

Mr. Dwayne Campbell
Director of Planning
Northumberland County

May 24, 2024

Dear Mr. Campbell.

RE Growth Management Future Official Plan Amendment- Publication Consultation.

I attended the Public Open House yesterday afternoon and listened to the presentation at 4:30 but was not able to stay for all the follow up questions. I am writing today, to outline some initial thoughts on the proposed Growth Plan, as it may have a big impact on residents of the Town of Port Hope where I have been living for the past 20 years.

Let me begin by saying that in my former professional life, I was working for the Federal, and Provincial governments and the Toronto Region Conservation Authority. I had been involved in urban growth management studies for over 40+ years; principally in terms of their environmental design, watershed perspectives and infrastructure considerations related to transportation and servicing studies. I directed between 2000 and 2019, the development of four watershed plans for the TRCA. I have extensively studied the nearshores of Lake Ontario, with respect to nearshore water quality impacts of nutrient loadings from watersheds. I also served as a Canadian Advisor to the Great Lakes Fisheries Commission for two years prior to retirement in 2019. In addition I was an advisor to CIDA in the late 1990s transferring Canadian Expertise in Watershed Management to the State of Sao Paulo, Brazil.

The following points summarize my initial review.

1. It is totally inappropriate to assign all the major growth to the Town of Port Hope. The excuse that Cobourg is built out and the growth needs to be west focused is not a logical statement as your consultant made it sound in the meeting. To begin, the old municipal boundary of Port Hope is equally as built out as Cobourg, under the current OP. The opportunity to advance urban boundary outside of Ward1 exists only because the former Harris government forced the amalgamation of Hope Township with the Town of Port Hope. Hamilton Twp for some unknown reason was able to escape being amalgamation with Cobourg. At the time of amalgamation in Port Hope most of the infrastructure needed for future urban growth was positioned in Cobourg- (County Planning Services, Hospitals, OPP, Court Houses etc.) Big box retail all moved to Cobourg. If pressed I am certain the current provincial government would support boundary changes to Hamilton Township bringing new lands for urban growth into the Town of Cobourg.
2. The designation of the block of future urban land depicted on the schedule map sent to my house makes no sense to me. Your consultant said at the public meeting no one would want to see growth north of the 401. That statement is simply wrong. One only has to look further west and you can see that Newcastle, Bowmanville, Courtice, Oshawa, Whitby,

Ajax and Pickering all utilize lands north of the 401 for their urban expansion. The lands depicted for the western urban expansion of Port Hope pose challenges in terms of local road networks :with only two east west roads available to convey more subdivision traffic (Marsh Road and Lakeshore Road). There are no logical routes for future roads that pass through the Rapley subdivision, in an East West direction. Your consultant also cited the nuclear waste management site as a constraint. He failed to mention the existence the Whites subdivision, immediately adjacent to this site and housing along the entrance on Toronto Road. Servicing of the proposed site will be costly as there will be a requirement to collect and pump sewage across the Ganaraska River to Sewage Plant vs. the use of gravity flow networks if the lands north of the 401 were used for development.

3. Providing options for public consultation is a good thing. I need to read more of the background documents or earlier reports, but typically growth management planning efforts present several areas within a municipality for future growth. Why is there not some pressure on the province to develop lands they already own in the Wesleyville area? The key point is this reduces the need to remove any class 1 agricultural lands and takes the cost of planning and servicing growth off the plate of Town of Port Hope taxpayers. These lands are much closer to GTA which the planning consultant used as his rationale supporting the parcel of land depicted in the attached schedule.
4. Lands North of the 401 to the west of the Ganaraska river offer less impacts on prime agricultural lands and provide a clean slate for innovative and sustainable urban planning of neighbourhoods, transit friendly road networks, green spaces and supporting amenities such as retail and community centres. You could save money by linking lands to west of Highway 28 with servicing of the employment lands east of Hwy 28 , and north of the 401. Town water was recently delivered to Welcome and there is municipal land already purchased suitable for a new community centre and or elementary school.
5. Planning of urban expansion in the Town of Port Hope will need strong Provincial commitment that the future widening of the 401 and planned bridge replacements will also consider the transportation connections needed to support commuters getting safely on and off the 401. Let's not create the transportation mess that exists in Bowmanville and Newcastle all over again. Expanded parking will be required at the VIA train station and there is a need for a Go Bus station in Port Hope.
6. My last concern is who pays for all this development? Should these cost not be shared across Northumberland County if 100% of the growth the county needs to provide is being focused on the municipality (Port Hope). Development Charges fees as you are well aware, are increasingly subject to new funding formulas established by the province. With the logic of making new homes more affordable – in fact there are no actual savings with the true costs now downloaded to municipal tax bills.

7. Growth is very much needed, and I recognize that it is something apposed by many residents. For the record I fully support urban growth, but only for growth on lands best suited and the most cost effective for servicing and allowing a clean slate for innovative planning by the Town of Port Hope.

In closing I look forward to receiving a detailed response to this correspondence.

Gary Bowen

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
July 7, 2024

Mr Dwayne Campbell, MCIP, RPP
A/Director of Planning and Economic Development
555 Courthouse Road
Cobourg, ON K9A 5J6

Re: AMENDMENT NO. 2 TO THE OFFICIAL PLAN FOR NORTHUMBERLAND COUNTY

Dear Dwayne:

Thank you for your informative presentation at the recent Port Hope information session. It has provided us with a better understanding of the objectives and processes involved in amending the Official Plan.

We now believe we have a good grasp of why the Amendment is being proposed as well as the competing interests and powers that must be accommodated. This is certainly compounded by the challenge of making meaningful forecasts in the face of numerous uncertainties.

Below are our comments.

1. The proposal bases its conclusion on the rather simplistic and questionable approach of using the status quo of population allocation as the foundation for projections
2. It imposes artificial limitations by including the perspective that current population and land use proportions must be maintained.
3. These result in a potentially flawed underpinning for future projections.
4. This leads to the dubious conclusion that the Primary Study Area (PSA) is optimal

Firstly, we are aware that our property at [REDACTED] lies within the Secondary Study Area (SSA) as described in the Agricultural Impact Study (AIS). It has the potential to be affected as outlined in the study. Secondly, we believe that removing prime agricultural land without a thorough exploration of alternatives is short-sighted and reckless.

Flaws in the base assumption:

The irreversible nature of removing land from agricultural use is a sobering reality. As the SSA states, "...there will be a permanent loss of agricultural land on the PSA lands." Once it's gone, it's gone forever. Therefore the process that determines whether land ideal for its current use should be repurposed deserves rigorous scrutiny. Many would agree that such decisions should be approached with extreme caution.

However, we judge that the current process, despite appearing to be a careful study, has significant weaknesses that could distort or mislead the outcomes. The most obvious major flaw is the reliance on status quo data as the basis for projections which may lead to less than optimal conclusions.

While it is true that projections are rarely precise, starting from the status quo may seem as reasonable as any other basis. However, assuming its continued validity oversimplifies the complex dynamics at play. It's crucial to ask why the status quo is assumed to be valid and what alternative metrics or scenarios could lead to vastly different outcomes. The absence of a comprehensive assessment of future forces that could impact land use, such as the potential construction of a Toronto-Montreal High-Speed rail in Northumberland to name one, is concerning.

Flaws in location assumption:

Further flaws arise from the position that prioritizes equitable land use among jurisdictions in the county over finding the optimal location that balances agricultural preservation with other uses. Assertions that physical barriers like the 401 or municipal boundaries restrict development are questionable. For instance, existing services that follow county roads 10 and 28 across 401 suggest that such barriers may not be as limiting as claimed. Why are they cited as constraints for one type of development but not others such as the proposed Employment Lands?

The PSA's selection as the sole candidate under these constraints may create the impression of an exercise designed to justify a predetermined conclusion.

Finally:

Recognizing that the current process may limit exploration of alternatives, we propose reframing the question from "Where are the best 131 hectares contiguous to urban Port Hope?" to "Where are the best 131 hectares in all of Northumberland county?" This broader approach could identify a more suitable area to meet the region's needs.

Furthermore, including the findings of the currently in process analysis by the Town of Port Hope of land use within the urban area may also reveal other options.

We trust the above provides a useful perspective and encourages you to reassess the assumptions used to identify the PSA lands as a suitable candidate for non-agricultural development.

Should you wish to speak with us about any of the above, please contact us at the phone numbers below.

Yours truly,

[Redacted signature]

Alexandra Brown

[Redacted contact information]

[Redacted signature]

Ronald Estey

[Redacted contact information]

c.c. Ms. Olena Hankivsky, Mayor, Port Hope
Mr. Todd David, Director of Planning, Port Hope

From: [Sandra Buttell](#)
To: [Campbell, Dwayne](#)
Subject: Growth Management.
Date: Monday, May 27, 2024 7:22:59 PM

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Good afternoon Dwayne,

Thank you for providing the recent Open House and presentation in Cobourg on May 23, 2024.

I am the retired owner of an engineering company, who has lived in Pickering for 30 years, before moving to Port Hope in 2013.

I have zero knowledge of the County's Official Plan and the amendment processes, but after receiving your information flyer and map of the Port Hope proposal in the mail a number of potential concerns immediately occurred to me.

1. The Amendment provides no alternatives for Port Hope Council to consider - surely alternative development areas with their appropriate pros/cons must be provided for such an important decision that will shape the Town of Port Hope forever?
2. It was stated that residential development north of Hwy 401 in PH was rejected due to concerns that any new subdivisions would be isolated. I do not believe that this statement holds water after living south of Hwy 401 for 30 years in Pickering! Not once did I ever think that my development was isolated from downtown Pickering and Hwy 2. I believe that this 401 development separation has also been successfully achieved in Ajax, Whitby, Oshawa and Newcastle without any issues.
3. A residential development option north of Hwy 401 in PH, between Toronto Rd and Choate Rd and extending north towards Welcome would seem a viable option and maybe provide some benefits in reducing the amount of prime farming land that would be lost to development;
 - Large areas of land in this section appear to be un-farmed scrub land.
 - Easy access/egress to Hwy 401 for commuters.
 - Easy access/egress to downtown PH (via Toronto Rd or Cranberry Rd/Victoria St. N.)
 - Minimal requirement for removal of old growth woods/trees.
4. Regarding the current proposal to develop the west side of PH for housing;
 - Access/egress to Hwy 401 for commuters will drive traffic into existing developments and could cause severe bottlenecks on Toronto Rd, Lakeshore Rd & Marsh Rd.
 - Traffic volume on Lakeshore Rd would be greatly increased and could result in problems for the Hamlet of Port Britain.
 - Traffic volume on the Waterfront Trail (Lakeshore Rd) could increase to an unacceptable volume with resultant safety concerns for cyclists, hikers, etc..
 - Large areas of existing woodland would need to be removed south of Marsh Rd.
 - Significant areas of this proposed development area would be lost due to the required set-backs from the CP Rail tracks due to noise/vibration/safety.

I would appreciate it if you could provide me with the email address of the appropriate members of PH Council who will be addressing the GMA in September.

I would like to send a copy of this message to these members of Council.

Thank you for organizing the upcoming open house in Port Hope, as the proposed Amendment impacts the town greatly. I hope you are contacting the residents in the south west area of Port Hope with invitations to this open house?

Kind Regards,
John Buttell



Sent from my iPad

From: [Margot Currelly](#)
To: [Campbell, Dwayne](#)
Subject: Northumberland Next Growth Management Feedback
Date: Wednesday, July 10, 2024 7:27:34 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

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Hello There,

I just wanted to submit my two cents toward the Northumberland Next Official Plan project.

I am in ward 2 in the Municipality of Port Hope, operate a business with my husband and have three kids; 11, 10 and 8.

One thing I would like the County to really be aware of when looking at these potential expansion plans, in particular for housing and population, is the future availability/access of public education.

I think it would be wise of the County (if that isn't already part of the whole process) to meet with KPRDSB about their intentions to keep Port Hope HS up and running, because in the years since I've had school aged children it has felt like all the school board's plans for schools in the community have been haphazard and not up to date with projected municipal models of growth.

I am not opposed to a small high school, but since funding is based on number of students and programs available/offered is based on funding available, a small school can only remain a functioning option for so long. And ever concerned with saving money, I do believe the school board would not hesitate to close it down.

Personally, I wouldn't be surprised if my kids had to be bussed outside the municipality by the time they get to grade 9 and that is based solely on some minor involvement I've taken part in with KPRDSB's community reviews, future plans etc.

Again, if looking to foster population growth in Port Hope, that generally means younger demographic, families etc. Being able to have your children go to school all the way through secondary school in their home town is an important piece of the puzzle.

Margot Currelly

We are very concerned by the process with which this major housing decision affecting the town of Port Hope and its residents was/is being made. It is being dropped in both town councils' and residents' laps as a fait accompli. The effects of 5000 new homes built in break neck speed on community resources requires full and open discussion among all residents and their elected officials so as ensure community cohesion and support. We believe the process upon which this decision has been made and its designated location is premature and must be redrawn with full involvement of Port Hope residents and their elected officials. Anything else is indefensible and set to fail. Dale and Robert DeMatteo, [REDACTED]

31m

Robert Fishlock



July 12, 2024

The Corporation of the County of Northumberland
Planning and Economic Development
555 Courthouse Road,
Cobourg, ON K9A 5J6

Attention: Dwayne Campbell,
A/Director of Planning and Economic Development

Re: County Official Plan Update and Growth Management

I am writing to provide my comments on the proposed amendments to the County official Plan that will expand the urban area of the Municipality of Port Hope. For some of the reasons that follow, I support the proposed expansions.

In my opinion, they are required in order to facilitate and enhance the viability of the Port Hope economy and the social services that depend upon it. Simply put, Port Hope needs future growth in order to remain a viable community that can support the various social and economic services that we have come to expect. This will not happen overnight. The proposed new areas are intended to be developed over the next 25 years.

