

1301 Knight Road

Rezoning Application

February 11, 2026

Town of Comox
1809 Beaufort Avenue
Comox, BC, V9M 1R9

Attention: Planning Department

Contact

Corey Cooper
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Rezoning Application

PID 012-567-281

On behalf of our client, Comox Valley Airport Authority, we are pleased to submit this Letter of Intent in support of the above-noted Rezoning Application. The purpose of the application is to facilitate the proposed relocation of Vancouver Island Enterprises (VIE) to 1301 Knight Road in the Town of Comox, hereafter referred to as the Subject Property. VIE's operations include outdoor land uses which are currently prohibited in the E-3 Zone, specifically: Sorting of Soils and Gravel; Processing of Compost; outdoor storage of material (stockpiling); and screening of soil material.

As per the Town's application requirements, the following documents have been attached:

1. Letter of Intent (*this document*)
2. Title Search & Charges
3. Charges Table (*within this document*)
4. Authorization Form
5. Zoning Bylaw Comparison Table (*within this document*)
6. Contaminated Sites Screening Form
7. Proposed Comprehensive Development Zone

These documents have been provided as appendices to this Letter of Intent, as well as separated as electronic versions for ease of use and review.

We look forward to your review of the application. Please do not hesitate to reach out for any further information required for this application, we will be happy to assist.

Thank you for considering this proposal.

Sincerely,
McElhanney Ltd.

Alex McBride
amcbride@mcelhanney.com
778-225-0218

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- 1. Authorization Form
- 2. Title Search & Charges
- 3. Contaminated Sites Screening Form
- 4. Draft Comprehensive Development Zone

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LOT D, DISTRICT LOT 217, COMOX DISTRICT, PLAN 47754

