



Sent by Email

February 11, 2026

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Municipality of  
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**Re: Initial Project Description for the New Nuclear at  
Wesleyville Project**

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Dear Impact Assessment Agency of Canada,

The Regional Municipality of Durham ('Durham Region') appreciates the opportunity to comment on the Initial Project Description for Ontario Power Generation's (OPG) proposed New Nuclear at Wesleyville Project. We support Ontario's efforts to expand clean, reliable electricity generation capacity and we recognize the important role that new nuclear development will play in meeting the province's long-term energy needs. Our staff have participated in early interviews to support OPG's socio-economic assessment of the Wesleyville Project and have invited OPG to brief Regional Council as part of our ongoing commitment to participation in the nuclear sector.

Our review of the 350-page Initial Project Description identified several opportunities to address gaps to the assessments "preliminary real and potential impacts." Although the Initial Project Description is an early-stage planning document, its framing establishes the study areas, the jurisdictions considered affected, and ultimately the scope of the Impact Assessment. Clear and accurate geographic and jurisdictional assumptions at this stage are essential.

The Region is concerned to see that neither Durham Region nor Clarington is identified in Section 4.3.4 as a jurisdiction with powers, duties, or functions related to the assessment of potential effects. Both levels of municipal government share environmental, labour market, housing, transportation, public health and emergency response responsibilities (including police, paramedic services and fire services) with the Wesleyville area, and both will hold legislated obligations

directly related to the Wesleyville Nuclear Generating Station under Ontario's nuclear policy and Provincial Nuclear Emergency Response Plan (PNERP). With the proposed generating station located approximately one kilometre from our communities, any transboundary effects will directly affect our jurisdictions.

**Accordingly, we request formal recognition of Durham Region and Clarington as affected jurisdictions within the Impact Assessment process.**

We also note key differences between the framing of the Wesleyville Initial Project Description and the approach used for the Bruce C Project. Bruce Power situates its project within a broader regional context, acknowledging shared water bodies, transportation networks, labour and housing markets, and cumulative environmental systems. In recognition of the regional impacts of a project of this scale, Bruce Power has also provided multi year funding to Bruce County, The Municipality of Kincardine, and the neighbouring Town of Saugeen Shores to support their meaningful participation in the IA process, including funding for new staff positions at each municipality and studies related to workforce impacts and growth management.

In contrast, OPG's Wesleyville Initial Project Description adopts a much narrower scope focused primarily on the Municipality of Port Hope and Northumberland County, without adequately extending the assessment lens or funding to adjacent Durham Region and Clarington despite the immediate proximity and high degree of regional interconnectedness.

A narrow framing risks underestimating socioeconomic effects, limiting study areas, and overlooking cumulative effects along the Lake Ontario nuclear corridor. These are not abstract risks—they reflect how environmental, labour, transportation, and emergency management systems function in practice. Early and ongoing engagement will allow our municipalities to understand expected local impacts, identify pressures on infrastructure and services, and position our communities to access upper-level government programs designed to support economic development and regional resilience.

The attached document outlines the key gaps in the Initial Project Description, including emergency management responsibilities, financial impacts, land use and planning implications, cross-boundary effects, geological considerations, shoreline alteration, nuclear waste management, and cumulative impacts. Each of these areas requires early, clear, and comprehensive assessment to ensure an accurate understanding of how the project will interact with municipal systems and responsibilities.

Durham Region remains supportive of nuclear generation as a key component of Ontario's clean, reliable energy system, and we have confidence in OPG's proven ability to safely construct and operate nuclear facilities. Our intent is to support a strong and complete Impact Assessment by offering constructive analysis and by ensuring that the assessment reflects the realities of regional infrastructure, service

delivery, and community well-being. Given our proximity to the project site, the statutory responsibilities that will arise directly from this development, and the clear cross-boundary environmental and social interactions involved, Durham Region and Clarington must be fully considered as affected jurisdictions throughout the Impact Assessment process.

Sincerely,  
<Original signed by>

John Henry

Regional Chair and CEO

Attachment: Regional Municipality of Durham Assessment of the Initial Project Description for the proposed New Nuclear at Wesleyville Project

# Regional Municipality of Durham Assessment of the Initial Project Description for the proposed New Nuclear at Wesleyville Project

## Introduction and executive summary

The Regional Municipality of Durham ('Durham Region') has reviewed Ontario Power Generation's Initial Project Description for the proposed New Nuclear at Wesleyville Project. While the Initial Project Description is an early-stage planning document, its framing determines study boundaries, affected jurisdictions, and ultimately the scope of the federal Impact Assessment. Our review identifies several significant gaps in how the Initial Project Description interprets and presents the "preliminary real and potential impacts of the project."