However, if we do not plan for such growth in locations that make the most sense, it will either not happen or it will happen in locations that do not make sense. Places like Garden Hill, Osaca or perhaps a random location within our rural zones. Most experts in urban planning agree that we should avoid urban sprawl and focus growth on our existing major urban areas. That is where we can leverage our existing urban infrastructure to support new communities and maintain the vibrancy of our older urban areas.

Furthermore, I believe Northumberland County, in particular the Municipalities of Port Hope and Cobourg, have a social obligation to share the burden of growth being experienced across southern Ontario. We have a beautiful county and I believe that we can accommodate balanced growth and build progressive and sustainable communities without sacrificing the lifestyle that we currently enjoy. I was very disappointed to hear comments at the earlier public consultation meetings that echoed **“Not In My**

Backyard”. Some people said that the County should direct development to another part of Port Hope or to Hamilton Township. The areas identified for growth immediately north and west of the former Town of Port Hope boundaries make the most sense to me.

I must say it is sad that this initiative is not coming from the Municipality of Port Hope itself. Over the past few decades, I have seen development leapfrog over Port Hope to the Town of Cobourg. Cobourg appears to have been always planning for development and the amount of vacant community zoned land in Cobourg today speaks volumes. Additional urban development, particularly employment and commercial retail development, means additional tax dollars to support the cost of public services. In Port Hope, after the loss of most of its traditional industrial employers, the tax burden rests heavily on residential property owners.

With respect to concerns that we cannot lose any more farmland, I do not think that this is a major concern in this county. We enjoy an abundance of rural and agricultural lands. These proposed urban expansions are relatively modest. Yes, to the west of Northumberland, one can see out of control growth and a need to preserve “green” agricultural areas. However, there could be little future development in Northumberland County if we do not sacrifice some agricultural land.

In light of this legitimate concern, I do support further studies of the future demand for agricultural land in the County and policies to protect such lands where appropriate. The Wesleyville Settlement area should be considered in that regard, as there has been no serious demand for employment uses at Wesleyville for approximately 50 years and thoughts of creating a large isolated residential community flies in the face of recognized urban planning principles.

Thank you for this opportunity to comment on your proposed Official Plan amendments and thank you for all of your team’s hard work.

Yours truly,

Robert Fishlock

Copy:

Mayor Olena Hankivsky, Port Hope
Councillor Todd Attridge
Councillor Les Andrews
Councillor Claire Holloway Wadhvani
Councillor Adam Pearson
Councillor Vicki Mink
Councillor Darrell Toms
Shrishma Davé, Port Hope Clerk
Todd Davis, Port Hope Director of Planning

From: [Bruce Forrest](#)
To: [Campbell, Dwayne](#)
Cc: mayor@porthope.ca
Subject: Growth and Management May 23 presentation
Date: Monday, May 27, 2024 7:34:33 AM

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Dwayne Campbell
Acting Director of Planning and Development
Northumberland County

May 24, 2024

Comments re: Growth Management Amendment to the Official Plan presentation May 23

Let me first state that I am not opposed to the need for “affordable” housing development. I am in favour. The question becomes how do we do this with the least disruption to the existing population, the environment, food sustainability (farm community) and traffic disruption leading to future congestion.

It was stated that development had to go west of the town and below the 401 highway. This statement by the presenter, regarding this option, was based on interviews he had done in 2001 while working on then plans for Port Hope. I respectfully reject the 23 year old interviews as the municipality has changed dramatically since then. There are many more residents. More have become commuters, the environment has become more of an issue, food sources and costs are increasingly coming under scrutiny and traffic is becoming more of an issue. I came away from the meeting with the feeling that the presentation was more for information only. The willingness to rethink any suggestions was addressed with “put it in writing” as all that was being mentioned couldn’t be remembered. There was only a slight hint of another look. Approximate time lines were given for planning and development but locally it has been noted that the clearing of wind rows on the fields on the east side of Baulch Road have already been completed.

The proposed site is prime agricultural land. It annually produces corn, wheat and soy beans. These are all necessary and are the base products for our non-imported food production industry. The farm that works that land is located on Marsh Rd. It also uses Marsh Rd. to access fields further away as witnessed by the current traffic of farm machinery and transport

that occurs from March until November each year. Marsh Rd. will probably have to be rebuilt with new infrastructure, curbs and surfacing. This will no doubt lead closures.

In regards to the environment. There are CONSTANT breezes blowing from the west along the Marsh Rd. corridor. When the "Verandas" development went in, there were days when the dust was blowing across Toronto Rd. Local residents lost the use of the backyards on many a summer's day over a two year period. No abatement programs were ever initiated. In addition, what are the plans for Little's Creek and the surrounding woodland?

May I suggest that the current proposed development take a look at traffic patterns. As mentioned, the current pattern on Marsh Rd. consists of agricultural, residential, cycling, hiking and commuting vehicular traffic using Deer Park and Highway 2.

The use of lands on the north side of the 401 is no longer the issue it might have been in 2001. The commuting distance to downtown and shopping services of Port Hope are no greater via Toronto Rd., Cranberry Road / Victoria St. or Ontario St. Access to the 401 interchanges from the north are shorter than the access from the proposed development site.. Access to the proposed Employment Area on the east side of Highway 28 north of the 401 is also much shorter. Port Hope is becoming more and more a commuting municipality. Do we want to create more congestion on Marsh Rd. and Lakeshore Rd.?

There is land just north of the 401 between Toronto Rd. and east to Cranberry Rd and perhaps a little further, and north to Dale Rd. This was the site of a now demolished motel and some gravel pits. This site will draw some local complaints, as will any site chosen, but it will be less disruptive to fewer residence and less destructive of agricultural land than the current proposal.

It was stated that there was time before final approvals by council and we have until the fall Of 2024. In essence that is not much time if a re think were to occur and much of the land studies had to be redone to meet the deadlines. It is easier to just go ahead but this is a decision needing 21st century thinking that encompasses the least impact on the current residence and the environment. There are many communities that border both sides of the 401 today, why not Port Hope?

Respectfully submitted,

Bruce Forrest

[REDACTED]
[REDACTED]
[REDACTED]



June 12, 2024
Northumberland County Council
Dwayne Campbell, Director of Planning

RE: Proposed Amendment No. 2

Please accept this Written Submission with respect to the April 24, 2024 proposed amendment, I am providing two submissions, the first on the overall concept of where future growth should logically be located and the second on specifics within the proposed amendment.

I am writing as an individual, Registered Professional Planner in the Province of Ontario with over 35 years of professional practice in this province, the last 20 years of which was in the GGH. I am a fellow of the Canadian Society of Landscape Architects. I have been a resident of Port Hope for over 20 years. My deep experience of how land use planning processes work as a former land planning manager and director provides me with a broad understanding of the mechanics how the policies work/or not and how the proposed changes will impact the community.

Many of the proposed changes to the Northumberland Official Plan are necessary to address the requirements of the PPS and Growth Plan. The forecasts for population growth and employment are not debatable they are what is being required by the Province. Also, I agree that the forecasted growth should be accommodated in urban areas or by expansion to existing urban areas to take advantage of the infrastructure, public facilities and transportation networks that already exist.

Assigning all of the allocated growth to Port Hope can be questioned? However, whether by 2051 or further into the future, the Municipality of Port Hope should be looking to determine where best to expand. Recommended Policy B6 c) i) calls for "logical extension to the existing built-up area", iii) calls for efficient use of infrastructure as do the B9 policies; and iv) indicates access is to be provided efficiently. Based on these good planning principles it is surprising the recommended expansion is all to the west of Port Hope.

Since the meeting held on May 23, 2024 I have inquired and been unsuccessful in finding clear reasoning for the recommendation. The Growth Management Report does not appear to include alternative options and analysis, leading to the recommendation for all the growth to be on the west of Port Hope. I have found no evidence that expansion to the east was given any serious consideration in the Growth Management Report. The County as the regional planning authority is to make recommendations based on good planning principles. Annexation of some land to the east of the Hamilton/Hope Townline should have been given serious consideration.

Regardless of which direction expansion happens, there will be loss of prime agricultural area. The Port Hope sewage treatment plant is on the east end, going west will require a number of lift stations and a force main. Water has already been

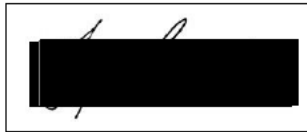
extended to Welcome. The consultant (Meridian) indicated that given the feelings expressed by the politicians and residents in 2001 it was not logical to go north of the 401. However, amalgamation of the Township and Town of Port Hope into the Municipality of Port Hope has occurred since then. Inclusion of lands north of the 401 as employment lands and rounding out the residential developments that exists in Welcome and along Choate Road would, in my professional opinion be logical.

Rather than allocating all the growth to the west of Port Hope, what would be more logical is to expand in westward to Baulch Road, enter into annexation discussions with Hamilton Township to take advantage of the natural gradient from Gage's creek towards the Townline and the available capacity at the sewage treatment plant without incurring the expense of lift stations and a force main. Having two areas of development (an east and a west) would give residents a choice on where they wish to locate and would take advantage of the existing transportation network including the 401 interchanges. Going exclusively to the west will over-burden Marsh and Lakeshore Roads without logical options to conveniently get to the 401.

These development areas coupled with employment development north of the 401 between the two interchanges would create a well rounded and accessible community.

My second letter will be sent following the June 13, 2024 meeting where I hope additional information from that provided at the May 23 meeting will be available to address the many questions residents had.

Sincerely,



Faye Langmaid, FCSLA, MCIP, RPP



C: Mayor and Councillors of Port Hope
Ganaraska Region Conservation Authority

June 14, 2024
Northumberland County Council
Dwayne Campbell, Director of Planning

RE: Proposed Amendment No. 2

Please accept this second submission with respect to the April 24, 2024 proposed Official Plan amendment. My first submission, dated June 12, 2024 addressed the overall concept of where future growth should logically be located. This submission deals with the specifics of the proposed amendment.

In the current Official Plan, policy C2.4 and 2.5 Secondary Plans appear in the Employment Section; it is not clear that these policies apply to all development. Potential solutions are: A companion policy requiring Secondary Plans for Residential Development in the proposed Official Plan Amendment, OR Include the requirement for Secondary Plans in the General Provisions at the beginning of C **LAND USE DESIGNATIONS**. Consideration should be given to a minimum area that a Secondary Plan would be required for, such as 40 hectares.

The only time sub-watershed studies are mentioned in the parent Official Plan is in D1.12.2 Protection of Watercourses under c) when discussing setbacks. Sub-watershed studies are the basis on which the natural heritage system and decisions regarding mitigation measures to allow for development to occur are made. They typically are a pre-requisite for Secondary Plans. Requiring sub-watershed studies early in the process is necessary and should be addressed in the proposed Official Plan Amendment. Further, sub-watershed studies should be included in E1.4 Subdivision Review Considerations as a requirement.

The definitions need to be carefully considered and vetted. They can unwittingly require additional work to implement a common sense solution. I provide these comments not as criticism but rather to assist with fine tuning.

In Section D1.4 Planning for Employment a) ii) prohibits residential, commercial, public services and institutional from Employment Areas. This is an older definition of Employment Areas, the areas have evolved, as has employment. It is now, often much different from 20 and even 10 years ago. It would be prudent to carefully consider allowing limited residential in the form of security for certain operations where a care-taker is part of the day-to-day operation. Employment lands need commercial in the form of restaurants, hair salons, child care and other services for workers. The recommended definition (below) could allow for them; however, it is a matter of interpretation of what ancillary facilities are. To a layperson the definition appears contrary and should be clarified.

"Employment area: means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and

ancillary facilities. Uses that are excluded from *employment areas* are institutional and commercial, including retail and office not associated with the primary employment use listed above."

Institutional uses such as major health care or educational facilities are compatible in Employment Areas and should not be excluded from the definition of "employment area".

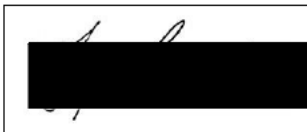
Public Services in the form of major recreational facilities (e.g. major tournament play facilities that generate noise, have lights and require significant parking) are compatible with Employment and Industrial, less so with residential. These type of public facilities can share parking, programmatic use and provide buffering. Accommodation in the form of hotels should also be considered compatible.

Where are the strategic growth areas in Northumberland County? Having them identified on a Schedule would assist.

The intensification policies are generally acceptable given the targets being set by the Province. They are much higher than what currently exists in any of the urban areas within Northumberland County. Integrating the two differing types of density will be a challenge for local municipalities.

As a former land use planning manager and director my broad understanding of how policies work/or not and how proposed changes will impact the community is why I am making these comments. Thank you for the opportunity.

Sincerely,



Faye Langmaid, FCSLA, MCIP, RPP



C: Mayor and Councillors of Port Hope
Ganaraska Region Conservation Authority

From: [Vicki Mink](#)
To: [Campbell, Dwayne](#)
Subject: Northumberland Growth Plan - Port Hope
Date: Friday, July 12, 2024 8:39:13 AM

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Hi Dwayne and Planning Team

I am sharing my feedback about the Northumberland Growth Plan as a resident. I attended the session in Port Hope and watch the earlier two remotely.

First, I would like to thank you for the time and effort.

1. EMPLOYMENTS LANDS

I would like to begin by talking about the block north of the 401, between CR28, Hamilton Rd, Telephone Rd and Dale Rd. This block has been identified as employment lands for a long time. I asked in the public meeting why it has been redesigned and there are no houses in the most northern portion of the block, behind the existing homes. I was told people don't want to live near industrial and it will take too long to get infrastructure up there.

First, I understand employment lands might be industrial, but they could be commercial and service industry as well. To me, it makes sense to have another commercial area north of the 401 to service the rural area and the urban residents in the northern area. As Port Hope grows significant, the current commercial areas are insufficient, as are the road networks leading to them. It makes sense to use Hamilton Rd, CR28 and Dale Rd to a commercial area north of the 401.