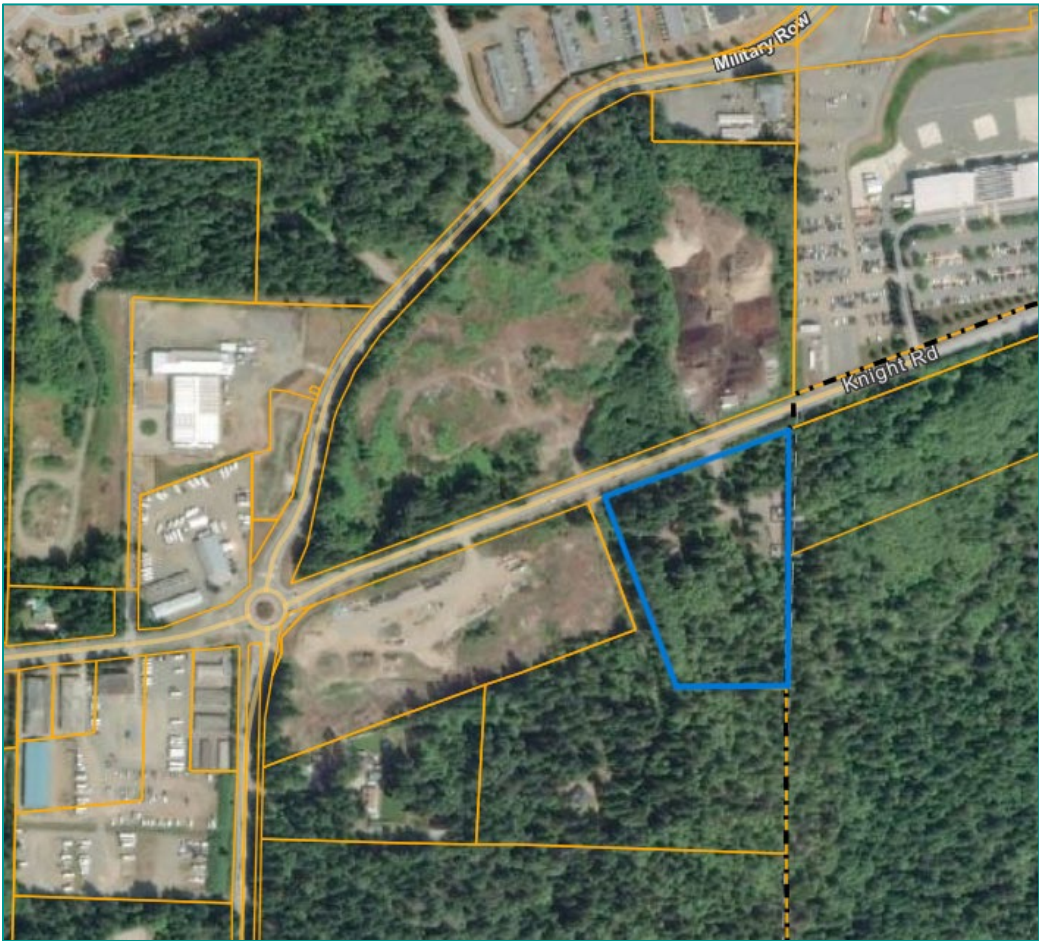
Intent of Proposal

Our client is proposing to rezone 1301 Knight Road to permit Vancouver Island Enterprises (VIE) operations that consist of Sorting of Soils and Gravel as well as Processing of Compost currently operating at 1200 Military Row, an abutting property. The property is currently zoned Light Industrial (E-3) which (per discussions between the client and Town staff) does not permit the proposed uses. Therefore, a Comprehensive Development Zone has been drafted as the proposed new zone.

Context and Location

The subject property is situated in Northeast of Comox in close proximity to the Comox Valley Airport and Department of National Defence (DND) lands. The majority of nearby properties not within DND lands are intended for industrial uses with residential lands to the south.

Figure 1: Subject Property



The subject property has the following charges on Title, which after thorough review, are neither affecting nor affected by the proposed development on the lot.

Charge	Purpose of Charge
110862G	Continued permission to access lands and remove buildings, vegetation or structures that obstruct the flight path.
1425OS	Expropriation of land for the purposes of the flight path approach.
CA2603295	Telus telecommunications site SRW (access, maintenance, etc).
CA3935638	Rogers SRW for the operation and maintenance of utilities and associated infrastructure.

Official Community Plan Review

Land Use Policies

The land use designation for the subject property is Business Park, which is intended to provide employment to support the operation of the Comox Valley Airport and 19 Wing Comox while providing light industrial uses and limited commercial uses for local job opportunities.

