

**REPORT TO PLANNING AND PROTECTIVE SERVICES COMMITTEE
MEETING OF WEDNESDAY, SEPTEMBER 17, 2025**

SUBJECT **Regional Context Statement Alignment Review – District of North Saanich**

ISSUE SUMMARY

To review the District of North Saanich Regional Context Statement (RCS) in relation to the Capital Regional District's (CRD) Regional Growth Strategy (RGS) Bylaw (Bylaw No. 4017).

BACKGROUND

The RGS is a vision for the future of the capital region, guiding decisions on regional issues such as transportation, population growth and settlement patterns. The RGS promotes the long-term livability of the region with policy intended to enhance social, economic and environmental performance. The current RGS was adopted by the CRD Board on March 14, 2018 (Bylaw No. 4017). On April 14, 2021, the CRD Board amended the RGS with updated population projections (Bylaw No. 4328).

An RCS, adopted within a local government's Official Community Plan (OCP), sets out the relationship between the RGS and OCP and how they will be made compatible over time. Per section 446 of the *Local Government Act (LGA)*, an OCP in a local government to which an RGS applies must include an accepted RCS. The *LGA* stipulates that upon receipt of a proposed RCS, the CRD Board must respond by resolution within 120 days to the municipal council to indicate whether or not it accepts the RCS. The Board is deemed to have accepted the RCS if it does not respond within the 120-day period.

On April 11, 2018, the CRD Board approved a framework to guide the evaluation of regional context statements.

On June 18, 2025, the District of North Saanich submitted an updated RCS for Board acceptance (see Appendix A). The RCS was prepared as part of the district's update to the District of North Saanich's Official Community Plan (Bylaw No. 1587) and adoption of an updated Housing Needs Report. The CRD Board accepted the District of North Saanich's previous RCS on December 11, 2019.

Regional Planning staff have evaluated the updated RCS in accordance with the Board-approved Regional Context Statement Framework. This framework identifies three criteria against which staff should evaluate a RCS:

- 1) **All relevant content is included:** The RCS addresses all RGS content relevant to the OCP. Content that is not applicable in the context of the OCP should be identified as "not applicable".
- 2) **Clearly articulates relevant content:** The RCS provides a sufficient level of detail to convey how the specific OCP content relates to the RGS.
- 3) **Plan to be consistent over time:** The RCS identifies how the OCP will become consistent with the RGS over time, if content is not immediately consistent.

Appendix D presents a summary of the evaluation.

Reviewing the Regional Context Statement (RCS)

Overall, the majority of the District of North Saanich's RCS is well aligned with RGS objectives. The RCS includes relevant content relating to RGS objectives for environment and infrastructure, housing and community, transportation, economic development, food and agriculture and climate action.

However, the RCS section related to RGS Objectives for Managing and Balancing Growth (Objectives 1.1 and 1.2), does not address an inconsistency between the OCP's Land Use Designations and the RGS Growth Management Concept (Map 3a) and associated policies.

Urban Growth Outside of the Urban Containment Policy Area (UCPA)

The District of North Saanich's OCP includes "Multi-family Residential" and "Future Growth Area" land use designations. These designations are inconsistent with RGS policies 1.1(1) and 1.2(1) which state that land uses should be consistent with the RGS Growth Management Concept Plan and land use policy designations, notably that Rural/Rural Residential lands are not intended to become future urban areas or require extensive services. Multi-unit housing does not align with the rural form, density, and character contemplated under the RGS.

The proposed land uses would represent urban style growth in areas outside of the UCPA. The above noted RGS policies, as well as the UCPA and Rural/Rural Residential Policy Area are core policies of the RGS and the foundation of the settlement and growth concept within the CRD. Within the RGS's Rural/Rural Residential Policy Area, the expected form of development is intended to support septic services rather than municipal sewer services. Policy 1.2(1) notes the avoidance of creating future urban areas in the Rural/Rural Residential Policy Area.

Under the OCP, the Multi-family Residential land use designation contemplates development with a maximum floor area ratio (FAR) of 0.8 to a maximum of 40 units/acre, up to 3 stories, with consideration for 4 stories for seniors housing. The purpose of the Future Growth Areas designation is to meet additional growth demand beyond that identified in the OCP and is to be reviewed for densification in alignment with the 5-year Housing Needs Assessment Update process.

Achieving Alignment

It is important to note that, from a municipal planning perspective, the land-use concept and land use designations within the District of North Saanich's OCP are reasonable policy directions based on recent provincial housing legislation, policy and targets. They work towards the overall goals of the RGS, in particular, increasing density around the McTavish Transit Exchange which is aligned with provincial and RGS goals to locate new urban growth in proximity to transit.

While these land use designations would be appropriate within the UCPA, they are not aligned with the Rural/Rural Residential RGS designation that exists outside of the UCPA. Therefore, rather than seeking to change the proposed RCS/OCP to align with the RGS, alignment could be reached by amending the RGS to adjust the boundary of the UCPA and thus supporting the District of North Saanich's plans for future growth. With Board approval, this could be done as a minor RGS amendment.

Acceptance / Refusal Under the *Local Government Act*

In reviewing a proposed RCS for alignment with the RGS, section 448(2) the *LGA* provides for only two options: to accept an RCS, or to refuse to accept. This review must be based on the current in-force RGS. The *LGA* does not allow for a conditional approval pending the completion of an RGS amendment.

The legislation allows for 120 days from the referral of the RCS for the CRD to respond. If a response is not given within that timeframe, the CRD is deemed to have accepted the proposed RCS. The District of North Saanich referred the RCS on June 18, 2025, which means that the deadline for the CRD to respond is October 16, 2025.

Given that an RGS amendment would require longer than this 120-day period to be completed, the RCS can only be judged in relation to the current RGS, and not in relation to a potential amendment that has yet to be adopted.