The block in question could have a few hundred homes in the north end, heavy employment in the south end, with commercial/service employment dividing them in the middle. When we look at Cobourg, there is housing behind the mall and Canadian Tire and across from the Best Western. In fact, some people want to be able to walk to work and to shop. Having no housing near the employment lands will force all residents to commute by vehicle.

As for the servicing, Port Hope has plans to build a water tower near croft, and wastewater is located directly down Hamilton Road. I understand there is a cost to running water under the 401 but there are plans to reconstruct the Hamilton Rd and Ontario St bridges. There is also a significant cost to building bridges and running water under the rail lines on the lands to the west end of town.

For me, it was quite concerning to hear that houses are not planned for the north end of that block because it will take a long time for the employment lands to be developed. That sounds like we are prioritizing houses over jobs. We cannot continue building houses without jobs! To me, designated homes at the north end of that block balances employment and residential growth, and provides incentive to develop there.

Last, we heard a presentation about the 401 bridges in Port Hope. The recommendation was to redesign the existing Ontario St Bridge and ramps south of the 401. I think that is a horrible idea because it takes the trucking route from Port Hope. It forces all traffic to use Rosevear and Wellington to get to the NW end of town. I question why CR28 is not diverted across the employment lands to Hamilton Rd. It makes sense to open Hamilton Rd as the access to the 401 and not bottleneck the main road leading to downtown Port Hope.

2. HAMILTON TOWNSHIP

As so many others have stated, I question why the lands along Hwy 2 and on the other side of Hamilton Rd are not part of the growth plan. New houses can share Port Hope water and wastewater. It is not too complicated. Development in that area would share other services that the community already shares, such as transit, hospital services, schools and commercial. It makes no sense to ignore the gap between the two communities, but makes all the sense in the world to connect them. Densifying between the communities is less costly in the long run. This also, supports my opinion that the 401 exit should be at Hamilton Rd as it gives better access to Port Hope and Cobourg and if Hamilton Township south of the 401 was a growth community.

3. WELCOME

I fully support the idea of more housing north of the 401 between Cranberry Rd and CR10. That land is gravel and does not have ecological significance. I understand there is a cost for bringing water across the 401 but there is a cost to bringing development anywhere. I do not foresee any disputes developing that land, which would speed up the process. Those lands are easily accessible by a diverse road network.

4. BAULCH ROAD AND WEST

I am not opposed to developing some housing to the clan immediately west of Baulch Road. There is already servicing and some infrastructure built. I am opposed to extending into the sensitive valleys and woodlands. The dispute and cost of studies and litigation will be significant and will (and should) hold up the process. Our ecological features must be protected and undisturbed. We need to take this seriously, especially when there are other options. I am disheartened to be part of a system that is okay to plow over those lands for no good reason. Also, the rail lines split and divide those lands. The argument that people don't want to live near employment lands applies here. Living near rail lines is unsafe and an annoyance. Rail lines require a buffer zone. When considering the protected areas and the rail, there is actually less than and a complicated building canvas to work on. Please consider moving some housing elsewhere.

Most importantly, please make sure the employment lands are prioritized. It is desperately needed.

Thanks,
Vicki Mink

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Northumberland County
600 William Street
Cobourg, ON
K9A 3A5

Dear Northumberland County Planning Department,

I am writing to provide my comments regarding the draft official plan and impacts of increasing medium and high density residential housing in the Municipality of Port Hope.

As a resident and taxpayer, I am deeply invested in the well-being and gradual development of our community. While I understand the need for growth and the benefits it can bring, I am concerned about the following implications that an increase in residential housing and density may pose:

1. **Property Taxes:** An influx of new residential properties will increase the requirement for municipal services while placing the tax burden onto new and existing Port Hope residents. This will lead to increased property taxes, in a municipality with some of the highest property taxes. The costs for this increase should be shared through the county, not placed solely onto the residents of Port Hope. The province should be providing additional resources for both the county and municipality to facilitate the increase in housing and population.
2. **Infrastructure Costs:** Each new residential property requires adequate infrastructure, including roads, utilities, and public services like policing and snow removal. Even while adequately planning for growth, the proposed expansion will seriously strain Port Hope's infrastructure budgets, leading to either deteriorating service quality or increased municipal debt to cover an expansion mandated by the province. The developers adding housing will not be contributing funds to offset these costs for the municipality, they will focus on their development area.
3. **Impact on Local Health Services:** While growth can bring economic opportunities, it may also affect local services negatively. The population of Northumberland County is an aging one that is already stressing the available health services and Northumberland Hills Hospital beyond capability. What additional resources are being offered by the province to support healthcare for our county? Ensuring that these services can meet the needs of a growing population without compromising quality is crucial but will need additional funding.

I encourage you to include more extensive consultation in the Port Hope community. **If the allotted county growth is going to be primarily placed in Port Hope the residents and municipal government should get to decide where that growth is placed.**

I think that the lands currently identified in the county's draft plan are prime agricultural land and there are much better locations, within the municipality, for residential growth that are still close to the highway but will not impact the agricultural area.

I appreciate your attention to these concerns and trust that the County will prioritize growth practices that benefit all residents, especially those directly impacted by these decisions. I look forward to participating in the next steps for the plans the County intends to undertake in Port Hope.

Yours sincerely,

Bree Nixon

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Robert and Heather Sculthorpe



July 16, 2024

Mr. Dwayne Campbell
A/Director of Planning and Economic Development, Northumberland County
555 Courthouse Road
Cobourg ON K9A 5J6

RE: Amendment No 2 to the Official Plan for Northumberland County

Dear Mr. Campbell

We realize this letter is sent a few days after the timeline for comments, but we have been advised that Northumberland County is accepting late comments because the website was down for several days during the comment period. With that understanding please accept our comments.

We want to start by saying that in the Report: Northumberland Next: Growth Forecast and Land Needs, principles for development for the county there are two aspects we would like to draw your attention to:

- Priority to preserving agriculture lands, and
- Sustainable growth

The proposed change of use of these lands in the “study area” brings into question the commitment by the county to these. We describe the reasons for this as follows.

Our comments are as follows:

1. The agricultural land classification of the majority of the land in the “study area” is Class 1 agricultural land. The northeastern portion has some land classified as Class 3 and Class 3 lands.

This information is provided in the documentation provided in the report by DBH Soil Services Inc.

The lands to the north of 401, east and west of Victoria Street / Cranberry Road, have classification 2, 3 and 4, as can also be seen in the supporting documentation.

Why it would be proposed to develop Class 1 agricultural land when there is available undeveloped land closer to the core of Port Hope which is Class 2, 3 or 4. We recommend this be re visited.

2. As an owner of the farm enterprise which contracted to have the lands to the east and west of Brand Road systematically tile drained, and subsequently farmed the land for more than a decade, I can confirm it is excellent farmland.

3. Dr. Barbara Frei, when she was a McGill University PhD candidate, as part of the research for her doctoral thesis, conducted a survey of wood lots in the vicinity to identify nesting pairs of red headed woodpeckers. She identified that there was a nesting pair of red headed woodpeckers nesting in the deciduous woodlot on the steep south facing slope to the east of Brand Road. The red headed woodpecker is a threatened species. Regard must be given to their habitat.

4. A review of the maps provided in the natural heritage study shows that a significant portion of the lands to the west of Baulch Road have natural heritage features, streams, forests/woodlots, and wet, damp areas resulting in the “study area” with reduced space available for residential development. This limits the practicality for residential development of these lands.

5. The area east of Baulch Road has a meandering stream and an area of natural scientific interest (ANSI).

6. Further the south facing slope and the west facing slope on the lands both east and west of Brand Road to the north of the CP railroad, again will negatively impact the practicality of the development of these lands. There are better locations contiguous to the urban portion of Port Hope which do not have these topographical impacts.

7. The CP Railroad forms the southern and western boundary of the “study area”. And the CN Railroad is also a further 100 metres to the south. Constructing residences in the “study area” will increase the risk to the residents from a safety perspective. Children are attracted to trains.

8. The presence of trains passing close by will create noise. Approximately 75 to 100 trains a day pass by this location on the three tracks (CPR single track and CNR double track). And with the level crossing at Brands Road and at Haskill Road, and well as at the CP siding (trains sound the whistles prior to starting to move.) there is a significant amount of high-volume train noise levels along the southern and western boundary of the “study area”.

This may be mitigated, to a degree, by the municipality requiring additional sound attenuation requirements for the walls, windows and doors of residences built in the vicinity (the City of Toronto has such a bylaw requiring Sound Transmission Class (STC) 70 as a minimum requirement). This will add additional cost to the construction, and still does not address the noise when the residents

are outside in public areas or their back yards. It is very unlikely that municipal politicians will not receive complaints about the noise in the future if this development proceeds.

9. The Blue Plan Engineering study makes note of the sewer requirements. When the elevation of the lands along the southern boundary is considered and compared with the elevation of the sewage treatment plant, the sewage will need to be pumped to the sewage treatment plant for the majority of the distance. This is not part of sustainable development. Potable water by necessity must be pumped to the residences but the sewage system should primarily take advantage of gravity to move the sewage flows to the treatment plant. There are other locations contiguous to the urban portion of Port Hope when this could be better optimized, such as the lands to the north of 401 in the vicinity of Victoria Street/ Cranberry Road, where gravity could be used advantageously to move the sewage to the elevation of the Ganaraska River, and then a trunk line be located down the river valley, or the sewage be pumped a comparatively shorted distance to highway 28 where it could feed into the sewage network needed for the urban expansion planned beside highway 28 south of Dale Corner. There is a natural south slope from this location to sewage treatment plant which again could be taken advantage of.

10. A further comment is regarding the lands to the west of Brand Road. The Blue Plan Engineering report makes the comment that there may need to be an additional sewage pumping station to service the sewage network for this portion of the study area. I can assure you, having farmed the fields at that location that it will be necessary as the lands slope to the west and drain under the CP railroad, and as such the elevations are such that the sewer lines downstream from that location would have to be too deep to enable gravity to move the sewage to the next pumping station to the east.

11. The last comment regarding the sewage network is that the comment is made in the Blue Plan Engineering report that the capacity of the sewage network from the Strachan St. / Victoria Street pumping facility to the pumping facility downstream at the Ganaraska River is not known and may need to be expanded. If this is found to be required the residents in that area of the town will be disrupted again, just as they have just finished living through the disruption caused by the PHAI and the ongoing clean-up.

12. Many of the residents of Port Hope commute using highway 401, highway 28, or trains. There are lands which can be developed both inside the urban portion of Port Hope or contiguous with the urban portion of Port Hope, which are closer to entrances onto highway 401, highway 28, and in many locations the train station as well, than these lands proposed for rezoning to residential in the “study area”.

While we welcome the opportunity to provide input, we are confident there are other locations both in and at the edges of the urban area of Port Hope which would:

- Not result in the loss of prime Class 1 farmland
- Not result threaten the important natural habitat used by at least one threatened species the red headed woodpecker.
- Not require the pumping of both potable water and sewage to and from the developed lands rather than integrating development into the natural topography and taking advantage of the existing topography.
- Not have such a high proportion of the area being considered to have wood lands, wetlands and streams and drainage areas running through it, resulting in more costly development.
- Not have such sloped topography, making construction more costly
- Not have trains bordering the area both generating excessive noise and safety issues.
- Allow for more sustainable residential development by having gravity power the movement of the sewage for the majority of its movement to the treatment plant. Potable water by necessity must be pumped to the residences but why rezone land for residential development in locations where both the water and the sewage must be pumped. It is not consistent with sustainable development.
- Not have potential issues with existing sewage network which may need capacity expansion requiring construction through an existing urban residential area, already impacted by the PHAI cleanup activities.
- Provide ready access for many of the residents of Port Hope who commute to work using highway 401, highway 28, or trains. There are lands which can be developed both inside the urban portion of Port Hope or contiguous with the urban portion of Port Hope, which are closer to entrances onto highway 401, highway 28, and in many locations the train station as well, than these lands proposed for rezoning to residential.

We trust these comments will be given proper consideration. If you would like to speak with either of us, please do not hesitate to call us at the numbers below.

Regards,

Robert Sculthorpe



Heather Sculthorpe



Cc Ms. Olene Hankivsky, Mayor, Municipality of Port Hope
Mr. Todd Davis, Director Planning and Development, Municipality of Port Hope

From: [H. Stoosh](#)
To: [Campbell, Dwayne](#)
Cc: ["Jane Zednik"](#)
Subject: RE: Northumberland County Draft Official Plan Growth Plan Amendment - Comments
Date: Monday, May 27, 2024 10:28:27 AM
Attachments: [image001.png](#)
[image002.png](#)

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Good morning Dwayne:

If the intent as you state is to establish a policy framework in accordance with provincial policy .. then the word 'preferred' should be stricken and the original wording of 'may' be re-instated to conform to the PPS:

*1.6.6.3 Where municipal sewage services and municipal water services are not provided, municipalities **may** allow the use of private communal sewage services and private communal water services*

The word 'may' supports the Port Hope OP and its restrictions. *"Communal water supply and/or sewage disposal systems shall not be permitted anywhere in the Municipality."*

If the wording is changed to 'preferred' it does not *"support the use of municipal, communal and/or private services in appropriate urban or rural settings that is sustainable, feasible and financially viable **at the discretion of the each local municipality**"* because this provides the opportunity for developers to override the Port Hope OP and install communal systems even though not allowed in Port Hope. Communal systems since they are 'preferred' could be used to service and support the planned change to the boundaries of Port Hope taking (131 hectares) (323.7 acres) of rural agricultural land into residential development with a goal of 4,495 housing units.

