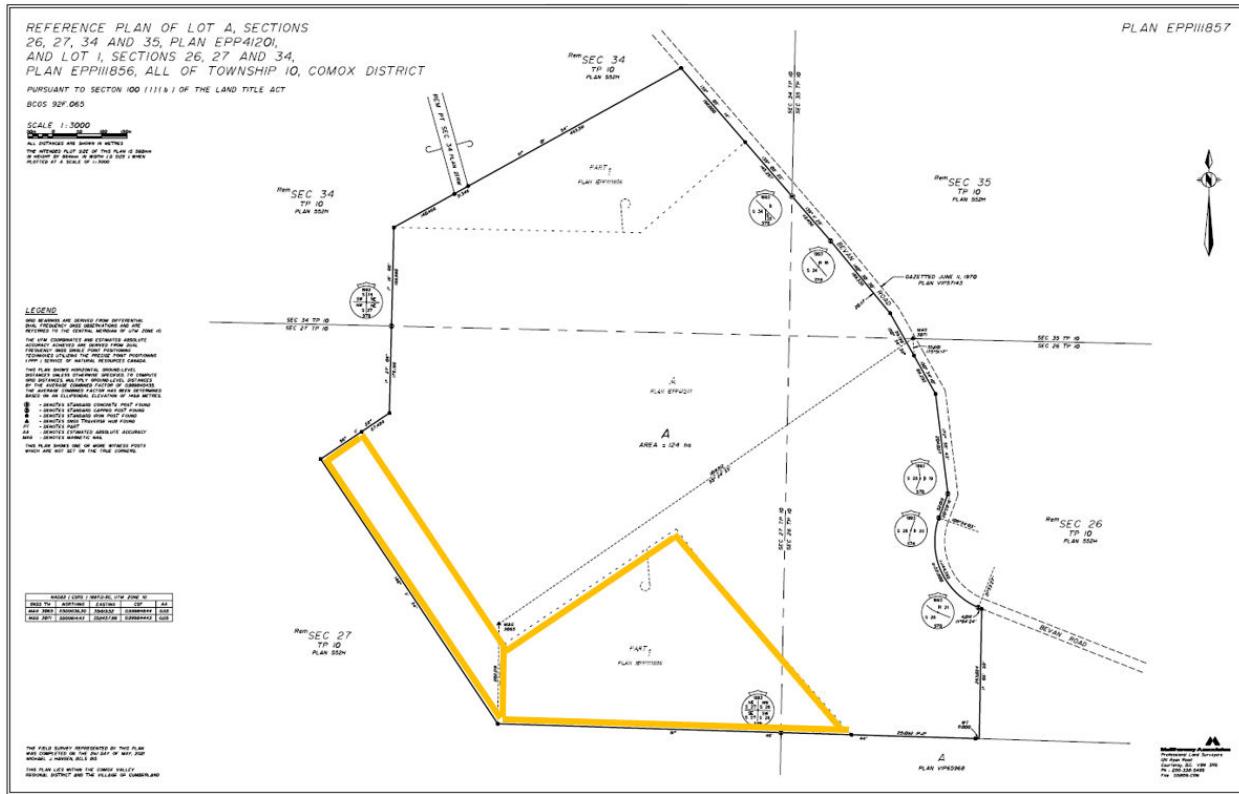
- A further requested edit of this footnote is requested for clarity on which portion of land is being referred to. Plan EPP111857 consolidated three separate parcels of land with the subject property (CVWMC site): the northern parcel, which this footnote is intended to reference, the 100m strip of land to the west and the triangle in the southwest.

The requested amendment to the footnote to the new definition of "Solid Waste Management Facility" is as follows:

- "Landfilling of municipal solid waste is not permitted within the northern portion of the lot legally described as LOT A, SECTIONS 26, 27, 34 AND 35, TOWNSHIP10, COMOX DISTRICT, PLAN EPP111857 (Comox Valley Waste Management Centre) as indicated in Figure 12-1. For clarity, this is the northern portion of land that was added to the Comox Valley Waste Management Centre property in 2021 in Plan EPP111857."