Given Durham Region and Clarington's proximity (approximately one kilometre from the proposed generating station) and the statutory responsibilities both municipalities hold under provincial nuclear emergency planning and service-delivery frameworks, the Initial Project Description must recognize our jurisdictions as directly affected. The narrow geographic framing currently applied overlooks the integrated environmental, transportation, labour, housing, emergency management, and infrastructure systems that connect our communities with the Wesleyville area.

Key gaps include:

- **Emergency Management:** Large portions of the legislated emergency planning zones fall within Durham Region and Clarington, creating mandatory operational responsibilities that must be assessed within the federal process.
- **Financial Impacts:** Durham and Clarington will bear significant service and infrastructure costs but will not receive property tax or payment-in-lieu revenues from the facility, resulting in fiscal imbalance.
- **Land Use and Planning:** Required Canadian Nuclear Safety Commission (CNSC) restrictions will limit development potential on lands within the Automatic Action Zone, including privately owned parcels.
- **Cross-Boundary Effects:** Construction-related impacts, transportation pressures, workforce in-migration, and active transportation disruptions will extend into Clarington and Durham Region and require regional assessment.
- **Cumulative Impacts:** Durham already hosts extensive nuclear infrastructure, necessitating a broader cumulative effects lens.

- **Geology and Shoreline Alteration:** Legacy subsurface features and potential shoreline changes warrant further clarification due to interactions with nearby regulated sites.
- **Nuclear Waste Management:** Any scenario involving transport, processing, or storage of waste within Durham Region requires early, formal engagement.
- **Cooling Towers:** Durham Region Council has a long-standing position opposing design options with cooling towers as a matter of social and economic impact.

Across all topic areas, the overall concern is that the current Initial Project Description does not sufficiently reflect the interconnected regional context or the statutory obligations that will fall to Durham Region and Clarington as neighbouring municipalities with established nuclear-related responsibilities. A regionally scoped assessment, supported by appropriate baseline data, modelling, and consultation, is required to ensure accuracy, transparency, and alignment with both municipal and federal expectations.

The following sections provide a more detailed analysis of key issues identified in OPG's assessment of "preliminary real and potential impacts of the project." This summary is intended to support a more complete and accurate understanding of the project's potential effects and to reinforce the need for these considerations to be addressed early in the Impact Assessment process.

## **Emergency Management**

Municipalities have defined statutory responsibilities under the Provincial Nuclear Emergency Response Plan (PNERP). These responsibilities include the provision of evacuation support, reception centres, public health programs such as potassium iodide distribution, emergency communications, police, paramedic services, fire services, and emergency social services. For Pickering Nuclear Generating Station and Darlington Nuclear Generating Station, Durham Region is also responsible for operating and maintaining the nuclear public alerting system, including nuclear sirens and auto dialler system due to specific nuclear planning zone responsibilities. A significant portion of the legislated emergency planning zones for the Wesleyville station, including the automatic action zone and detailed planning zones, are within Durham Region and Clarington and will have specific emergency management requirements. These are not optional or speculative obligations. Emergency planning assumptions, service demands, infrastructure requirements, and cost implications must be assessed during the Impact Assessment stage. They are not within the scope of the CNSC's mandate.