From: Campbell, Dwayne [mailto:campbelld@northumberland.ca]
Sent: May 24, 2024 1:13 PM
To: H. Stoosh <[REDACTED]>
Cc: 'Jane Zednik' <[REDACTED]>
Subject: RE: Northumberland County Draft Official Plan Growth Plan Amendment - Comments

Hello Jane.

Further to Cheryl's response I will add that your comments have been forwarded to our consultant team for consideration. I will also note that it is not the intent for Northumberland County to assume ownership/operation of private communal sewage and/or water services nor be responsible for municipal responsibility agreements. Rather, the intent is to establish a policy framework in accordance with provincial policy that will support the use of municipal, communal and/or private services in appropriate urban or rural settings that is sustainable, feasible and financially viable at the discretion of the each local municipality.

Dwayne

--

Dwayne Campbell, MCIP, RPP

A/Director of Planning and Economic Development

[Northumberland County](#)/t 905.372.3329 x2408

From: Sanders, Cheryl <sandersc@northumberland.ca>
Sent: Tuesday, May 21, 2024 4:19 PM
To: H. Stoosh <[REDACTED]>
Cc: 'Jane Zednik' <[REDACTED]>; Campbell, Dwayne <campbelld@northumberland.ca>; Mather, Maddison <matherm@northumberland.ca>; Sanders, Cheryl <sandersc@northumberland.ca>
Subject: Northumberland County Draft Official Plan Growth Plan Amendment - Comments

Good afternoon,

Thank you for forwarding the attached correspondence. Please note, your correspondence will be added to the June 5th, 2024 Economic Development, Tourism and Land Use Planning Committee with personal information redacted.

Thank you,

Cheryl Sanders | Deputy Clerk

Northumberland County | 555 Courthouse Road, Cobourg, ON, K9A 5J6

T 905-372-3329 ext. 2361 | F 905-372-1746

E sandersc@northumberland.ca | www.northumberlandcounty.ca

From: H. Stoosh <[REDACTED]>
Sent: Thursday, May 16, 2024 9:07 AM
To: Campbell, Dwayne <campbelld@northumberland.ca>
Cc: 'Jane Zednik' <[REDACTED]>
Subject: Northumberland County Draft Official Plan Growth Plan Amendment - Comments

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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 municipal sewage services and municipal water services are not provided, municipalities 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.”

Post 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*”

From: [Timmermans, Cara](#)
To: [Campbell, Dwayne](#)
Subject: RE: Northumberland Next - Facebook Message
Date: Friday, July 12, 2024 8:36:11 AM
Attachments: [image002.png](#)
[image003.png](#)

Hi Dwayne,

Just wanted to pass along this message that came through our Facebook page regarding the Official Plan Update.

I attended the information session on the proposed changes to the official plan for Northumberland county in port Hope a few weeks ago. I live in ward two and have huge concerns like other residents, about these changes to allow for more housing. We certainly don't want or need good agricultural land used for housing. If housing developments are to be built in the coming years, they need to be close to services already in place or in hamlet's, such as Welcome.

Subdivisions don't pay long term only short term and will need infrastructure as well for the new residents you claim will be coming this way..

Most residents at this meeting had serious questions and concerns and great suggestions as well, and do hope the county reconsiders what is being proposed. Our taxes here are high enough already and go up yearly. We can't afford anymore increases nor should we shoulder the increase which will happen if this goes through as proposed. Regards
Lori Andrus

13h

Thanks,
Cara

From: Timmermans, Cara
Sent: Wednesday, July 10, 2024 3:50 PM

To: Campbell, Dwayne <campbell@northumberland.ca>

Subject: Northumberland Next - Facebook Message

Hi Dwayne,

Just wanted to flag the message below regarding the Official Plan update in case you wanted to include it in the feedback gathered. I'll keep an eye out for anything else being shared through social media.

We are very concerned by the process with which this major housing decision affecting the town of Port Hope and its residents was/is being made. It is being dropped in both town councils' and residents' laps as a fait accompli. The effects of 5000 new homes built in break neck speed on community resources requires full and open discussion among all residents and their elected officials so as ensure community cohesion and support. We believe the process upon which this decision has been made and its designated location is premature and must be redrawn with full involvement of Port Hope residents and their elected officials. Anything else is indefensible and set to fail. Dale and Robert DeMatteo, [REDACTED]

31m

Thanks,
Cara

Cara Timmermans (She / her / hers)

Digital and Document Accessibility Specialist

Northumberland County | 555 Courthouse Road, Cobourg, ON, K9A 5J6

T. 905-372-3329 ext. 2262

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From: [mark hutchinson](#)
To: [Campbell, Dwayne](#)
Cc: [Brian Ostrander](#); mmartin@cramahetownship.ca; scottjibb@hamiltontownship.ca; [Lojel, John](#); bob.crate@trenthills.ca; mavor@porthope.ca; mavor@cobourg.ca
Subject: Growth Management Amendment to the County's Official Plan-Proposed Expansion to the Codrington Rural Settlement Area for Residential Development
Date: Friday, July 12, 2024 6:15:37 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

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Brighton Table D

Land needs for community uses and employment land in Urban areas 2021 to 2051

Your own report from 2021 to 2051 Brighton does not require additional land for community uses and employment land

Page H-6 Municipality of Brighton Urban land needs analysis.

Land need	2051
Community Area Land Supply	383
Community Area Land Demand	190
Community Area Land Surplus(ha)	193

Year 2051 Brighton has surplus of 193 ha (Urban Land).

Also heard Brighton is looking to expand the building boundary south of 401.

Presently municipality in secondary planning process that will help to increase intensification.

With surplus urban land 193 ha, expansion of building boundary , increase intensification all south of the 401. Brighton will more than meet their Urban land needs well beyond 2051 on land that has all services.

Suburban sprawl cancels carbon-footprint savings of dense urban cores- (UC Berkeley study) Interactive carbon-footprint maps developed by UC Berkeley researchers show that while population-dense U.S. cities contribute lower greenhouse-gas emissions per person than other areas of the country, these cities extensive suburbs essentially wipe out the climate benefits.

Dominated by emissions from cars, trucks and other forms of transportation, suburbs account for about 50 percent of all household emissions-largely carbon dioxide-in the United States. A key finding of the UC Berkeley study is that suburbs account for half of all household greenhouse gas emission, even though they account for less than half the U.S. population. The average carbon footprint of households living in the center of large, population-dense urban cities is about 50 percent below average, while households in distant suburbs are up to twice the average.

From Codrington you have to drive or have delivery for everything you need. CBM and others have the perfect opportunity to promote green crops and cover crops on their agricultural land which pull (absorb) and stores carbon from the atmosphere. This could help with carbon footprint of their aggregate operation.

CBM stated subject area is land locked as result of road allowance closure 2016. CBM was involved in this process and discussions, now say subject area is land locked and want to double the size to 30 acres.

June 21,2023, public meeting held at the Codrington Community Centre for the proposed development. The centre was full of residents who strongly objected to this proposal. 100% of the people who signed a petition were against this development.

We have lost some of best agricultural land in Ontario, does our County want to contribute to this total, losing prime agricultural area, when the province proposes that the County add 17,737 ha to the paa.

Why are we proposing to make the Rural area look like the city. Tourist come here to enjoy our Rural area.

Farmland is little to no cost to the municipality.

Why is development and expansion being considered in Codrington on non-serviced rural farm land , when there are building lots available now and in the future with infrastructure and services in place south of the 401.

Agriculture is a vital sector of the Northumberland economy.

We object to this proposed development.

Mark Hutchinson



Re: Growth Management Amendment to Northumberland County Official Plan

As a Codrington resident and concerned community member, I am writing to express my opposition to the proposed expansion to the Codrington Rural Settlement Area for residential development.

The building of luxury homes on large plots is not a solution to the housing crisis we are experiencing across the province. According to the County's own Growth Management study, there is already a surplus of fully serviced lots south of the 401 in Brighton. These could be developed into affordable housing without destroying yet more of our precious farmland.

Codrington residents unequivocally expressed their opposition to the proposal in a petition with over 100 signatories, and at a public meeting on June 21 last summer. That the proposal comes at the request of CBM, a foreign owned company whose representatives promised the community to maintain this parcel of land as a buffer zone between us and their gravel pit, is particularly irksome.

Codrington is a tranquil rural community. We welcome new neighbours, but not a large subdivision which would destroy farmland at a time of unprecedented food insecurity, increase maintenance costs to the county and create dangerous traffic conditions at the intersection of Aranda Way and Highway 30.

We ask the County Council to reject this proposal.

Respectfully yours,

Barbara Lamb

[REDACTED]

[REDACTED]

Dwayne Campbell
Land Use Planning & Inspection Services Manager
Northumberland County
campbelld@northumberland.ca

July 2, 2024

Re: Growth Management Amendment to County Official Plan – Proposed Expansion to the Codrington Rural Settlement Area for Residential Development

The Northumberland Federation of Agriculture represents (NFA) over 750 farm families and works in partnership with the Ontario Federation of Agriculture (OFA) to be the voice of agriculture in Northumberland County. We are part of a vibrant and innovative industry, taking pride in feeding our communities and our country.

NFA would like to voice its opposition in response to the proposed amendment of the Northumberland Official Plan to designate agricultural land adjacent to the Hamlet of Codrington to be part of the rural settlement area to facilitate future development within the Hamlet as shown on Schedule X21.

The Provincial Policy Statement gives guidelines when municipalities consider expansion of a hamlet. We would like to draw your attention to **Section 1.1.3.8**

“A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review and only where it has been demonstrated that:

c) in prime agricultural areas:

2. alternative locations have been evaluated, and

i. there are no reasonable alternatives which avoid prime agricultural areas; and

ii. there are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas”

Section 2.3.1 says,

“Prime agricultural areas shall be protected for long term use for agriculture.

Prime agricultural areas are areas where prime agricultural lands predominate. Specialty crops shall be given the highest priority for protection, followed by Canada Land Inventory Class 1, 2 and 3 lands, and any associated class 4 through 7 lands within the prime agricultural area, in this order of priority.”

In this case, NFA is in opposition to the amendment of the official plan to change productive agriculture land into housing development. This parcel, which the Canadian Land inventory indicates is class 1 agricultural land and the Ontario soils map shows this as a highly productive Wooler Silt loam with moderate slope and stone free, is a productive food producing property that we need to preserve for continued agriculture practices for now and in the future. At this time, there is no evidence that shows there is a shortage of alternative land in this municipality for development.

Furthermore, we are deeply concerned by the rapid loss of prime agricultural land in southern Ontario. According to Canadian Census data, Ontario is losing 319 acres per day of prime farmland. Only 5% of Ontario's land mass is arable and capable of producing the over 220 food products enjoyed by Ontarians and the world. The Ontario Agri-food sector contributes \$47 billion annually to the Provincial GDP and employs over 750,000 people, or 10% of the Ontario labour force. Further rapid development of prime agricultural land threatens these significant economic contributions to the province.

In conclusion, agriculture is a vital sector of the Northumberland economy and every acres matters.

Allan Carruthers
President of Northumberland Federation of Agriculture

July 12, 2024

Dwayne Campbell
Acting Director of Planning & Economic Development
Northumberland County
By Email via: campbelld@northumberland.ca

Re: Northumberland County Draft Growth Management OPA (Draft OPA 2)

I am writing to express my opposition to the proposed “Rural Settlement Area” designation of an approximately 15.3 acre block of land adjacent to the eastern boundary of the Codrington Settlement Area, south of Aranda Way and east of County Road 30. This land is identified as the largest light green rectangle on “Schedule X21 of Northumberland Official Plan Amendment Number 2 (Codrington – Brighton)” and is presently owned by CBM Aggregates.

In the proposed Official Plan Amendment Number 2 (OPA 2), Section B.7 says:

"B7 URBAN AREA LAND NEEDS ANALYSIS

On the basis of a Land Needs Analysis (LNA), **Table D** below identifies how much additional land is required for community uses and employment land in the *urban areas*:



TABLE D

LAND NEEDS FOR COMMUNITY USES AND EMPLOYMENT LAND IN URBAN AREAS - 2021 TO 2051

Urban Area	Community Lands (ha.)	Employment Lands (ha.)
Cobourg	0	31
Port Hope	131	75
Campbellford	0	34
Hastings	0	5
Brighton	0	0
Colborne	0	0
Total	131	145

According to Table D and the Land Needs Analysis (LNA) completed on behalf of Northumberland County and relied upon as technical information used to develop OPA 2, the Municipality of Brighton has no need for any additional Community Lands or Employment Lands between 2021 and 2051. Given this information, it appears to be premature to designate any additional land for these uses in Brighton and it seems especially inappropriate to allow additional development on prime agricultural land currently used for farming, designated "Agricultural Area" on Schedule A of the Northumberland County Official Plan, and completely lacking any septic or water services.

Additional concerns with the proposed "Rural Settlement Area" designation of the 15.3 acre block is that if developed for residential use, as has been proposed, the additional road use on Aranda Way is likely to have impact on this narrow road (presently limited to one vehicle width in some places (e.g. crossing the stream on the road culvert near these lands). And there is increased potential for accidents at the intersection of Aranda Way and County Road 30 where sight lines are already limited for vehicles turning from Aranda Way onto County Road 30.

Thank you for considering these concerns and my opposition to the proposed expansion of the Codrington Settlement Area.

Sincerely,

Jackie Van de Valk

Re: Growth Management Amendment to Northumberland
County Official Plan

When CBM proposed the gravel pit in Codrington they promised to be a good neighbor and called the land surrounding the pit a buffer zone to mitigate the noise and dust that a gravel pit produces.

Now CBM wants to go back on its word and monetize the land surrounding the pit.

At a very well attended meeting in Codrington Community Centre on June 21st last year residents strongly objected to CBM's proposal to expand Codrington. There is no benefit to the community from this proposed subdivision.