*3. I-3 Zoning for Entire Comox Valley Waste Management Centre Parcel to Enable CSWM's Future Operational Needs (PID 031-451-918)*

- As aforementioned, the 100m strip of land to the west and the triangle in the southwest of the subject property were consolidated with the subject property in 2021. These portions of the property are zoned Forest Stewardship Greenway (FSG). It is requested that consideration be given to amending the zoning of these lands to I-3, so that the entire subject property is under the I-3 zone. This would future-proof CSWM's operational needs.



CSWM welcomes collaboration with the Village regarding drafting and implementation and can share more detailed information including draft proposed definitions and further rationale upon request.

## Karin Albert

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**From:** Gothard, Nancy <ngothard@courtenay.ca>  
**Sent:** December 10, 2025 5:24 PM  
**To:** Karin Albert  
**Cc:** Courtney Simpson; O'Connell, Kate  
**Subject:** Courtenay Referral - Cumberland OCP Bylaw No. 1230

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Many thanks Karin for the opportunity to comment and apologies for getting this truly under the wire.

Please find below a summary of comments from City of Courtenay staff on the Comox updated OCP.

Please let me know if you have any questions.

**1. City staff observed some policy responses in the Cumberland OCP amendments that City could learn from may be in touch:**

- Section 6.2 Views and Landscape Character. The City does not have the same visually sensitive areas (that are subject to change) that Cumberland does (e.g. due to forestry), but we are also wishing to identify and protect key views of community importance.
- Section 6.3.2 Wildland Urban Interface. The City does not have known elevated wildfire risk to the community based on most recent information however we strongly support collaboration and coordination on this topic as identified in the Cumberland policies. The City will be reviewing our Tree Bylaw following an update to our Urban Forest Strategy to reflect the infill direction of SSMUH.
- Heritage – the City has limited heritage designated properties, has OCP policy directing to explore this opportunity in select neighbourhoods, and is working within the context of SSMUH legislation.
- Zoning bylaw: We would welcome learning from your experience on non-standard bike parking requirements in the zoning bylaw, wider application of home occupation permitted uses, and the City is also interested in establishing zoning for shoreline of Courtenay River and K'omoks Estuary including surface water and would be interested in sharing research on this (similar to Cumberland Freshwater designation).
- Planning would welcome discussing with Cumberland staff the implementation of your environmental development permit areas.

**2. City staff observe some future major work for Cumberland and make note:**

- Re: Cumberland Stormwater Management Plan work item - City's Integrated Rainwater Management Plan, a thorough process to understand how to manage rainwater sustainability and effectively. More at: <https://www.courtenay.ca/city-hall/corporate-information/master-plans-and-strategies/integrated-rainwater-management-plan>
- The City also supports regional collaboration on transportation planning for all modes. I will share the identified project of transportation/connectivity multi-modal pathways connecting the Village of Cumberland and City of Courtenay with the City's Strategic Transportation Plan staff (Matthew Brown).

3. **Regional Non-Market Housing Needs** - Regional services for residents experiencing homelessness tend to be concentrated in Courtenay but the inadequacy in our collective housing system can be understood in a regional context. City staff look forward to continuing regional collaboration on regional housing action plan including homelessness action plan, and including discussions of financial and resource contributions of all local municipalities towards regional supportive below-market housing and emergency shelters (concentrated within the City of Courtenay).