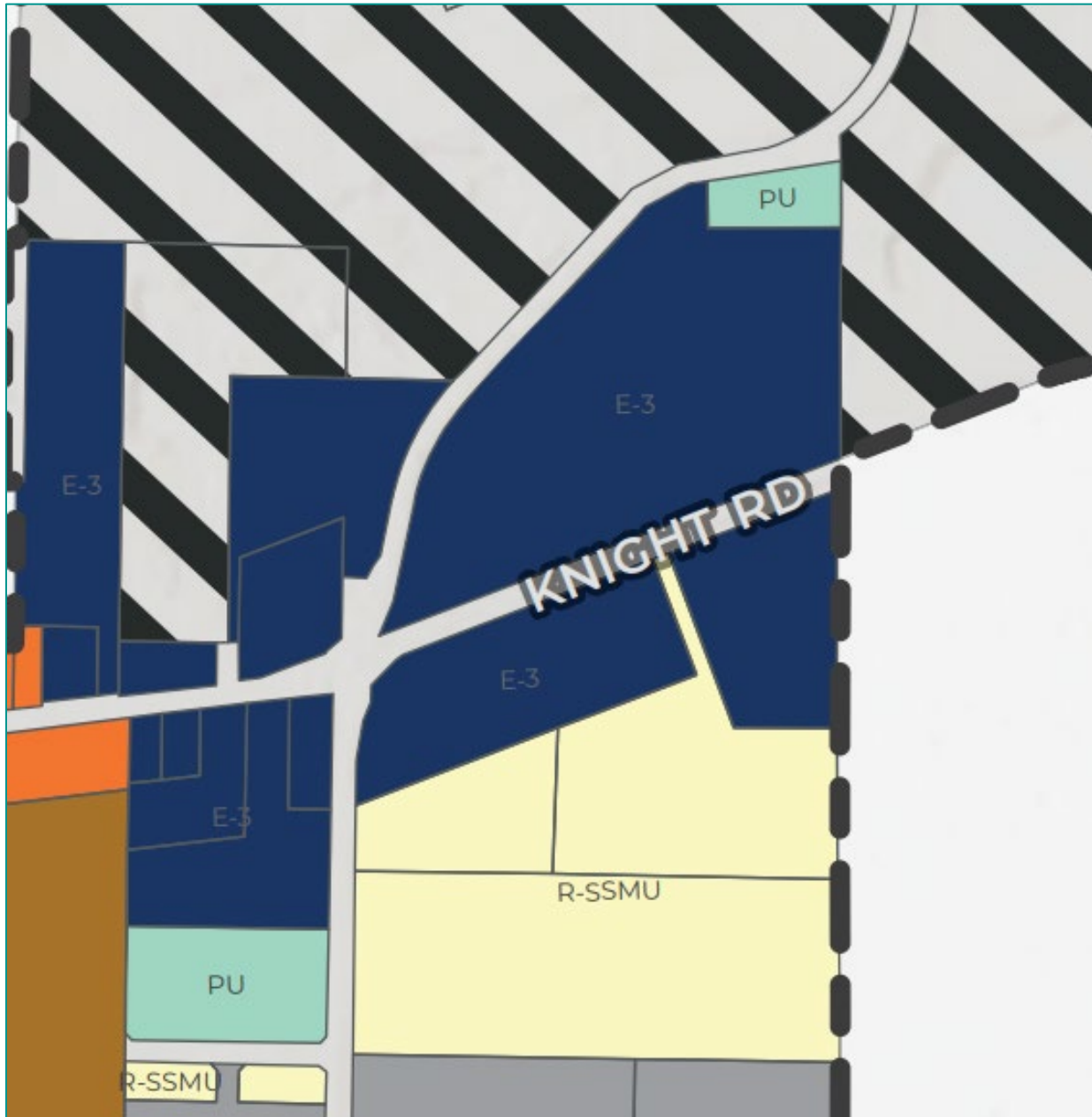
Development Permit Areas

The zoning amendment proposal does not include the subdivision of land, alteration of land, including vegetation, or the construction of, addition to, or alteration of a building or structure. It is therefore our understanding that a Development Permit is not required prior to this proposed Rezoning. It is acknowledged that the proposed development of the Subject Property will require Development Permit(s), applications for which have been submitted independently of this application.

Zoning Bylaw Review

As per the *Town of Comox's Zoning Bylaw 2056, 2025*, the parcel falls within the Light Industrial (E-3) zone. The parcel is near the Town's remaining E-3 zoned properties, while to the south the property abuts Residentially zoned lots and CVRD lands to the east.

Figure 2: Zoning Context



Proposed Zoning Amendment – New CD Zone

A new comprehensive development zone has been drafted to reflect the uses proposed for the Subject Property, while taking into account adjacent sites and their land uses under the Town's Zoning Bylaw.

Table 1: Zoning Bylaw Comparison Table

	Light Industrial (E-3)	CD27 – 1301 Knight Road
Zone Intent	This zone is intended to designate and preserve land for light industrial development adjacent to the Comox Valley Airport.	This zone is intended for the operation of material processing including sand, gravel, rocks, and other organic materials.
Permitted Uses	<ul style="list-style-type: none"> 1) Principal <ul style="list-style-type: none"> a. Accommodation, Hotel b. Airport c. Automotive and Equipment Services, Light d. Automotive and Equipment Services, Heavy e. Gas Station f. Industrial, Light g. Production Facility, Alcohol h. Production Facility, Cannabis i. Recycling Facility j. Veterinary Services, Major k. Veterinary Services, Minor l. Watercraft and Equipment Services 2) Secondary <ul style="list-style-type: none"> a. Accessory Structures b. Caretaker Suite c. Care Facility, Child d. Education Services e. Fleet Services Facility f. Food Services g. Mobile Vending h. Parking Lot i. Professional Services, Internal-Facing j. Professional Services, Public-Facing k. Storage, Outdoor l. Wholesale Services 	<ul style="list-style-type: none"> 1) In the CD27 zone, the following primary uses are permitted, and all other uses are prohibited: <ul style="list-style-type: none"> a. Sorting of Soils and Gravel b. Processing of Compost 2) In the CD27 zone, the following secondary uses are permitted, and all other uses are prohibited: <ul style="list-style-type: none"> a. Accessory Structures b. Automotive and Equipment Services, Light c. Automotive and Equipment Services, Heavy d. Caretaker Suite e. Fleet Services Facility f. Parking Lot g. Plant Nursery h. Retail Sales i. Storage Facility, Warehouse j. Storage, Outdoor k. Wholesale Services