The intersection of County Road 30 and Aranda Way is dangerous because it is blind to the south and would need \$Millions to make it safe for increased traffic flow, also the culvert on Aranda Way only supports one lane at a time so would need upgrading at municipal expense.

CBM's only motivation is financial gain at the expense of the community.

The land in question is prime agricultural land, CBM has the option to sell it to a local farmer and the buffer zone will remain intact and the community will be undisturbed.

Brighton has already allocated all of the land that is needed to comply with the province's requirements to 2050 and beyond in areas that can be fully serviced by the municipality. Therefore, there is absolutely no need for the prime agricultural land in Codrington to be lost to residential use.

Efficient municipal planning is a cornerstone of good governance. Well planned communities are pleasant to live in and cost effective to manage. Communities in rural environments are very special places – they exist because the land supports them by providing space for crops and to raise animals.

Enlarging these communities in an unnatural manner destroys what they were and takes away the prime farmland that supported their existence in the first place.

Expanding Codrington just so CBM can benefit financially is very poor planning.

The planners of Northumberland should have as their first prerequisite that no more prime agricultural land be bulldozed.

Their job is to find sites within fully serviced built-up areas and adjacent land that is not suitable for farming.

Northumberland is a rural community; 6 Million tourists come to Northumberland each year and spend \$550 Million to enjoy the vista of open fields and wooded knolls – not subdivisions.

I urge the members of Northumberland Council to reject the proposed development in Codrington.

Willie Wham



From: [Clive Cudmore](#)
To: [Campbell, Dwayne](#)
Subject: Official Plan
Date: Monday, June 3, 2024 9:43:19 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: External E-Mail

Hi Dwight:

My wife and I were at the open house on May 23, and I have meant to email you before now. We are strongly opposed to the movement of the western boundary of Brimley Road S. in Grafton. My comments, however, are broader than that.

We have a finite amount of arable land on which to produce food to feed ourselves, and in an ideal world, none of it would be taken for development. We all realize this is an impossibility, and I admit that the land on which our current house sits was farmland 30 or more years ago, and probably very high quality farmland at that.

I would hope that we have learned something in the past 30 years, and certainly the uproar over the Greenbelt changes seemed to show this.

It would appear that the planning process in this instance is based on the short sightedness of a landowner, to convert a piece of the very finest farmland into a development. It is not needed for any reason other than to make a developer rich.

Making the land in question, both in Grafton and in other parts of the county, part of hamlets, and therefore likely to be developed, will not solve Canada's or Ontario's housing crisis.

Building homes in areas where they are on septic systems is not a way to build the necessary density. You know better than I that what is needed is increased density in areas with full services and access to public transport. Not in areas where the only transport available is by private automobile.

We could be accused of Numbysism, as my wife and I have been lucky enough to have spent the majority of our adult life living in such areas, but in this day and age, it becomes less and less suitable as a living option. It just eats up too much valuable farmland.

We hope to be present at the meeting on June 5, and given the opportunity will address the subject again then.

I do not know the planning criteria under which you work, but it would seem to me that one of the considerations which should be made, before we pave over more farmland, would be the quality of the farmland in question. Not all farmland is created equal. The land in question in Grafton is some of the best I have ever seen.

I would make one further comment, on the timing of this meeting. I am a retiree, and can afford the time to attend, but many working people would not be able to do so. For the farming sector, the meeting is at an even worse time of the year. This is planting season, which is a time of year where 18 hour days are not uncommon. I do not know when the meeting for the agricultural sector is, but given the timeline for the final report, I doubt that there will be a good time for adequate participation by our farmers.

Thank you for your consideration

Clive Cudmore

From: [Shannon Linton](#)
To: [Campbell, Dwayne](#)
Subject: Re: Draft Growth Plan
Date: Wednesday, July 10, 2024 3:11:57 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

CAUTION: External E-Mail

Hi Dwayne,

I am certainly not an urban planner, but I think increased density and ideas like the 15 minute city are the way of the future (the very, very near future). I would be looking for in-fill development, growing up more than out, and that kind of concept as much as possible.

Thank you,

Shannon Linton

From: Campbell, Dwayne <campbelld@northumberland.ca>
Sent: July 3, 2024 3:18 PM
To: Shannon Linton [REDACTED]
Subject: RE: Draft Growth Plan

Hello Shannon. Thanks for the feedback. I agree, farmland needs to be protected and preserved. Northumberland County has been proactive in policies to protect local farmland. With 31% of land in Northumberland currently zoned as protected agricultural land, we have not experienced the significant loss of farmland in our community that has unfolded in other areas, and we are actively taking steps to ensure we continue to protect this vital system for future generations.

Our current proposal to expand Port Hope and Grafton is being made with the utmost consideration of agricultural impact. Northumberland has a Provincial mandate to accommodate forecasted growth and has committed to sustainable growth which includes expanding much-needed housing availability and employment opportunities while preserving rural heritage. Is there another area that you think would be more appropriate for the inevitable growth that is occurring within our community?

Dwayne

--

Dwayne Campbell, MCIP, RPP
A/Director of Planning and Economic Development
[Northumberland County](#) | t 905.372.3329 x2408

From: Shannon Linton [REDACTED]
Sent: Thursday, June 27, 2024 2:55 PM
To: Campbell, Dwayne <campbelld@northumberland.ca>
Subject: Draft Growth Plan

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: External E-Mail

Mr. Dwayne Campbell,

My name is Shannon Linton and I am a Hamilton Township resident living on a fifth generation family farm. I wanted to write to you as I was made aware that the draft Official Plan amendments to the Growth Plan are being discussed at this time. I would like to voice my opposition to expanding residential and industrial settlement areas in Grafton and Port Hope on over 500 hundred acres of active class 1 and 2 farmland. We are losing farmland at a rate of approximately 400 acres a day in Ontario, and we cannot continue on this path. There are many other ways to achieve development goals that provide homes and business opportunities, and our farmland preservation needs to be a major priority.

Thank you,

Shannon Linton

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

MS. TAMMY ARCHER



July 12, 2024

County of Northumberland
Mr. Dwayne Campbell

Further to my phone message on today's date I am writing to make comments about the official plan update. I have owned the property located at [REDACTED] in Municipality of Brighton for 32 years.

The north part of the property is basically 50 acres of workland and buildings. The south part of the property is basically 30 acres of marginal land that is adjacent to the hamlet of Orland and Cold Creek is the southern boundary. The hamlet sign is located halfway along the 30 acre parcel. The terrain is uneven and property has a large side hill. It has never been worked as farmland in the 32 years I have owned it and I am told it was never cultivated for 30 years prior to that by a local farmer. It has only been used as pasture or sat vacant for 32 years.

I notice that the southern edge of Orland has mapping indicating potential for development. There are 2 subdivisions on the south side of Orland now. I do not understand why that parcel of approximately 30 acres would be marked agriculture and not rural area given the use and topography and characteristics of the property.

In addition the property is adjacent to the settlement area and has full service with natural gas and services all along County Road 30. It seems to make sense that that area would be a logical area to develop in the long term and given it has not been workland for 60 years we know of and given the characteristics of the property it will not be in the future.

I believe it makes sense to keep the development areas together and this property makes perfect sense to develop. The field to the north of it is excellent farmland and I would never make that suggestion. Development has to occur somewhere and this property I believe fits the bill for what should in fact be developed years down the road.

Thanks for your consideration.

Tammy Archer



Experience. The Difference.™

July 11, 2024

Dwayne Campbell
Acting Director of Planning and Economic Development
Northumberland County
555 Courthouse Road
Cobourg, ON
K9A 5J6

Re: Northumberland County Comprehensive Review of the Official Plan – Growth Management

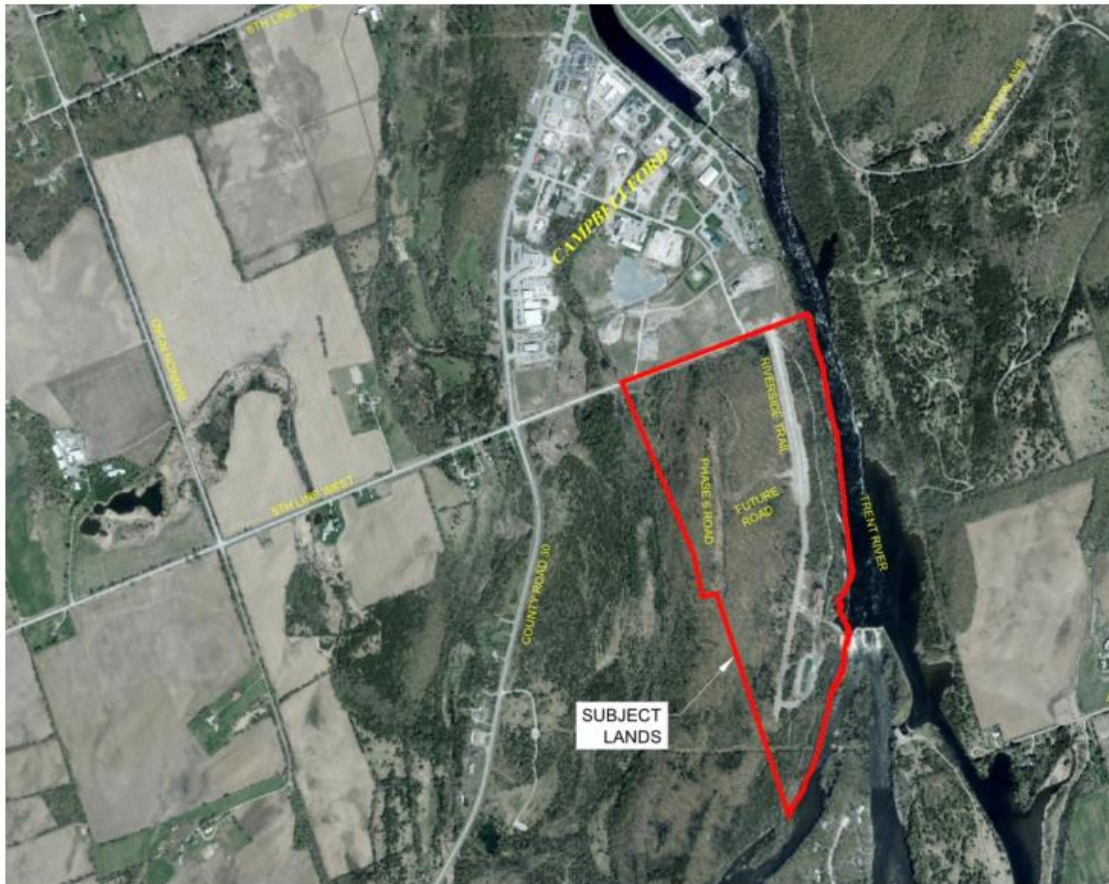
Dear Mr. Campbell,

Please consider this letter as a summary of our comments regarding Northumberland County's on-going comprehensive review of the Official Plan, specifically with respect to Growth Management.

In review of the draft Growth Management Official Plan Amendment (OPA) dated April 24, 2024, it is to be noted that Section 4 outlines that the intent for this amendment is to include **modifications to the boundaries of Campbellford and Hastings Urban Areas to ensure that they align with existing and potential development areas.**

Further, and in review of the presentation provided at the June 5, 2024 statutory public meeting, it is further identified that minor changes are proposed to multiple settlement areas to **"include already developed lands that are functionally related to the settlement area into the settlement area"**.

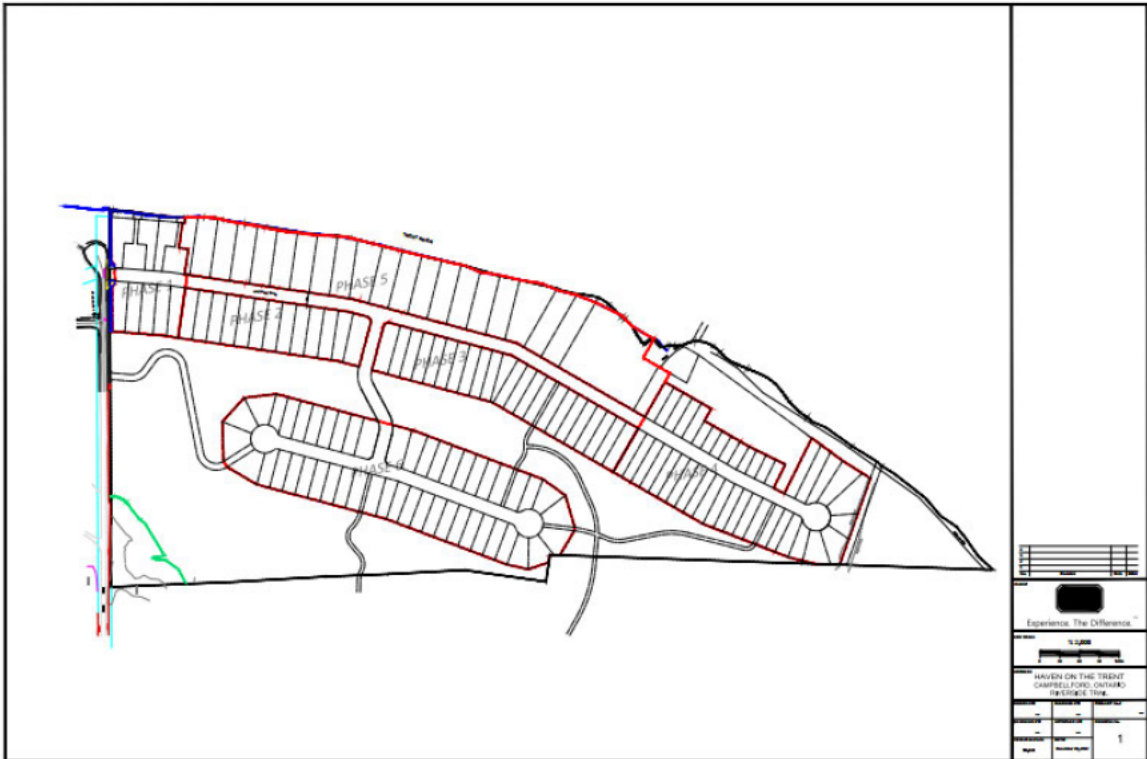
Sifton Properties Limited (Sifton) is the owner and developer of lands located south of the existing urban area settlement boundary of Campbellford as identified in Figure 1, commonly known as Haven on the Trent Subdivision, and herein known as the "subject lands".