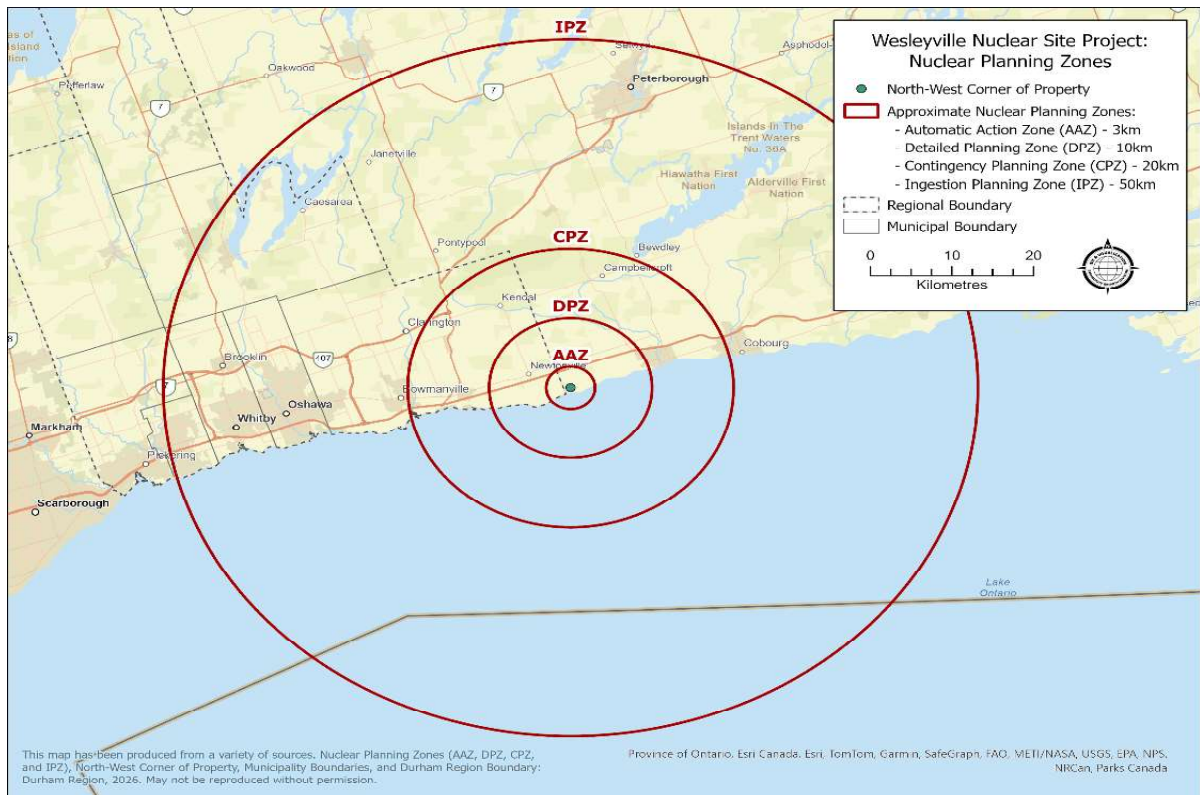


Figure 1: An estimate of the Automatic Action Zone (AAZ), Detailed Planning Zone (DPZ), Contingency Planning Zone (CPZ), and Ingestion Planning Zone (IPZ) for the Wesleyville Nuclear Generating Station.

**Financial Impacts: Service impacts**

Durham Region and Clarington will bear major infrastructure, communications, and service delivery costs associated with the construction and operation of the Wesleyville station but will not receive property tax or payments in lieu (PILs) revenue from the facility. The Municipality of Port Hope and Northumberland County will receive the fiscal benefit, while Durham Region and Clarington will absorb a disproportionate share of operational responsibility. The Impact Assessment must acknowledge this financial asymmetry and assess its implications for fiscal equity and economic impacts on Durham Region and Clarington. Impact mitigation mechanisms must address the gap between operational obligations directly attributable to this project and its revenue base. Project-related funding needs to be provided to all municipalities with statutory responsibilities.

Durham Region has consistently advocated that communities should not shoulder the operational burden of federally regulated projects without corresponding financial arrangements. The Impact Assessment must consider the need for formal impact mitigation and service arrangements with affected municipalities including Clarington and Durham Region, such as a Host Community Agreement or Regional Impacts and Services Agreement, as a potential mitigation measure.

If you require this information in an accessible format, please contact Communications and Engagement at [CorporateCommunications@durham.ca](mailto:CorporateCommunications@durham.ca) or 311, extension 3743.

## **Financial Impacts: Historic fiscal arrangements with existing nuclear host communities**

As Ontario enters a new nuclear build cycle, it is critical that historic fiscal arrangements that limited the municipal benefit of hosting nuclear generation not be replicated. Past electricity-sector financing structures directed payments associated with nuclear facilities, including payments in lieu of property taxes, toward servicing provincial liabilities arising largely from earlier nuclear construction cost overruns. While this approach addressed provincial financial pressures at the time, it resulted in host communities accommodating major provincial infrastructure while receiving less direct fiscal benefit than is typical for large industrial facilities.

Durham Region views the current period as a policy transition point. New nuclear development, including the proposed Wesleyville facility, must be financed through structures that do not reintroduce mechanisms whereby project costs, overruns, or associated liabilities are managed in ways that continue to direct debt repayment to host community property taxpayers. Payments associated with new nuclear facilities should flow to host municipalities in a manner comparable to industrial property taxation, reflecting the infrastructure, land use, emergency services, and growth management responsibilities borne locally.

