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**To:** [Campbell, Dwayne](#)  
**Cc:** ["Jane Zednik"](#)  
**Subject:** Northumberland County Draft Official Plan Growth Plan Amendment - Comments  
**Date:** Thursday, May 16, 2024 9:07:48 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Re: [Feedback to planned amendments to the Northumberland County Official Plan Growth Plan Amendment](#)

This is to register concerns over this proposed amendment on page 10:

- c) *Where municipal sewage services and municipal water services are not provided, planned or feasible, ~~municipalities may allow the use of private communal sewage services and private communal water services~~ are the preferred form of servicing for multi-unit/lot development to support protection of the environment and minimize potential risks to human health and safety.*

The phrase to be eliminated "*Municipalities **may** allow*" provides municipalities like Port Hope control over rural development. This change from "**may**" to "**preferred**" removes municipal control.

The PPS also uses the word "**may**" .... not "**preferred**"

*1.6.6.3 Where **may** allow the use of private communal sewage services and private communal water services*

The word "**may**" allows for decisions to be made by the municipality *if* communal services will be allowed as well as the number of users allowed to utilize permitted communal water and sewage systems. The change to the word '*preferred*' indicates there might be no restrictions or limitations on how many residential/commercial/industrial/institutional units will be allowed to share communal water and sewage services in rural areas.

Please provide the data/scientific evidence that supports the amended statement that private control of both communal wells and sewage systems will "*support protection of the environment and minimize potential risks to human health and safety*".

Port Hope has exercised its discretion in its Official Plan based on existent wording in B9 (section C) in the Northumberland County Plan with the word "may". The Port Hope Official Plan states on page 65:

**"Communal water supply and/or sewage disposal systems shall not be permitted anywhere in the Municipality."**

Port Hope also recently passed adopted this resolution : ***that unequivocally states a municipal position that Port Hope will not contemplate a private water or wastewater treatment system requiring a Municipal Responsibility Agreement***

<https://pub-porthope.escribemeetings.com/filestream.ashx?DocumentId=11033>

If this amendment is adopted, will Northumberland County then be responsible for Municipal Responsibility

Agreements (MRAs) which requires private operators to provide one hundred percent of the cost of the proposed communal servicing system as a security to protect against the risk of the system’s failure as well as financing lifecycle costs? Will the County, in the event of default by the owner-operator of the system, then take on the financial burden of what might be countless communal systems?

There are no specific regulations/restrictions/directives in the Official Plan amendment addressing ‘preferred’ private control over communal wells and sewage systems with regard to the financial considerations for operations and maintenance costs; rehabilitation costs; eventual capital replacement costs; insurance costs; and catastrophe costs related to unplanned and unexpected major expenses not covered by insurance. Will Northumberland County assume ownership/operation for private communal sewage and/or water services should the operator fail to operate or maintain the system according to any agreement ?

Item 16 re-numbered as Section B9 d is also confusing. Section d states where municipal services or private communal services previously are not available in rural settlement areas then individual services can be used. Now ‘rural settlement’ has been removed. So.. where are the ‘preferred’ private communal services allowed since the amendment also states that in rural settlement areas “individual on-site sewage services and individual on-site water services may only be used for infilling and minor rounding out of existing development”

**Item 16: Former Section B14 (Servicing in Rural Settlement Areas) is re-numbered as Section B9 d) and e) and is amended as per below:**

*"d) Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible ~~provided in a rural settlement area~~ individual on-site sewage services and individual on-site water services may be used provided*

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*that site conditions are suitable for the long-term provision of such services with no negative impacts. In rural settlement areas, individual on-site sewage services and individual on-site water services ~~these services~~ may only be used for infilling and minor rounding out of existing development.*

I look forward to your response.

Jane Zednik  