The subject lands are designated as Rural Area per Schedule A of the Northumberland County Official Plan (2016). Per Section 2.7.1 of the Growth Forecasts and Urban Land Needs Analysis (LNA) prepared by Watson and Associates, in association with Meridian Planning dated November 24, 2021, rural land is to accommodate uses that are not appropriate in settlement areas such as resource-based activities and recreational activities. Section 2.6.1 of the LNA stipulates that urban areas include settlement areas that have full municipal servicing and Section 2.7.1 notes that rural settlement areas include existing Hamlets or similar existing small settlement areas that are long established in the Official Plan and further, are typically serviced by individual, private, on-site water and/or private wastewater systems.

The subject lands have been recognized for residential development at the municipal level for over 20 years. The subject lands were designated in the previous Seymour Township Official Plan as Village Community, which permitted residential development. Permissions for

development of the subject lands for residential uses were then carried forward into the Trent Hills Official Plan established in 2001. A series of development approvals have since been obtained applicable to the subject lands over a period of 18 years, resulting in a low-density residential community comprised of 149 single detached dwellings units, to be developed over six phases, of which 30 units have been constructed to date (June 2024). A conceptual phasing plan is provided in Figure 2, which also identifies the general lotting layout for the development aligning with existing development approvals.



Of the six phases of development, municipal servicing, inclusive of sanitary sewers and watermains, have been installed to provide service to Phases 1 through 4. A sanitary pump station and forcemain were also installed a part of Phase 1 to provide capacity and services to the entirety of the subject lands. Further, a stormwater management facility was installed as part of Phase 1 to accept and treat stormwater runoff for the entirety of the subject lands. Understanding the subject lands are serviced by municipal infrastructure and thereby utilize municipal service capacity, the development has historically been accounted for in the urban growth allocation.

In review of Section 7.2 of the LNA, it has been identified that Northumberland County is forecasted to have a surplus of approximately 409 hectares of community area land to the year 2051, specifically within the Town of Coburg and urban areas of Campbellford, Brighton and Colborne.

While it is understood that no additional community area land is required to meet projected growth to 2051 within the urban area of Campbellford, **it is in our opinion that inclusion of the subject lands in the urban area settlement boundary of Campbellford would represent a minor modification for the purposes of recognizing existing development lands.**

Further, Policy B8 of the draft Growth Management OPA, stipulates that population and employment forecasts do not have an impact on the ability of the County and local municipalities to consider applications to develop lands that are within an urban area or rural area settlement boundary, provided the lands are designated for development. Although the lands are not located within an urban or rural area settlement boundary, this policy is applicable as the lands have been recognized for residential development for over 20 years and further, are subject to a series of existing development approvals. Inclusion of the subject lands into the urban area settlement boundary of Campbellford represents a logical extension of the urban area of Campbellford, providing for a range of housing choices that are serviced by municipal infrastructure (Policy B16).

Additionally, and in order to appropriately recognize existing development approvals, and provision of municipal servicing, an urban area designation should be applied to these lands, and reflected on Schedule X5: Campbellford Lands to be Designated Urban and Rural Areas.

In summary, we respectfully request the following:

1. That County Staff and Council incorporate the subject lands as identified in Figure 1 into the urban area settlement boundary of Campbellford; and
2. That County Staff and Council apply an urban area designation to the subject lands to appropriately recognize existing development approvals and provision of municipal services applicable to these lands.

We appreciate the opportunity to submit comments.

Sincerely,

A,


Alexandra Haasen
Project Manager, Planning and Development
Sifton Properties Limited

Cc: Jim Peters, Director of Planning and Development, Municipality of Trent Hills
Phil Masschelein, Senior VP Neighbourhood Developments, Sifton Properties Limited

Brenda Watson

July 11, 2024

Council Members

And

Dwayne Campbell
Land Use Planning & Inspection Services Manager
Northumberland County
campbelld@northumberland.ca

RE: Growth Management Official Plan Amendment – Request to be redesignated

Dear Council Members:

I am the owner of [REDACTED] in the Township of Hamilton. The property is located to the northeast of [REDACTED], known legally as [REDACTED]

I have owned the property since 1990. The property is approximately 111 acres in size. Over the years, we developed the southern portion of the property with a driving range, mini putt course and nursery. My son now operates his business from the property.

The northern portion of the property was used as a second driving range. We have never farmed the land ourselves but have previously leased some land to neighbouring farmers.

Northumberland County Official Plan Growth Management Amendment

Currently, Schedule A of the Northumberland County Official Plan designates the property as Rural Settlement Area to the south and Agricultural Area to the north.

Given the proximity to Highway 401 and an Arterial Road (Burnham Street North) the property is well suited to be redesignated from Agricultural Area to entirely Rural Settlement Area during this Official Plan Amendment. This would allow for future residential and employment development in an area that already partially designated Rural Settlement Area.

I look forward to discussing this with you further,

Sincerely,
Brenda Watson

Brenda Watson

July 11, 2024

Council Members

And

Dwayne Campbell
Land Use Planning & Inspection Services Manager
Northumberland County
campbelld@northumberland.ca

RE: Northumberland County Growth Management Official Plan Amendment – Request for Use as Hamlet as designated in Official Plan for Alnwick Haldimand

Dear Council Members:

I am the shared owner of [REDACTED]. The property is located south of the [REDACTED]

The property has been in the family for several decades. The property is approximately 21 acres in size. Over the years, the main home and two lots were severed from the property.

The property is zoned hamlet in the official plan. It is serviced land. The Lower Trent Conservation Authority has become involved with the land use and disallowed development. This has created a conflict for us as landowners as to the actual future use of the property.

This request is for review and confirmation of the hamlet zoning uses on this property in the growth plan amendment to resolve the current ambiguity on land use.

I look forward to discussing this with you further,

Sincerely,
Brenda Watson

cklow

Colborne

**SUBJECT
LANDS**

Lakeport

Land Use Designations

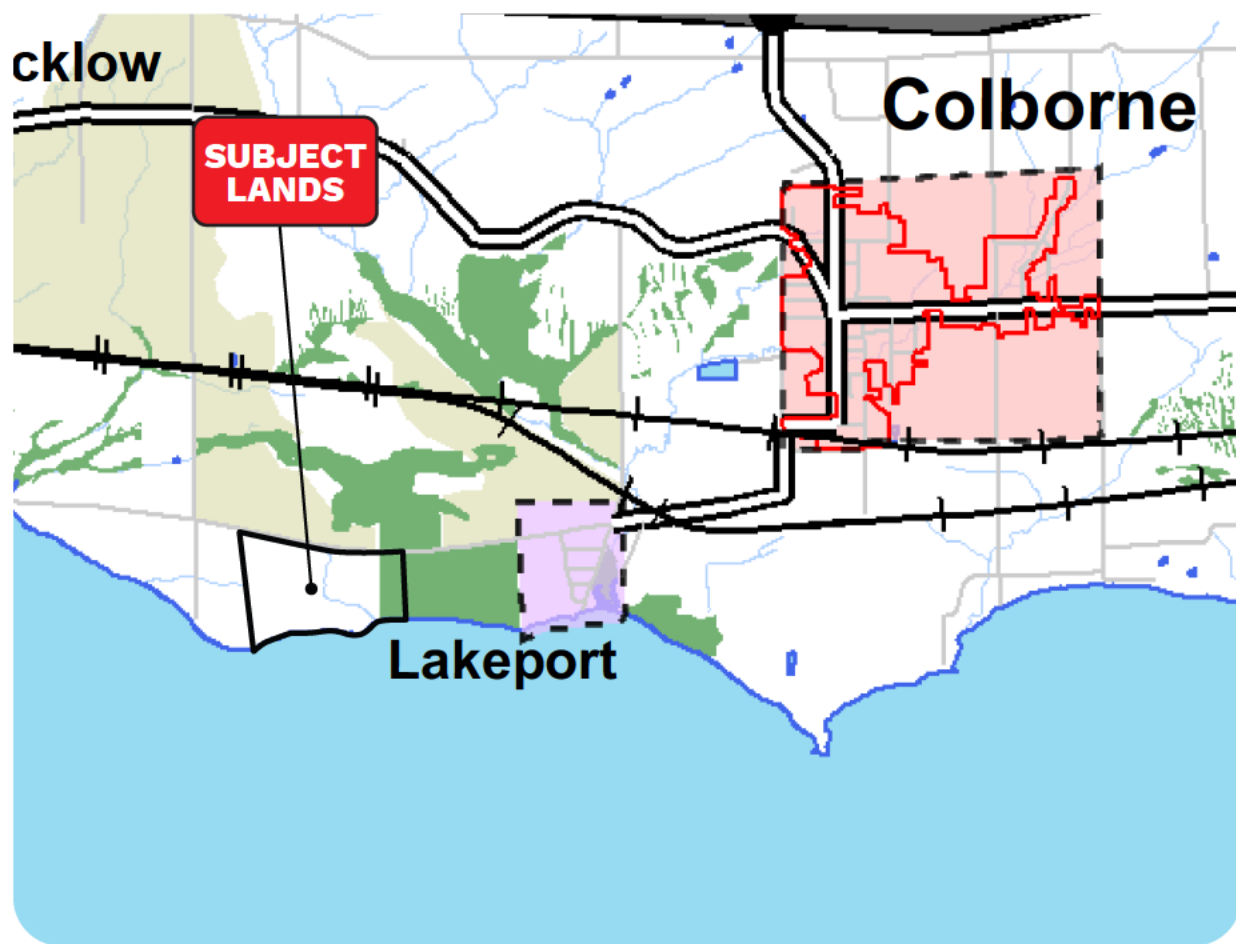
- Urban Area
- Rural Settlement Area
- Major Employment Area (Preferred Location)
- Agricultural Area
- Rural Area
- Oak Ridges Moraine
- Environmental Protection Area

Transportation Network Elements

- Highway 401
- County Road/Arterial Road
- Local Road
- Highway 401 Interchange
- Railway

General Map Elements

- Alderville First Nation
- Built Boundary
- County Boundary
- Provincial Park
- Trent Severn Waterway



July 12, 2024

Dwayne Campbell
Land Use Planning & Inspection Services Manager
Northumberland County
600 William Street
Cobourg, ON. K9A 3A5

Via email: campbelld@northumberland.ca

**Re: *Comments on Northumberland Municipal Comprehensive Review
on behalf of Landlab Inc.***

We are the planning consultants for Lakeport Beach Inc. (“Landlab”), owners of the properties located in the Township of Alnwick-Haldimand identified as Part of Lots 5, 6 and 7, Concession B and C, as identified on **Attachment 1** (herein after referred to as the “subject lands”).

On behalf of our clients we have been monitoring the County’s municipal comprehensive review (“MCR”) process to update the County Official Plan; we have reviewed the Growth Forecast and Urban Land Needs Analysis prepared by Watson & Associates dated November 24, 2021 and the draft Growth Management Official Plan Amendment (“OPA”) dated April 24, 2024. We have provided our comments summarized below, as well as a summary of the planning application history for the subject lands.

Planning Application History on the Subject Lands

Planning applications on the subject lands have been ongoing since March 2006. At that time, the lands were proposed to be developed as a 73 lot residential subdivision. The original application was put on hold while matters of shoreline ownership and access, among others, were addressed.

In 2015, the Township of Alnwick-Haldimand adopted a new Official Plan including a special policy applying to the subject lands which permitted a 68 lot residential subdivision plan for the subject lands, with associated environmental blocks and parkland dedication. The new Township Official Plan was approved by the Ministry of Municipal Affairs and Housing (“MMAH”) in November 2015, however the MMAH-approved version of the Official Plan removed the special policy for the subject lands. The Township enacted the MMAH modified version of the Official Plan on November 27, 2015, which was subsequently appealed by the former owner of the subject lands to the OMB. That appeal remains outstanding.

Landlab purchased the subject lands in 2021, and since then has been exploring the possibility of a modified development proposal, as described in Township of Alnwick-Haldimand Council Report #2021-PED34. Currently, the modified development proposal, known as “Lakeport Beach”, consists of approximately 700-800 units, with extensive environmental features and buffer blocks, as well as public access to the shoreline.

Comments on the County Official Plan and Land Needs Assessment

General

In considering that the subject lands have had an active application to propose residential development since 2006, that the Township of Alnwick-Haldimand had introduced a special policy to permit residential redevelopment on the subject lands, and that the consultations have been ongoing with the Township of Alnwick-Haldimand and the County of Northumberland over the past number of years with the current owner, we have concerns over the lack of clarity as to whether the development potential of the subject lands has been integrated into this MCR process, as discussed in more detail below.

Rural Development

In the draft Official Plan, there is a lack of direction provided as to how rural development has been considered as part of the overall growth management strategy for the County. The Growth Forecast and Urban Land Needs Analysis prepared by Watson & Associates Economists Ltd. dated November 24, 2021 finds that rural development is expected to represent 13% of the overall growth in the County to 2051, or 1970 units as per figure 5-4 and section 5.3.2, however only urban and built up areas are addressed in the intensification and greenfield development policies of Items 9 and 10 (OPA section B5 and B6). Further, the Land Needs Analysis allocates Community Area Land Needs based on population growth targets, and the OPA outlines minimum growth targets accordingly, however the OPA does not contemplate how additional growth would be allocated should the growth targets be exceeded.