The Province has recently recognized the importance of municipal hosting arrangements through dedicated funding commitments to new host communities in connection with new nuclear proposals. Durham Region supports this direction but emphasizes that all host municipalities must be equitably included in emerging fiscal and funding frameworks. This matter is raised as a question of municipal fiscal sustainability and intergovernmental fairness, not as a matter of support for nuclear generation, which remains an important component of Ontario's clean energy future.

## **Land Use Restrictions**

Restrictions on future development of sensitive land uses (e.g., residential development) within the Automatic Action Zone will have implications for affected area municipalities and immediate landowners. While a portion of the lands within this area in Clarington is owned by Atomic Energy of Canada Limited (AECL), there are also privately owned lands that would be subject to new constraints on permitted uses, as required by the CNSC. These restrictions will require amendments to Clarington's Official Plan and will limit the types of development or land uses available to affected private landowners.

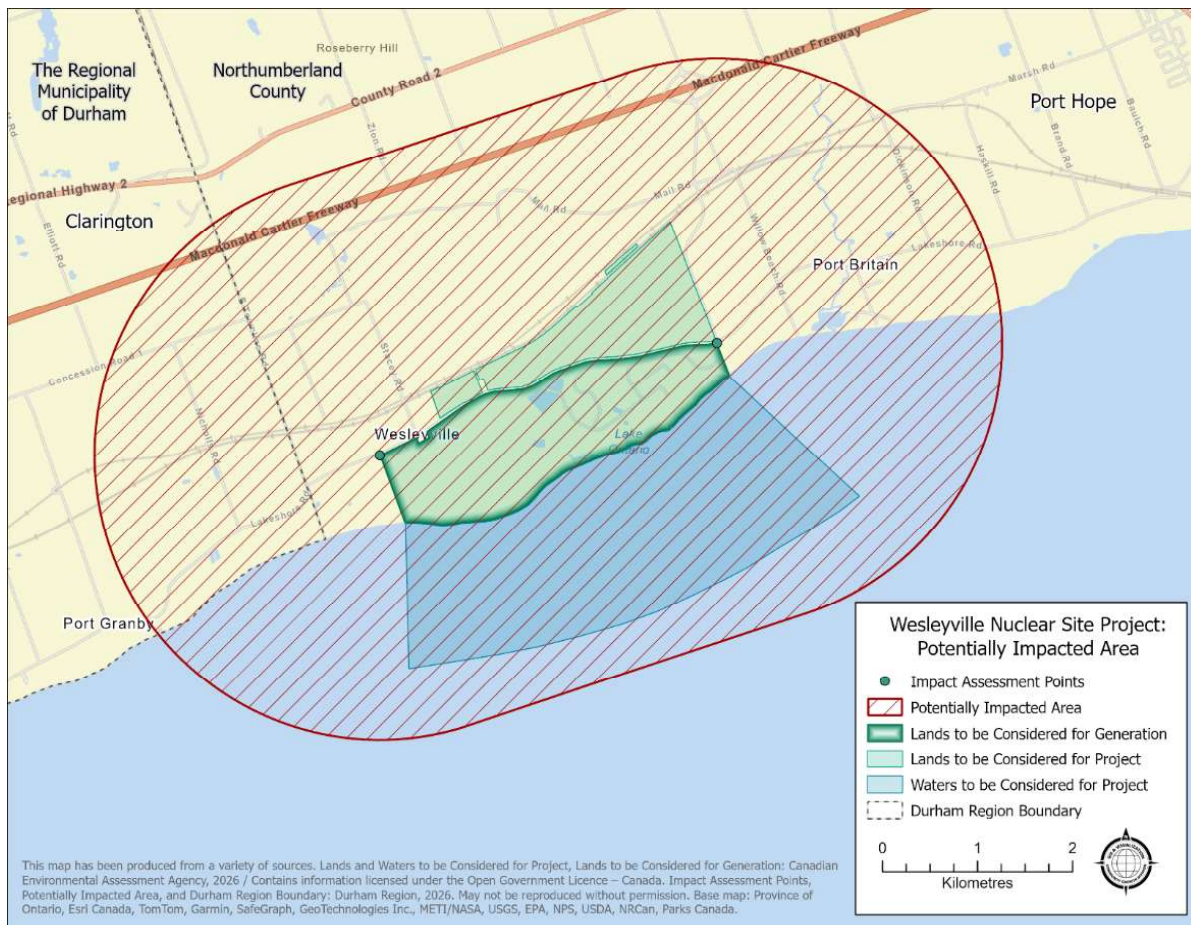


Figure 2: An estimate of the possible extent of area that would be impacted by land use restrictions as required by the CNSC. The actual area would be determined based on placement of the nuclear generating station within the lands being considered for generation.