4. **Comments on more operational considerations:**

- **5 year planning cycles** – as municipalities will be working on same housing needs, OCP and Zoning bylaw and infrastructure plan updates, opportunity to align infrastructure plans together that have cross boundary impacts. This includes timing of DCC/ACC updates. Would welcome a general approach to knowing with adjacent municipalities are working on so staff can share ideas and coordinate where appropriate, with intent of regional consistency where appropriate and efficiency in time, with possible wider public education coordination potential.
- **Development regulation standards** – While more an operational topic, and where respective jurisdictional policy supports, City staff welcome opportunities to align regulatory consistency to support more rapid and coordinated delivery of housing and uses to support complete communities, including infrastructure.
- **Public education** – I notice a couple of instances of public education opportunities across our municipal boundaries (e.g. on rainwater management). While each project must be evaluated on its merit, the City supports exploring opportunities to coordinate education opportunities where appropriate.
- **RGS implementation** – City staff support regular meetings of the Technical Advisory Committee to collaborate on regional issues as identified, but not limited to, the Regional Growth Strategy.

Take care,

Nancy Gothard (she/her) | City of Courtenay  
Manager of Community & Sustainability Planning

[\\*Why I list my pronouns](#)

T Work: 250-703-4839 | [E ngothard@courtenay.ca](mailto:ngothard@courtenay.ca)



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[courtenay.ca](http://courtenay.ca) | [Facebook](#) | [LinkedIn](#) | [Instagram](#)

I respectfully acknowledge that the land on which we gather and work is the Unceded traditional territory of the K'ómoks First Nation.

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**From:** Karin Albert <[kalbert@cumberland.ca](mailto:kalbert@cumberland.ca)>  
**Sent:** Thursday, November 13, 2025 10:37 AM  
**To:** Gothard, Nancy <[ngothard@courtenay.ca](mailto:ngothard@courtenay.ca)>; Garbutt, Geoff <[ggarbutt@courtenay.ca](mailto:ggarbutt@courtenay.ca)>; O'Connell, Kate <[koconnell@courtenay.ca](mailto:koconnell@courtenay.ca)>

**Cc:** Courtney Simpson <CSimpson@cumberland.ca>  
**Subject:** RE: Referral - Cumberland OCP Bylaw No. 1230

Hi Nancy,

We are fine with a staff response but whatever you think is appropriate.

If you feel the Cumberland OCP has implications for the City of Courtenay, you might want to take it to your Council. Otherwise, it may just be a notice in your weekly Council reader (or whatever system you might have to keep your Council informed) and the referral response can come from staff.

Thanks,

Karin

**Karin Albert**, MRM, MCP, RPP (she/her)

Senior Planner

p: 250-336.3011 | e: [kalbert@cumberland.ca](mailto:kalbert@cumberland.ca)

**Village of Cumberland**

**OUR STRATEGIC PRIORITIES: Diverse and Healthy Community | Sustainable Service Delivery | Community Planning**

***The Village of Cumberland respectfully acknowledges that the land we gather on is on the Unceded Traditional Territory of the K'ómoks First Nation, the traditional keepers of this land.***

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**From:** Gothard, Nancy <[ngothard@courtenay.ca](mailto:ngothard@courtenay.ca)>  
**Sent:** November 12, 2025 5:22 PM  
**To:** Karin Albert <[kalbert@cumberland.ca](mailto:kalbert@cumberland.ca)>; Garbutt, Geoff <[ggarbutt@courtenay.ca](mailto:ggarbutt@courtenay.ca)>; O'Connell, Kate <[koconnell@courtenay.ca](mailto:koconnell@courtenay.ca)>  
**Subject:** RE: Referral - Cumberland OCP Bylaw No. 1230

Thank you Karin,

Can you clarify if you're expecting comments at a staff level or City Council?

Take care,

**Nancy Gothard (she/her) | City of Courtenay**  
Manager of Community & Sustainability Planning

[\\*Why I list my pronouns](#)

T Work: 250-703-4839 | E [ngothard@courtenay.ca](mailto:ngothard@courtenay.ca)



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**From:** Karin Albert <[kalbert@cumberland.ca](mailto:kalbert@cumberland.ca)>  
**Sent:** Wednesday, November 12, 2025 5:00 PM  
**To:** Garbutt, Geoff <[ggarbutt@courtenay.ca](mailto:ggarbutt@courtenay.ca)>; O'Connell, Kate <[koconnell@courtenay.ca](mailto:koconnell@courtenay.ca)>; Gothard, Nancy <[ngothard@courtenay.ca](mailto:ngothard@courtenay.ca)>  
**Subject:** Referral - Cumberland OCP Bylaw No. 1230

Dear local government colleagues,

Attached is the referral for the Village of Cumberland Official Community Plan, Bylaw No. 1230.