ALTERNATIVES

Alternative 1

The Planning and Protective Services Committee recommends to the Capital Regional District Board:

1. That the District of North Saanich Regional Context Statement be considered in relation to the 2018 Regional Growth Strategy (RGS) (Bylaw No. 4017) in accordance with the requirements of section 448 of the *Local Government Act* and not be accepted due to inconsistency with the growth management concept plan of the RGS and related policies; and
2. That the matter be referred to the District of North Saanich for direction on how to proceed.

Alternative 2

That the District of North Saanich Regional Context Statement (RCS) report be referred to staff for additional information based on Planning and Protective Services Committee direction. And that, due to the response time requirements of section 448 of the *Local Government Act*, that the RCS and additional information be brought forward directly to the Board for consideration.

IMPLICATIONS

Intergovernmental Implications

CRD Board acceptance of the RCS is a key RGS implementation tool as the context statement relates a local government's OCP to the RGS. The OCP provides policies that guide decisions related to land use, infrastructure, mobility, housing, parks and other content under the authority of a local government. The District of North Saanich has submitted a proposed RCS to fulfill its statutory obligation to have an accepted RCS that demonstrates the relationship of its new OCP to the RGS. An accepted RCS is necessary for the adoption of an updated OCP.

Regional Growth Strategy Implications

The UCPA is a core policy of the RGS, and a foundation of the regional vision for growth. It is the primary implementation tool to achieve the RGS's objectives, including *keeping urban settlement compact, protecting the integrity of rural communities, the creation of safe and complete communities, and the delivery of services consistent with RGS objectives*.

The following table highlights the sections of the RGS that are relevant to the misalignment of the District of North Saanich's RCS resulting from the designation of areas of urban growth outside of the UCPA.

RGS 1.1	Pg 11	The aim of keeping urban settlement compact is to concentrate growth within a firm Urban Containment Policy Area Boundary that will over time result in the creation of centres and connecting corridors that can be effectively served by express-bus transit.
RGS UCPA Definition	Pg 13	The Regional Growth Strategy restricts extension of urban–standard sanitary sewerage services beyond the Urban Containment Policy Area Boundary as set out under policy 2.2(5).
RGS Rural/Rural Residential Definition	Pg 13	The Regional Growth Strategy sets out in policy 1.1(1) and 1.2(1) that Rural/Rural Residential lands are not intended to become future urban areas requiring extensive services. Residential uses are of a form, density and character that support rural working landscapes.
RGS 1.1.1	Pg 21	Provide for land uses consistent with the Growth Management Concept Plan depicted on Map 3(a) and adopt policies to implement the Growth Management Concept Plan consistent with the land use policy designations described in Objective 1.1.
RGS 1.1.3	Pg 21	Permit amendment to the Urban Containment Policy Area designation generally, only as an outcome of a comprehensive 5-year review of the Regional Growth Strategy, recognizing that municipal councils and the Capital Regional District Board are free to initiate at any time amendments to official community plans and the regional growth strategy they deem necessary, through statutory processes established in the <i>Local Government Act</i> .
RGS 1.2 Policy 1	Pg 22	Avoid the creation of future urban areas through development patterns that complement rural form, density and character.
RGS 1.2.1	Pg 22	Plan for development in the Rural/Rural Residential Policy Area depicted on Map 3(a) in a manner that is consistent with the principles set out in Objective 1.2.
RGS 2.2.5	Pg 27	Do not further extend urban sewer services outside the Urban Containment Policy Area Boundary depicted on Map 3(a).

Environmental & Climate Implications

The CRD Climate Action Strategy identifies sustainable land use, planning and preparedness as an important goal area to reduce greenhouse gas (GHG) emissions. RGS implementation, including the approval of RCSs that will help reduce community-based GHG emissions, is a key action. As shown in Appendix B, the District of North Saanich’s RCS shows alignment with the RGS objectives for environment and infrastructure, food systems, and climate action.

Alignment with Board & Corporate Priorities

Reviewing RCSs for consistency addresses the Planning Community Need from the 2023-2026 CRD Corporate Plan goal 8a for managed growth. The RCS review is an on-going initiative, which is part of Regional Planning’s core service delivery.

Alignment with Existing Plans & Strategies

The District of North Saanich’s RCS is largely aligned with existing CRD plans and strategies and details and enacts six of the seven primary objectives of the RGS. The issue of misalignment with RGS Objectives 1.1 and 1.2 on Managing and Balancing Growth, including the above noted policy, is the focus of this report.

CONCLUSION

Provincial legislation requires that a municipal OCP contains an accepted RCS. Board acceptance of the RCS is a key tool for RGS implementation. Staff have reviewed the District of North Saanich's proposed RCS in accordance with the Board-approved evaluation framework.

The proposed RCS is not aligned with the current RGS, specifically regarding the Rural/Rural-Residential Policy Areas and the UCPA. Alignment can be achieved by initiating an RGS amendment to adjust the UCPA boundary to support the RCS/OCP designations for multi-family residential and future growth areas.

RECOMMENDATION

The Planning and Protective Services Committee recommends to the Capital Regional District Board:

1. That the District of North Saanich Regional Context Statement be considered in relation to the 2018 Regional Growth Strategy (RGS) (Bylaw No. 4017) in accordance with the requirements of section 448 of the *Local Government Act* and not be accepted due to inconsistency with the growth management concept plan of the RGS and related policies; and
2. That the matter be referred to the District of North Saanich for direction on how to proceed.

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ATTACHMENTS

- Appendix A: District of North Saanich Referral Letter
- Appendix B: North Saanich Regional Context Statement
- Appendix C: Reference Maps
- Appendix D: Regional Context Statement Evaluation