<p>Permitted Uses – Conditions</p>	<ol style="list-style-type: none"> 1) Motel accommodation is permitted as a principal use on the lot legally described as Lot A, Section 1, Comox District, Plan VIP63902 Except Plan EPP123005 (2082 Comox Avenue). 2) One caretaker suite shall be permitted as a secondary use on the lot legally described as Lot A, Section 1, Comox District, Plan VIP63902 (2082 Comox Avenue). 3) Drive-through services are permitted as a secondary use, up to a maximum of two drive-through services establishments per lot, on the lots legally described as: <ol style="list-style-type: none"> a. Lot A, District Lot 170, Comox District, Plan VIP67445 (727 Anderton Road); and b. Lot A, Section 77, Comox District, Plan VIP86498 (1966 Guthrie Road). 4) Outdoor storage is permitted as a secondary use on the lots legally described as: <ul style="list-style-type: none"> • Lot 1, Section 70, Comox District, Plan VIP53357 (528 Anderton Road); <ol style="list-style-type: none"> a. That Part of Section 70, Comox District, Shown on Plan VIP56874 (528 Anderton Road); and b. Lot A (DD EF138928), Section 70, Comox District, Plan VIP51941 (554 Anderton Road). 	<p>N/A</p>
<p>Subdivision Standards</p>	<ol style="list-style-type: none"> 1) Minimum Lot Area <ol style="list-style-type: none"> a. 2,000 m² 2) Minimum Lot Width <ol style="list-style-type: none"> a. 30.0 m 	<ol style="list-style-type: none"> 1) Minimum Lot Area <ol style="list-style-type: none"> a. 2,000 m² 2) Minimum Lot Width <ol style="list-style-type: none"> a. 30.0 m
<p>General Regulations</p>	<ol style="list-style-type: none"> 1) Maximum Lot Coverage <ol style="list-style-type: none"> a. 60 % 2) Maximum Lot Coverage Including Impervious Surfaces <ol style="list-style-type: none"> a. 80 % 3) Maximum Number of Dwelling Units <ol style="list-style-type: none"> a. 1 per building 	<ol style="list-style-type: none"> 1) Maximum Lot Coverage <ol style="list-style-type: none"> a. 40 % 2) Maximum Lot Coverage Including Impervious Surfaces <ol style="list-style-type: none"> a. 60 % 3) Maximum Number of Dwelling Units <ol style="list-style-type: none"> a. 1 per lot
<p>General Regulations – Conditions</p>	<ol style="list-style-type: none"> 1) Dwelling units shall only be permitted in the form of a caretaker suite. 	<p>N/A</p>