Given the provincial deadline for adoption of OCPs by the end of the year (to designate sufficient lands to meet the projected 5- and 20-year housing need), we would appreciate any feedback you may have by Monday, December 1.

I understand that is a very tight timeline and we will accept last comments until Wednesday, December 10.

The attached referral links to the OCP Bylaw on our [/engagecomoxvalley.ca/Cumberland](http://engagecomoxvalley.ca/Cumberland) site. To help you with your review, the referral also links to summary documents that highlight key changes in the new OCP.

We look forward to receiving your comments.

Best regards,

Karin

**Karin Albert**, MRM, MCP, RPP (she/her)

Senior Planner

p: 250-336.3011 | e: [kalbert@cumberland.ca](mailto:kalbert@cumberland.ca)

**Village of Cumberland**

**OUR STRATEGIC PRIORITIES: Diverse and Healthy Community | Sustainable Service Delivery | Community Planning**

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# REFERRAL



DATE: November 14, 2025

File No. 3360-01

FROM: Courtney Simpson, Director of Development and Bylaw  
SUBJECT: Village of Cumberland Zoning Bylaw No. 1238, 2025

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***Please provide responses to [csimpson@cumberland.ca](mailto:csimpson@cumberland.ca).***

***We would appreciate any feedback you may have by Monday, December 1 to help us meet provincial timelines for adoption of Zoning Bylaws. We understand that is a very tight timeline. Referral responses received before the public hearing, tentatively scheduled for December 15, will be included in the public hearing package for Council and public review.***

***You may complete the attached response form or reply in the body of your return email.***

The Village of Cumberland Council gave first and second reading to Zoning Bylaw No. 1238, 2025 (Bylaw 1238) on Monday, November 10, 2025. If adopted, this bylaw will replace the Zoning Bylaw No. 1027, 2016. Bylaw 1238 is posted at [engagecomoxvalley.ca/zoning-bylaw-update](http://engagecomoxvalley.ca/zoning-bylaw-update)

The primary purpose of the new Zoning Bylaw is to ensure the Village can demonstrate that sufficient lands have been zoned to accommodate the 20-year housing need identified by December 31, 2025, per the requirements of the *Local Government Act*.

A secondary objective is to proactively implement the small scale multi-unit housing legislative requirements ahead of the 2026 Census, when it is anticipated that the Village's population will surpass 5,000. The additional infill density that will be permitted through SSMUH is one of the ways that the Village will accommodate its 20-year housing need. The new Zoning Bylaw also aligns with the newly updated OCP (*in progress*), along with modernizing the Bylaw to integrate best practices to improve its overall clarity, transparency, and ease of use.

To assist you with your review, you may wish to read the reports to Council on September 15, 2025 and November 10, 2025 for a summary of key changes. These are posted on the project website under "Documents Library".

Comments received from this referral will be presented to Council in advance of the public hearing of Bylaw 1238, tentatively scheduled for December 15, 2025.

## ATTACHMENTS

1. Referral Response Form



## REFERRAL RESPONSE FORM

### REFERRAL

#### Village of Cumberland Zoning Bylaw No. 1238, 2025

From:

Interests Unaffected  Interests Affected

Comments / Requested Changes:

The City of Courtenay's Development Services department appreciates the opportunity to provide comment on the "Village of Cumberland Zoning Bylaw No. 1238, 2025". This Bylaw update appears consistent with current planning practices and supports a clear regulatory framework for future development. Staff provide the following comments:

#### Land- Use Interface

Land-use interface considerations between the Village and the City of Courtenay (the City) are anticipated to be limited, as City lands are not directly adjacent to the Village of Cumberland boundaries and are separated by Comox Valley Regional District Electoral Areas A and C.