### Private Wells

The site is not within a source protection area; however, private wells exist nearby. OPG should confirm whether they have assessed the nearby private wells including those within Durham Region and determined that they are sufficiently distant from the site to avoid any potential impacts.

### Cross-Boundary Impacts

Construction related dust, noise, vibration, and air quality impacts will not stop at municipal boundaries. Adjacent rural communities and agricultural lands may experience nuisance and health related effects. Transportation impacts, including workforce commuting, equipment movement, and emergency routing, will rely on Durham Region and Clarington’s transportation network. The Waterfront Trail, which

runs along Lakeshore Road, is another example of cross boundary active transportation network infrastructure that could be affected. The local and regional study areas must include adjacent lands within Durham Region and Clarington. Baseline data, modelling, and mitigation commitments should explicitly address cross-boundary effects, with monitoring programs designed to detect and respond to impacts experienced in Durham Region and Clarington. Assessments should evaluate transportation impacts on roads and corridors in Durham Region, including traffic volumes, safety, wear-and-tear, and emergency access. related dust, noise, vibration, and air quality impacts will not stop at municipal boundaries. Adjacent rural communities and agricultural lands may experience nuisance and health related effects. Transportation impacts, including workforce commuting, equipment movement, and emergency routing, will rely on Durham boundary

Durham requests to be consulted on the scoping of the transportation assessment and that OPG establish a Traffic Management Working Group with membership from all affected jurisdictions (i.e., Municipality of Port Hope, Northumberland County, Regional Municipality of Durham, Municipality of Clarington, and MTO) to ensure the Region has early clarity on mitigation measures and funding responsibilities for any required infrastructure upgrades.

Workforce migration and associated demand for housing and human services will affect Durham communities. This requires a regional socio-economic analysis of that extends beyond Port Hope and Northumberland County. The IA should include housing demand analysis, human services pressures, and adaptive monitoring commitments that encompass Durham Region communities likely to experience indirect growth impacts.

### **Cumulative Effects**

Durham already hosts one of the largest concentrations of nuclear infrastructure in Canada, including Pickering Nuclear Generating Station, Darlington Nuclear Generating Station, the Darlington Small Modular Reactor Project, and the Port Granby Waste Management Facility. The Wesleyville project would add another large-scale facility to this corridor. A cumulative effects assessment that reflects the regional nuclear context is necessary, particularly for emergency management, environmental monitoring, and service capacity.

### **Geology**

The Region notes that the Initial Project Description concludes that no structural weaknesses such as faults, shear zones, or solution cavities have been identified in the site bedrock. The Region also notes that legacy underground infrastructure associated with the former oil-fired generating station, including underground storage caverns, are not depicted in the geological cross-sections or discussed in detail in the baseline description.

To support transparency and a shared understanding of baseline conditions, the Region encourages future phases of the assessment to clarify how such legacy underground features were considered in the geotechnical characterization of the site, and whether they have any relevance to proposed excavation, grading, dewatering, or foundation design.

### **Shoreline Alteration**

Altering the Lake Ontario shoreline presents numerous environmental impacts. Shoreline hardening and lake infilling at Wesleyville may alter littoral sediment transport and wave energy regimes along the north shore of Lake Ontario, with potential down-drift effects on erosion and sediment deposition processes. Changes to sediment dynamics could plausibly affect shoreline stability at the Port Granby site, including bluff areas where 800 cubic metres of marginally contaminated soils were left in place as part of the Port Granby Project remediation.

The long-term safety case for Port Granby assumes stable shoreline and erosion conditions. Any project-induced change to those conditions represents a potential interaction between the Wesleyville project and the federally regulated historic waste management facility in Clarington.

### **Offsite Storage of Nuclear Waste**

OPG's Initial Project Description identifies several options for managing low- and intermediate-level nuclear waste from the Wesleyville project, including offsite storage at existing licensed facilities potentially in Durham Region. Because these scenarios could result in waste being transported to, processed within, or temporarily stored in Durham, it is critical that OPG engage with Durham Region and Clarington early and continuously. Canada's Radioactive Waste Policy requires open, transparent planning with early input from current and prospective host communities, yet Durham has not been engaged on any proposal involving the transport and storage of waste from an offsite facility to Durham's nuclear waste management storage sites. This gap is inconsistent with both federal policy and Durham's longstanding expectation that host communities must be full partners in decisions that affect their responsibilities and cumulative impacts.