<p>Development Standards – Principal & Secondary</p>	<ul style="list-style-type: none"> 1) Maximum Height <ul style="list-style-type: none"> a. 10.0 m 2) Minimum Front Setback <ul style="list-style-type: none"> a. 3.0 m 3) Minimum Rear Setback <ul style="list-style-type: none"> a. abutting a lot in a Low-Density Residential or Multi-Unit Residential zone <ul style="list-style-type: none"> i. 7.5 m b. abutting a lot in any other zone <ul style="list-style-type: none"> i. 3.0 m 4) Minimum Side Setback <ul style="list-style-type: none"> a. abutting a lot in a Low-Density Residential or Multi-Unit Residential zone <ul style="list-style-type: none"> i. 7.5 m b. abutting a lot in any other zone <ul style="list-style-type: none"> i. 3.0 m 5) Minimum Exterior Side Setback <ul style="list-style-type: none"> a. 3.0 m 6) Minimum Corner Cut-Off Setback <ul style="list-style-type: none"> a. 1.0 m 	<ul style="list-style-type: none"> 1) Maximum Height <ul style="list-style-type: none"> a. 10.0 m 2) Minimum Front Setback <ul style="list-style-type: none"> a. 3.0 m 3) Minimum Rear Setback <ul style="list-style-type: none"> a. abutting a lot in a Low-Density Residential or Multi-Unit Residential zone <ul style="list-style-type: none"> i. 7.5 m b. abutting a lot in any other zone <ul style="list-style-type: none"> i. 7.5 m 4) Minimum Side Setback <ul style="list-style-type: none"> a. abutting a lot in a Low-Density Residential or Multi-Unit Residential zone <ul style="list-style-type: none"> i. 7.5 m b. abutting a lot in any other zone <ul style="list-style-type: none"> i. 7.5 m 5) Minimum Exterior Side Setback <ul style="list-style-type: none"> a. 3.0 m 6) Minimum Corner Cut-Off Setback <ul style="list-style-type: none"> a. 1.0 m 7) Minimum Setback from ALR <ul style="list-style-type: none"> a. 8.0 m <ul style="list-style-type: none"> i. Regardless of section 5.3.2(6), the setback must be vegetative or otherwise landscaped, to serve as a landscape buffer.
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<p>Development Standards (Accessory)</p>	<ol style="list-style-type: none"> 1) Maximum Height <ol style="list-style-type: none"> a. 10.0 m 2) Minimum Front Setback <ol style="list-style-type: none"> a. 3.0 m 3) Minimum Rear Setback <ol style="list-style-type: none"> a. 3.0 m 4) Minimum Side Setback <ol style="list-style-type: none"> a. 3.0 m 5) Minimum Exterior Side Setback <ol style="list-style-type: none"> a. 3.0 m 6) Minimum Corner Cut-Off Setback <ol style="list-style-type: none"> a. 1.0 m 	<ol style="list-style-type: none"> 1) Maximum Height <ol style="list-style-type: none"> a. 10.0 m 2) Minimum Front Setback <ol style="list-style-type: none"> a. 3.0 m 3) Minimum Rear Setback <ol style="list-style-type: none"> a. 3.0 m 4) Minimum Side Setback <ol style="list-style-type: none"> a. 3.0 m 5) Minimum Exterior Side Setback <ol style="list-style-type: none"> a. 3.0 m 6) Minimum Corner Cut-Off Setback <ol style="list-style-type: none"> a. 1.0 m
<p>Development Standards – Conditions of Use</p>	<p>N/A</p>	<ol style="list-style-type: none"> 1) 'Sorting of Soils and Gravel' and 'Processing of Compost' uses are permitted as a principal uses only on the lot legally described as LOT D, DISTRICT LOT 217, COMOX DISTRICT, PLAN 47754 [1301 Knight Rd]. 2) 'Sorting of Soils and Gravel' and 'Processing of Compost' uses are permitted as a principal uses only on the lot legally described as LOT D, DISTRICT LOT 217, COMOX DISTRICT, PLAN 47754 [1301 Knight Rd]. 3) Retail sales of only soils, gravel and compost is permitted as a secondary use to 'Sorting of Soils and Gravel' and 'Processing of Compost' and may be located outside of a building. 4) Storage Facility, Warehouse is permitted as a secondary use to 'Sorting of Soils and Gravel' and 'Processing of Compost'. 5) Outdoor storage of only soils, gravel and compost is permitted as a secondary use to retail sales and wholesale service on the lot legally described as LOT D, DISTRICT LOT 217, COMOX DISTRICT, PLAN 47754 [1301 Knight Rd] 6) Wholesale services of only soils, gravel and compost is permitted as a secondary use to 'Sorting of Soils and Gravel' and 'Processing of Compost' and may be located outside of a building. 7) Despite its definition in this Bylaw, if a Caretaker Suite is proposed on site, a single-family household is permitted to occupy this dwelling.

In addition to the proposed CD Zone, to facilitate this proposed Rezoning, it is proposed that the following definitions be added to the Zoning Bylaw:

Sorting of Soils and Gravel – means the use of lands, buildings or structures for the moving, crushing, washing, screening, processing or storage of soils, sands, bark mulch, and other soil or other composted materials. This also includes the storage and sales of materials such as gravel or rocks.

Processing of Compost – means the use of lands, buildings or structures for the processing or storage of compost and compostable materials and includes operation of screeners and grinders in unenclosed spaces.

Project Summary

The proposed rezoning of 1301 Knight Road to the new comprehensive development zone facilitates the relocation of VIE to the Subject Property, while respecting surrounding properties and their approved land uses.

It is our evaluation that the proposal is suitable for the Subject Property as the operations already exist in the vicinity and the rezoning is necessary to facilitate the operation of VIE.

We look forward to continuing to work with the Town to continue supporting sustainable development in the community.

Thank you in advance for considering our proposal.

Thank You

For considering our proposal.



McElhanney