#### Residential

Acknowledge this bylaw update will modernize the Village's approach to land use zoning by incorporating provisions aligned with the provincial mandate of pro-active planning to accommodate additional residential density within the Village's boundary.

#### Transportation and Infrastructure

The proposed increase in residential density may increase traffic flow to and from Courtenay and related infrastructure investment, particularly along the Comox Valley Parkway and in major commercial areas. The City encourages continued coordination between regional partners regarding transportation networks, active transportation connectivity, and regional servicing.

#### Environment and Watershed

Acknowledge the proposed rezoning of lands from Industrial (I-2) and Working Forest (WF) to Parks and Open Space (PU-1) is anticipated to yield positive ecological benefits. Several important wetlands and creek systems—including Morrison Creek within the Bevan Industrial Lands area and Perseverance Creek—ultimately flow into the City and play a critical role in shaping local hydrologic conditions. Updating the land use zoning in this way supports watershed protection, strengthens natural ecosystem functions, and aligns with the City's broader environmental management objectives.

We look forward to learning of your progress with the Bylaw update. If you have any questions regarding these comments, please do not hesitate to contact us directly.

Sincerely,

Andrew Stewart-Jones, Planner 2

'cc'ed

Jamai Schile, Manager of Development Planning

Kate O'Connell, Acting Director of Development Services

## Karin Albert

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**From:** Robin Pallett <rpallett@comox.ca>  
**Sent:** November 14, 2025 10:33 AM  
**To:** Karin Albert  
**Cc:** Randy Houle  
**Subject:** FW: Referral - Cumberland OCP Bylaw No. 1230

Hi Karen,

Thanks for the referral. Comox planning staff have no comments.

Best regards,



**Robin Pallett** RPP, MCIP

Planner II

Town of Comox

250-703-9995 – [Comox.ca](http://Comox.ca)

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I respectfully acknowledge that the land on which we gather and work is on the unceded traditional territory of the K'ómoks First Nation, the traditional keepers of this land.

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**From:** Karin Albert <[kalbert@cumberland.ca](mailto:kalbert@cumberland.ca)>

**Sent:** November 12, 2025 4:54 PM

**To:** Randy Houle <[rhoule@comox.ca](mailto:rhoule@comox.ca)>; Marianne Wade ([mwade@courtenay.ca](mailto:mwade@courtenay.ca)) <[mwade@courtenay.ca](mailto:mwade@courtenay.ca)>; Alana Mullaly <[amullaly@comoxvalleyrd.ca](mailto:amullaly@comoxvalleyrd.ca)>; Marc Rutten <[mrutten@comoxvalleyrd.ca](mailto:mrutten@comoxvalleyrd.ca)>; Doug DeMarzo <[ddemarzo@comoxvalleyrd.ca](mailto:ddemarzo@comoxvalleyrd.ca)>

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**Subject:** Referral - Cumberland OCP Bylaw No. 1230

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Dear local government colleagues,

Attached is the referral for the Village of Cumberland Official Community Plan, Bylaw No. 1230.

Given the provincial deadline for adoption of OCPs by the end of the year (to designate sufficient lands to meet the projected 5- and 20-year housing need), we would appreciate any feedback you may have by Monday, December 1.

I understand that is a very tight timeline and we will accept last comments until Wednesday, December 10.

The attached referral links to the OCP Bylaw on our engagecomoxvalley.ca/Cumberland site. To help you with your review, the referral also links to summary documents that highlight key changes in the new OCP.

We look forward to receiving your comments.

Karin

**Karin Albert**, MRM, MCP, RPP (she/her)

Senior Planner

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**Village of Cumberland**

**OUR STRATEGIC PRIORITIES: Diverse and Healthy Community | Sustainable Service Delivery | Community Planning**

***The Village of Cumberland respectfully acknowledges that the land we gather on is on the Unceded Traditional Territory of the K'ómoks First Nation, the traditional keepers of this land.***

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