

Our File: 2211-47840-01

April 8, 2026

Town of Comox – Planning Department  
1809 Beaufort Avenue  
Comox, BC  
V9M 1R9

Attention: Randy Houle, Director of Development Services

## **Proposed Development of LOT D, DISTRICT LOT 217 COMOX DISTRICT, PLAN 47754, PID: 012-567-281 – Development Permit Area (DPA) 9 Application**

On behalf of our client, Comox Valley Airport Commission (CVAC), we are pleased to submit this NE Comox Development Permit Application for 1301 Knight Road (“subject property”) for the Town’s review and processing. CVAC is working towards the re-development of the subject property relative to the relocation of Vancouver Island Enterprises (VIE) which is currently located on 1200 Military Row, directly opposite the subject property and along the north side of the Knight Road right-of-way. The general site plan for VIE Operations on the subject property is shown in **Figure 1** below, and shown more clearly in the supporting documents included in this application.



Figure 1: Preliminary Site Plan – 1301 Knight Road



The subject property is a 2.5 ha property located at 1301 Knight Road. The property is zoned E-3, “Light Industrial” and currently has a re-zoning application on file with the Town to create a new zone that allows for all of VIE’s site operations to occur on the property. Shown in Figure 2, the subject property is within a North East Comox Permit Area.



Figure 2: Town of Comox: DPA 9 North East Comox

To facilitate the project, the following site activities are anticipated:

- Maintain Erosion and Sediment Control (ESC) measures on the property throughout the relocation, consistent with Town Bylaw No. 1824.
- Install asphalt surfacing at north end of the site.
- Relocate bin infrastructure, equipment, and materials from 1200 Military Row.
- Construct two stormwater management ponds to offset changes in hydrology.

### Development Permit Guideline Compliance

Per DPA 9 Guidelines, no alteration of land can occur unless the applicant first obtains a development permit. Table 1 outlines both the applicable DP guideline and how this proposal is compliant.

The existing land condition is mostly forested, with gravel driveway access to an existing house and two communication towers. There is currently a soil stockpile on the central part of the property. The remaining forested areas on the property were cleared in February/March 2026. The proposed land use is the VIE operations yard and soil stockpiles, resulting in a change in the hydrologic response of the area. To mitigate these impacts, two stormwater dry detention ponds in conjunction with absorbent landscaping (soil stockpiles) are proposed on the property. The intent of the stormwater management ponds is to slow down the rainfall runoff leaving the property and allow for natural groundwater recharge to occur with a significant amount of permeable surfacing specified on the property.

The risk to existing downstream infrastructure is considered low, given existing and proposed conditions on the property, the size of the property relative to the Queen’s Ditch drainage catchment, and no (existing or proposed) direct connection to a stormwater outfall (e.g., piped outlet to ditch or watercourse).



The proposed stormwater detention ponds can be designed to mitigate changes in peak flows up to the 100-year storm event (per Bylaw 2048, Section 4.3.2.2).

*Table 1: DPA 9 Guideline Compliance*

<i>DPA 9 Guideline</i>	<i>Response / compliance</i>
<p>The quantity and quality of ground water flows to Lazo Marsh, Hilton Springs and ALR lands to the north of Lazo Marsh, east of Pritchard Road and south of Knight Road, should be maintained in relation to existing site conditions</p>	<p>Stormwater management for the development will be in accordance with the Town of Comox “post to pre” stormwater management approach. Past geotechnical investigations (by others), current groundwater monitoring programs, and infiltration testing (by McElhanney) on the property and nearby properties indicate that there is low groundwater recharge potential due to confining layers at and below ground surface. The proposed concept will maintain existing patterns and proposes to discharge runoff to vegetated on-site areas. All proposed permanent infrastructure and stormwater management features will be located outside of the 12m SPEA setbacks of the watercourse along Knight Road.</p>
<p>The impact of surface and ground water flows on flood frequency and duration on lands downstream and down-slope of this DPA for up to and including the 100-year storm event should be the same or less than existing site conditions.</p>	<p>DPA 9 and North East Comox Special Requirements (Bylaw 2048, Schedule 7) set engineering standards for long-term watershed-scale development. For the development on the subject property, the Town of Comox’s “post to pre” stormwater management approach to stormwater will be referenced, ensuring downstream protection. Proposed strategies will keep cumulative storm flows at or below current site levels for events up to a 100-year storm.</p>
<p>A 15-metre undisturbed natural state buffer must be provided from the Natural Boundary of Hilton Springs and the Top of Bank of the conveyance ditch located along the road dedication for Cambridge Road, as identified on a BCLS certified by a British Columbia Land Surveyor (BCLS) certified site plan.</p>	<p>The natural boundary of Hilton Springs is noted to be located along the east end of Cambridge Road and is several hundred meters away from the site development at 1301 Knight Road. The buffer requirements are not applicable to 1301 Knight Road development.</p>
<p>A report by a professional engineer with expertise in geotechnical engineering or hydrology and a professional agrologist may be required in accordance with Comox Planning Procedures Bylaw 1780 addressing measures necessary to ensure:</p> <ul style="list-style-type: none"> <li>• the quality and quantity of ground water flows are maintained in relation to existing site conditions; and</li> <li>• the impact of surface and ground water flows on flood frequency and duration on lands downstream and down-slope of this DPA for up to and including the 100-year storm event should be the same or less than existing site conditions</li> </ul>	<p>A stormwater management plan has been completed for DPA 9 to demonstrate that surface and groundwater flows will be maintained for the proposed site use (VIE operations). This plan is submitted along with supporting hydrogeology investigation information to demonstrate compliance with quality and quantity of groundwater flows and that surface and groundwater flows will be equal to or less than existing site conditions.</p>



<p>The subdivision of land; alteration of land, including vegetation; or construction of, addition to, or alteration of a building or other structure should be in accordance with any required professional engineer and professional agrologist impact assessment report, including any works or protective measures specified.</p>	<p>The subject property is currently covered with gravel, soil stockpiles, and forested areas. There is an existing dwelling that will remain. All operations activity will comply with the stormwater management prepared in accordance with Bylaw 2048. The subject property borders the ALR lands to the east and the project will comply with the 8m ALR buffer established by the Town of Comox.</p>
---	---

## Rationale

The intent of this application is to support the relocation of VIE operations stage of the development of the site. A DPA 8 (Riparian Ecosystems) Application and Erosion and Sediment Control (ESC) Permit Application for the project were submitted previously. A new DPA 8 application for this phase of the development (Part 2 – Relocation of VIE) is not required as the development footprint has not changed the application covers the development activities proposed for VIE’s relocation. Further coordination with the Town of Comox is needed to confirm the current ESC permit can remain valid for VIE’s relocation activities.

The DPA 9 Application was made via the Citywide Portal. To support the online application, the following documents were uploaded:

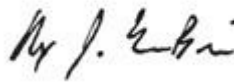
- Current title search
- Copies of charges/covenants
- Agent authorization form
- Contaminated sites screening form
- Stormwater Management Plan accompanied by Drawings set “2211-47840-01 1301 Knight Rd Ph 1A VIE RELOCATION - ISSUED FOR DPA”
- Cheque in the amount of \$1,000 representing the application fee (Delivered to Town Hall, separately)

Should additional information or clarification be required, please contact the undersigned.

Sincerely,  
McElhanney Ltd.



Emma Rose, EIT  
Junior Engineer  
[erose@mcelhanney.com](mailto:erose@mcelhanney.com)  
250-338-5495



Alex McBride, P.Eng.  
Project Manager  
[amcbride@mcelhanney.com](mailto:amcbride@mcelhanney.com)  
250-338-5495