The development of rural lands, such as the Lakeport Beach project, will be important in meeting the housing and development needs of the County and Province and should be thoroughly considered as part of this exercise. We recognize that this amendment does not propose the modification of policy C4 of the existing Official Plan, which speaks to the policies of development in rural areas, however there is no indication that the findings of the analysis have been considered with respect to rural development or that those existing policies are still relevant.

Further, there is a lack of information provided as to how the minimum housing forecasts across municipalities and densities interact with one another, if at all. More information should be provided as to how these targets are intended to be implemented across different land use designations. Does the achievement, or potential lack thereof, of population and density minimums at one site affect the developability of others?

We are supportive of the flexible approach taken with respect to the provision of servicing through Item 15 of the OPA, the proposed section B9. We encourage a continued constructive approach to be taken where different means of water and wastewater servicing (municipal, private communal, etc.) can be provided where proper justification is given.

Settlement Areas

The draft OPA proposes deleting section B18, which deals with modifications to rural settlement area boundaries and modifying section B11 by renumbering it as B7 and replacing all the existing text from B11 with a simple land needs table. One of the effects of these modifications will be the removal of all language within the Official Plan related to Settlement Area Boundary Expansions. Flexibility to amend Settlement Area Boundaries should be provided for in the Official Plan, where warranted and appropriately justified. Both the in-force Provincial Policy Statement and Growth Plan, as well as the draft Provincial Planning Statement provide direction on Settlement Area Boundary Expansions and as such, the County's Official Plan should also provide direction on the matter.

In recognizing that the language laid out in Items 6, 7, and 8 of the draft Official Plan Amendment state that the estimates provided are minimums, we believe that greater clarity should be provided as to how these minimums will be implemented and how they may interact with one-another, if at all, and how the County is prepared to address consideration for additional growth beyond the minimums.

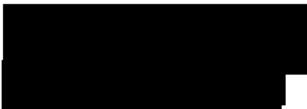
Final Remarks

We request that the draft Official Plan be modified to include the subject lands as an area for future growth, either as a special policy or as a settlement area. Further, we request that policies regarding Settlement Area Boundary Expansions be included in the Official Plan, as discussed above.

As Landlab has an active application and is in the process of advancing their Lakeport Beach development proposal, we ask that both Bousfields and Landlab be kept informed of the updates on the MCR process (including notification of community and public meetings) and be added to the MCR Project Circulation List. We would also be happy to meet with staff to discuss our comments and request for modifications to the Official Plan.

Thank you in advance for your consideration and we look forward to working with you through this process. Please do not hesitate to contact the undersigned if you have any questions.

Yours truly,
Bousfields Inc.



Emma West, MCIP, RPP

Cc. Client



From: [REDACTED] on behalf of [Northumberland Blue Dot](#)
To: [Campbell, Dwayne](#)
Subject: Fwd: Growth Plan official Plan Amendment Consultants' Reports submission
Date: Thursday, July 11, 2024 11:27:55 PM

CAUTION: External E-Mail

Dear Dwayne Campbell and the Planning Committee of Northumberland County,

We make this submission in opposition to several of the recommendations in the Consultants' Reports dealing with proposed use of prime active agricultural land in Northumberland County for community (residential) use and employment(industrial) use. Further, we oppose the decrease in intensification targets from 40 % to 17% as recommended in the report.

We rely on the reasons given in our presentation before the committee on June 10. The farmland in our county is very limited and is needed to produce food and agricultural produce for food security and our local economy. Since 2016 the total acreage identified as farmland in Northumberland County decreased by 28,160 acres. (VITAL SIGNS report, 2024) The Consultants' Report, if accepted and implemented, will add over 500 acres of our best and most productive flat farmland to this number.

The loss of 319 acres of farmland daily in Ontario, cannot happen here for the purpose of residential and industrial development just because those recommended parcels are owned by developers or owners wishing to develop them. These people should not be directing our growth plans. What other alternatives were considered than building on prime agricultural land? Please describe the process of selection. Port Hope was planning to purchase the Wesleyville property. This solution should be included. If the agricultural lands on the west side of Port Hope and Grafton are developed, the next time another 500 acres will be considered, and the urban sprawl our farmers and other taxpayers fear will be a reality. There is currently no regulatory protection of our agricultural land similar to the Greenbelt, so we depend on Northumberland County Council to protect our farmland. The proposed lands are and must remain permanent agriculture.

It is difficult to accept that over the next 24 years there will not be any other land available for the proposed 500 plus acres needed for residential and industrial growth within our existing urban areas. We acknowledge the current need for housing, particularly affordable housing and accommodation in the built up areas of the county. Therefore it is puzzling the recommendation is to reduce intensification from 40 % to 17 %. The reason given, "The results of this M.C.R. identify that this target is not considered to be realistic based on historical development trends and anticipated demand for housing within the built-up areas (B.U.A.) across the County." is not sufficient in details nor rational in order to make that recommendation. Surely currently and over the next 24 years brownfields, underdeveloped lots, infill development, conversions and expansions in Port Hope and other urban areas can be utilized to create more units to meet anticipated growth demands. If the intensification target is

decreased more non-urban land will be required and this is not acceptable to us.

We trust our Planning staff, Committee, and Council will not accept these recommendations and will consider maintaining the existing intensification targets.

Faye McFarlane, Tony Walker, Judy Smith, Bruce Bellaire, Micheal Perley
Blue Dot Northumberland



**Ganaraska Region
Conservation Authority**

2216 County Road 28
Port Hope, ON L1A 3V8

Phone: 905-885-8173
Fax: 905-885-9824
www.grca.on.ca

MEMBER OF
CONSERVATION ONTARIO

July 12, 2024

Mr. Dwayne Campbell, MCIP, RPP
Manager, Planning and Community Development/Chief Planner
Northumberland County
600 William Street
Cobourg, ON K9A 3A5
campbelld@northumberland.ca

Re: Northumberland County Draft Growth Management Official Plan Amendment

Dear Mr. Campbell,

The Ganaraska Region Conservation Authority (GRCA) is pleased to provide the following comments on the Northumberland Draft Growth Management Official Plan Amendment (OPA).

The initial comments will focus on the OPA policies with a later focus on the supporting technical documents.

Policy - Part B “The Amendment”

Section B6 Minimum Greenfield Density Target

- Please revise Subsection b) to indicate “The minimum density target shall exclude *natural heritage features* and *natural hazards* (including flooding and erosion hazards), provided development is prohibited in these areas.” There are several types of natural hazards regulated under the *Conservation Authorities Act*, in addition to floodplains, that should also be excluded from the application of minimum density targets. GRCA will require setbacks from these natural hazard features.

Section B9 Water and Wastewater Servicing

- Please reword and expand this section to be more in keeping with Section 3.6 of the 2024 Provincial Planning Statement (PPS). In particular:
 - Include the requirement to integrate the planning of services with source protection planning as per Subsection 1 f) of Section 3.6 of the PPS.
 - Include ‘stormwater’ in the title of the section of the OPA and add subsection

8 from Section 3.6 (excerpt below) as stormwater is a critical element of servicing:

8. *Planning for stormwater management shall:*

- a) *be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;*
- b) *minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;*
- c) *minimize erosion and changes in water balance including through the use of green infrastructure;*
- d) *mitigate risks to human health, safety, property and the environment;*
- e) *maximize the extent and function of vegetative and pervious surfaces;*
- f) *promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and*
- g) *align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.*

General Comments on OPA

- Schedules X3 and X4 show the same areas, however one is for the lands to be designated Urban Area and the other refers to lands to be designated Major Employment Area.
- Watershed plans and subwatershed studies are mentioned in several sections of the County's Official Plan. We strongly recommend that the County reiterate and reinforce the important role of subwatershed studies by incorporating the language from all of Section 4.2 of the 2024 PPS, with particular emphasis on subsections 2 through 5.
- Subwatershed planning has been taking place in Ontario for over thirty years and we encourage the County to include language in the OP and OPA documents requiring that subwatershed studies and secondary plans be completed for all development areas of appreciable size (i.e. greater than 30 – 40 hectares). Section 1.5 of the 2022 Draft Subwatershed Planning Guide describes the relationship of watershed planning to land use and infrastructure planning:

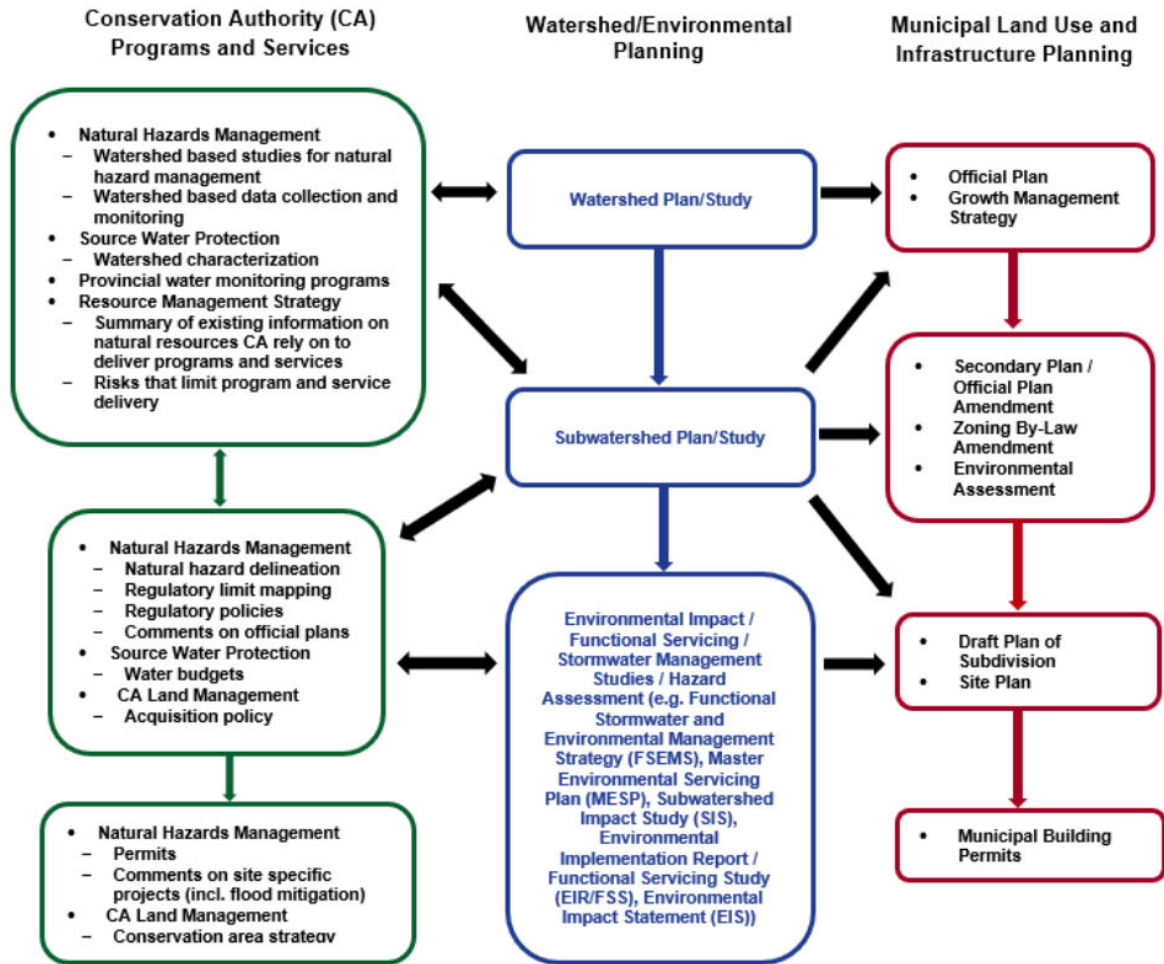
Watershed planning informs broad scale municipal planning processes, including decisions on allocation of growth, planning for water, wastewater and stormwater infrastructure, and the identification of water resources within the watershed. Subwatershed planning informs site-specific development applications and official plan amendments, site plans, zoning, plans of subdivision, secondary plans, master environmental servicing plans and environmental approvals. Some planning authorities develop subwatershed plans to inform all planning decisions for a growing area. This may also be required to meet provincial policies provided that the subwatershed plan contains the appropriate information to inform planning decisions.

- From the “Subwatershed Planning Guide (Draft) January 2022” the benefits of subwatershed planning include:
 - Protecting, improving, or restoring the quality and quantity of water in a watershed.
 - Mitigating potential risk to drinking water sources.
 - Mitigating potential risk to public health or safety or of property damage from flooding and other natural hazards and the impacts of a changing climate.
 - Facilitating an integrated and long term planning approach at a watershed scale.
 - Identifying water resource systems, which are necessary for the ecological and hydrological integrity of the watershed.
 - Clarifying roles and responsibilities among municipalities, provincial ministries and conservation authorities.
 - Streamlining planning processes and reducing duplication and delays.
 - Facilitating complete communities.

A link to the Subwatershed Planning Guide can be found here:

<https://ero.ontario.ca/notice/019-4978>

- Figure 2 from the Subwatershed Planning Guide illustrates the inter-relationship between the various planning processes that local agencies perform and highlights the role that watershed and subwatershed planning plays in the process. See the following flow diagram:



- The expansion area for the Municipality of Port Hope is focused to the west. Staff request additional justification and/or discussion for this option and a review and summary of the other options that were investigated. Furthermore, GRCA is unclear if other expansion concepts have considered preliminary feasibility assessments for servicing options and associated cost estimates.
- GRCA notes that, when requesting documents from the County, a cost estimate was provided for the servicing of the lands north of Telephone Road. Please advise whether a similar cost estimate was prepared for the proposed residential expansion lands to the west. If so, please provide to GRCA. If not, it is recommended that such an analysis and cost estimate be completed.