Durham Region has a well-documented history as a nuclear host community and has consistently advocated for meaningful engagement, recognition of host responsibilities, and protection of community well-being across the full waste lifecycle. Past submissions to federal policy reviews and the Nuclear Waste Management Organization stress that additional waste burdens cannot be assumed without clear agreements, impact assessment, and appropriate mitigation. Given OPG is evaluating scenarios such as offsite processing and potential storage in Durham Region, the Impact Assessment must explicitly require early, formalized engagement with the Region and a comprehensive evaluation of host-community

implications. This is necessary to ensure alignment with Canada’s policy and to uphold Durham’s established Council positions on nuclear waste governance.

## **Cooling towers**

Although technology selection will occur at later project stages, the potential inclusion of cooling towers represents a significant issue for Durham Region that must be acknowledged early in the Impact Assessment. Cooling towers would introduce a highly visible industrial feature into the Lake Ontario shoreline landscape, with structures that can be seen from long distances across Durham’s waterfront communities, major transportation corridors (including Highway 401), and key public recreation areas. Their height, steam plumes, and industrial profile would materially alter public perception of the lakeshore and could contribute to the longstanding stigma associated with landmark nuclear infrastructure.

Durham Region has, for more than a decade, maintained a clear and repeatedly affirmed position opposing cooling towers for precisely these reasons. The concern is not solely aesthetic: the visibility and symbolic association of cooling towers can influence community identity, economic development potential, tourism activity, and investor confidence—particularly in areas undergoing waterfront renewal or mixed-use intensification. Introducing a highly prominent nuclear-associated feature at this location risks reinforcing negative public perceptions and contradicting established land-use planning directions, host-community expectations, and regional economic strategies.

Given the potential for cooling towers to create transboundary visual, social, and economic effects far beyond the project site, their inclusion would constitute a meaningful impact pathway under the Impact Assessment Act. Given the cumulative context of multiple nuclear facilities already present in Durham Region, the consideration of cooling towers is a matter of significant regional concern that must be explicitly addressed within the Impact Assessment process.

## **Engagement with Durham Region**

Within the Initial Project Description, it was noted that Durham Region continues to support the work of the Durham Nuclear Health Committee (DNHC), which is comprised of residents of Durham Region and serves as a community forum primarily focused on the discussion of radiological emissions from nuclear facilities and potential environmental and human health considerations. Engagement with the DNHC should not be interpreted as engagement with Regional Council or Regional staff, nor as a substitute for formal consultation with the Region.

## **Conclusion**

While Durham Region recognizes that the proposed project will create significant economic opportunities, including substantial local job creation and broader regional economic benefits, there will also be real and immediate pressures the project will

place on our municipal systems. In a period where municipalities are already financially constrained, this imbalance represents a meaningful impact pathway.

The Impact Assessment Act defines health as “a state of complete physical, mental, and social well-being, and not merely the absence of disease or infirmity.” Applying this lens requires a comprehensive understanding of how large infrastructure projects influence community well-being through both direct and indirect pathways. For Durham Region, the cumulative impacts associated with the proposed project create measurable pressures on the systems that support community health, including water and wastewater services, waste management, transportation networks, emergency response, long-term care, childcare, transit, and social services.

Durham Region’s Health Neighbourhoods mapping demonstrates how social, economic, environmental, and infrastructure determinants interact to shape health outcomes. The additional service demands identified throughout this submission show how these determinants may be strained as a result of project-related growth, emergency management obligations, environmental monitoring requirements, housing pressures, and increased transportation volumes. Financial impacts further reduce the Region’s ability to sustain or expand services essential to community well-being.

In this context, even a project with strong economic benefits can produce negative municipal-level impacts that are significant under the Impact Assessment Act. These impacts are not theoretical: they will emerge during construction and compound existing pressures as service demands increase without a corresponding revenue stream. A project of this scale will generate sustained demands on municipal service delivery at a time when local governments are already facing substantial infrastructure and fiscal pressures. For this reason, a broader, regionally scoped cumulative effects assessment is necessary to fully and transparently evaluate how the project will affect the overall well-being of Durham Region and Clarington residents.