Review of Technical Documents

North South Environmental – Preliminary Constraints Assessment – Port Hope Settlement Area Lands

- The limit of regulated natural hazards were acquired from GRCA’s online screening tool and is not an accurate depiction of all natural hazard limits. These limits need to be refined in consultation with GRCA staff.

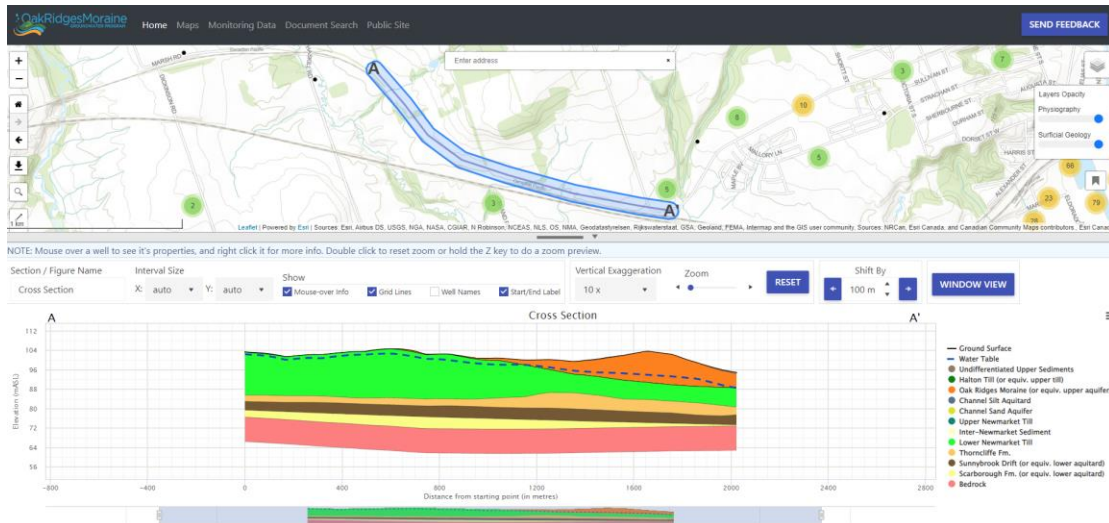
- Valley slopes – GRCA does not support construction on, within or over a valley slope, and will require setbacks from the top of slope for new construction or lot grading. This includes any overhangs or cantilevered structures and is to ensure that new development is protected from potential slope instability or erosion and to protect the environmental integrity of the valley system. GRCA may require a geotechnical investigation to determine the extent of the erosion hazard. The erosion hazard of the watercourse must also be considered. GRCA may require an additional access allowance of 6m from the top of bank or long term stable slope line (whichever is greater). No SWM facilities will be supported within the hazard lands or required setbacks. See mapping excerpt below.



- Floodplains – Although not mapped, all watercourses have an associated floodplain. There are watercourses on the subject properties. GRCA’s primary concern is the protection of life and property from the flood hazard. GRCA’s concerns for new construction would include maintaining setbacks to address channel bank erosion, sediment control during construction, and no negative impact to Regulatory Storm Floodplain. It will be necessary to determine the extent of the floodplain of these watercourses to establish limits of development. All SWM facilities should be outside the floodplain and no development (including lot lines) can extend into the floodplain.
- Fisheries data did not include existing brook trout records for tributaries of Brands and Little’s Creek. These features are supported by groundwater inputs/upwellings and would need to be clearly identified and protected through the development process. Additionally, any stormwater management measures draining to these features would need to incorporate thermal mitigation measures.
- Stormwater management constraints/criteria needs to be established through a subwatershed study and secondary plan process. This would typically include unitary volume and discharge rates for flood control, erosion control and water quality control (including thermal mitigation) measures, recommended Low Impact Development (LID) best management practices, etc.

GM Blue Plan – Feasibility of Servicing Future Settlement Expansion Area West of Port Hope

- Wastewater Option 1 vs Option 2 – GRCA has reviewed the LiDAR-based digital terrain model (DTM) for the area and notes that the creek invert is closer to 119 meters above sea level (masl). This is approximately 4 metres lower than the 123 masl that was estimated in the GM Blue Plan assessment. This lower invert creates physical challenges to the servicing of the triangular area in the northwest portion of the proposed settlement expansion area and points to Option 2 (new pumping station) as the more viable servicing option.
- GRCA has concerns with the depth of the sanitary sewer trenches along the south limit of the proposed expansion area. In reviewing the hydrogeology of the area, the water table appears to be rather high which is a significant concern for GRCA (see blue dashed line in cross section figure below).



- Sanitary sewer trenches are often in excess of 4 metres in depth and could potentially steal or divert groundwater away from local watercourses and fish habitat. Mitigation measures, such as trench plugs, may need to be incorporated into design concepts for this area. A detailed understanding of local hydrogeology/groundwater features, potential development impacts, and mitigation measures need to be studied through a subwatershed study process.

North South Environmental – Preliminary Constraints Assessment for Settlement Area Lands

- The limit of regulated natural hazards shown for the major employment lands north of Telephone Road, depicted in Figure 5, were acquired from GRCA’s online screening tool and are not an accurate depiction of all natural hazard limits. These limits need to be identified and refined in consultation with GRCA staff.
- Stormwater management constraints/criteria for the area north of Telephone Road needs to be established through a subwatershed study and secondary plan process. This would typically include unitary volume and discharge rates for flood control, erosion control and water quality control (including thermal mitigation) measures, recommended Low Impact Development (LID) best management practices, etc.

Source Water Protection Comments

As part of the Source Protection Plans (SPPs), the Source Protection Committees (SPCs) delineate Intake Protection Zones (IPZs) around surface water intakes (e.g. lakes, rivers) that serve as municipal drinking water sources. The IPZs are defined based on the time it would take for a contaminant to reach the intake under various flow conditions. The planned development, both to the north and west of Port Hope, is in the IPZ-2 vulnerable area as depicted in the image below.



The IPZ-2 zone represents the secondary protection zone around a surface water intake for a municipal drinking water system. It is the area within which a contaminant could reach the intake within a 2-hour time of travel under an extreme event. As such, when new developments are planned within that area, several considerations come into play:

- Evaluate the potential for the development to introduce new contaminant threats or increase risks to the drinking water source.
- Compliance with Source Water Protection policies is required through the municipal planning and approvals process. This could include restrictions on certain land uses, requirements for spill prevention plans, and enhanced monitoring/reporting near the intake.
- Particular attention should be given to transport pathways that may be constructed when the area is developed. Under the *Clean Water Act*, 2006 in Ontario, a transportation pathway is defined as:
 - "A natural or constructed conduit or channel that could facilitate the movement of contaminants from a source to a drinking water system."
- Some key aspects of how transportation pathways are defined under the legislation include:
 - **Constructed pathways:** These are man-made structures or infrastructure that can facilitate the movement of contaminants. Examples include roads, railways, sewers, culverts, ditches, and underground utilities.
 - **Conduits and channels:** The pathways do not necessarily have to be fully enclosed or pipe-like. Open channels, overland flow routes, and preferential flowpaths are also considered transportation pathways.
 - **Facilitating contaminant movement:** The key criteria is the pathway's

ability to move contaminants from a source to a drinking water system, such as a surface water intake. This includes the potential for spills, leaks, runoff, or other means of contaminant transport.

- The identification and assessment of transportation pathways is a critical component of the source water protection planning process under the *Clean Water Act*. It helps guide the development of policies, risk management measures, and emergency response protocols to safeguard drinking water sources.
- As noted previously, any potential risks to drinking water sources would need to be identified and mitigated through a subwatershed study process.

We trust that the above information is of assistance. GRCA staff would be pleased to discuss these comments in greater detail. Please contact the undersigned if you have any questions or would like to discuss these comments.

Respectfully submitted,



Ken Thajer, MCIP, RPP
Planning and Regulations Coordinator



Cory Harris, P. Eng.
Watershed Services Coordinator

From: [REDACTED]
To: [Campbell, Dwayne](#)
Subject: Northumberland Official Plan Amendment - public input
Date: Friday, July 12, 2024 2:15:28 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: External E-Mail

Good day Dwayne,

I suspect you and the County are looking forward to next steps after the public consultation phase of amending the Official Plan as it relates to addressing the Province's mandate to accommodate anticipated increases in population and to support job growth.

The following note offers thoughts on:

- a. Part 1 – Coordination and cost-sharing of local Official Plan updates
- b. Part 2 – Development activity to minimize disruption to area residents and businesses during construction

Further to my request that the County complete and make available an assessment of the proposed [Official Plan Amendment \(Growth Management phase\)](#) against the [UN Sustainable Development Goals](#) to identify specific gaps or opportunities that could be addressed in a final version of the Amendment, I offer the following observations:

Northumberland County:

- Vision Statement: ***“To bring together people, partnerships and possibilities for a strong and vibrant Northumberland County.”***
- Mission Statement – ***“To be a best practices leader in county government, and a collaborative partner with member municipalities and community partners.”***

So, against the backdrop of forecast population increases and the Province's direction to create more housing/employment, governments at the local level are charged with managing that growth collaboratively, which improves their residents' economic wellbeing and in a socially responsible manner.

Part 1 – Coordination and cost-sharing of local Official Plan updates

While the proposed Official Plan addresses 'where' development/changes to accommodate growth would be, I have heard considerable concern over who would bear the capital costs of any such development. The question becomes 'how' any future planning for development is prioritized and funded.

The first barrier is funding related to any resources required to update each “lower-tier” Plan, Secondly, there is a risk of negatively affecting other municipalities in Northumberland County by having each Plan updated independently.

We in Northumberland have a relatively small tax base. As local councils update their Official Plans to align with the County, there will be “**significant one-time direct compliance costs for municipalities to implement the adjusted official plans and official plan amendments and incorporate this direction into downstream planning decisions (e.g., zoning by-laws)**”.(ref 1). Distribution of costs associated with Planning document amendments (public engagement or 3rd party analysis) becomes more onerous as the municipality population size decreases, by virtue of their smaller tax base, and the Province’s direction that “there would be no annual administrative costs to businesses anticipated from these proposed changes”.(ref 1) While each municipality is certainly free to amend their Plans in a direction that meets their own requirements, it would appear there is a cost-sharing and mutually supportive opportunity in terms of updating each official plan at the local level.

Therefore, I propose that the County include in the Official Plan Amendment that: **Northumberland County lead an implementation team, comprised of representatives from each of the seven municipalities and Alderville First Nation to coordinate required changes in their respective local Plans, with updated Plans for all municipalities to be presented to each municipality for approval by the end of 2025. Costs to complete updated Plans to be shared equitably amongst all of Northumberland’s municipalities in a manner to be determined by the team.**

Expected benefit:

- Improved coordination of development in a manner that complements each municipality’s strategic objectives
- Better ability to address cross-county environmental impacts by any development
- Limited period of time to put revised Planning requirements in place, reducing uncertainty for prospective developers, business owners and residents.

Part 2 – Development activity to minimize disruption to area residents and businesses during construction

According to the draft Official Plan Amendment:

“In cases where major development is proposed in new development areas, it shall be demonstrated that:

- i. The proposed development will generally serve as a logical extension to the existing built-up area, is compact and has a mix of uses to allow for the efficient use of land, infrastructure and public service facilities;***
- ii. The proposal will contribute to the availability of a range of housing choices (e.g. density, form, and price) in new development areas;***
- iii. All of the other infrastructure and public service facilities required to service the development is available or to be provided, with such infrastructure and public service facilities being used as efficiently as possible; and***
- iv. Access is provided in a manner that supports the provision of essential emergency services, active transportation, efficient transportation patterns, and/or linkages with adjacent existing or planned development.”***

Given the less than desirable practices by developers and their contractors (Port Hope residential developments), and in keeping with [Construction Industry Institute \(CII\) best practices](#), I would strongly advocate that the Amendment contain requirements for municipalities to include, in any property development proposal, (during permit application, tender submittal and, finalized prior to award) how the constructor will address:

1. Advanced Work Packaging
2. Alignment (of objectives)
3. Benchmarking and Metrics
4. Change Management
5. Constructability
6. Disputes Prevention and Resolution
7. Front End Planning
8. Implementation of CII Research
9. Lessons Learned
10. Materials Management
11. Partnering
12. Planning for Modularization
13. Planning for Startup
14. Project Risk Assessment

15. Quality Management
16. Team Building and
17. Zero Accidents Techniques.

I acknowledge that these practices have been developed by large constructors but, to support innovation, stewardship and best-practice reinforcement, adoption of methods which are proven to reduce negative impacts should be part of any Development Plan. Requirements for construction material and equipment staging, temporary services which do not negatively impact existing residences or businesses and active risk mitigation will reduce the end-user cost.

Proposed: Developers shall include proposals for incorporating best-practices in any permit application. Granting of Permits shall consider the adequacy of proposed methods against criteria established by each Municipality. Where the scale of a development exceeds a Municipality's capacity for proper control and oversight, developers shall be required to provide in-house or third-party monitors (within speciality disciplines) reporting to the Municipality. Clear accountability for meeting specified requirements is essential for successful project outcomes.

As a new-home buyer in Port Hope – I was appalled by the lack of accountability by the Builder for errors and sub-par methods of construction. I am not alone in this experience. Being able to demonstrate positive relationships between various stakeholders and having durable supporting infrastructure in any development will go a long way toward promoting Northumberland as:

- Innovating for Service Excellence
- Igniting Economic Opportunity
- Fostering a thriving Community
- Propelling Sustainable Growth and
- Championing a vibrant future. (ref [Performance Dashboard](#))

Thank you for your consideration. We look forward to next steps.



References:

1. <https://www.ontariocanada.com/registry/view.do?postingId=46513&language=en>
2. [Draft Growth Management OPA, item 10, pg 8](#)

Frank Ipsen

