



Generating Community-Based Sustainable Energy
<http://www.positivepowerco-op.com/>

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SUBMITTED BY EMAIL: Barbara.konyi@mah.gov.on.ca

RE: EBR Registry Number AF03E0002

Dear Ms. Konyi:

We appreciate the opportunity to comment on Bill 27 – the Greenbelt Protection Act, 2003. This submission identifies our areas of concern with the proposed legislation, and it is our hope that the Ministry of Municipal Affairs will consider this submission as the legislative process moves forward.

Positive Power is a non-profit co-operative dedicated to promoting and generating clean, sustainable energy through community-based renewable energy projects and education. The generation of renewable energy through technologies like solar power, run-of-the-river hydroelectricity and wind turbines are a key component to improvement of the environment. Our current major activities are centered on construction of a utility grade wind turbine within the Halton, Hamilton and Haldimand area, and two-thirds of our catchment area falls into the geographic area covered by Bill 27.

As an environmental non-governmental organization, Positive Power applauds the provincial government's move towards the protection of environmentally significant and sensitive areas within the Golden Horseshoe region. The protection of rural areas from urban encroachment is an important part of a sustainable environment, and Bill 27 is an important first step towards comprehensive maintenance of rural lands against urban sprawl and encroachment.

As a community co-operative currently working on wind energy projects, Positive Power is concerned about the potential for overly broad interpretations of the 'urban uses' definition in Bill 27 to include wind turbine developments in rural areas. With wind turbine projects considered a relatively new use in most Ontario municipalities, there is often little explicit support within zoning by-laws and Official Plans for the siting of wind turbines in rural areas. As such, zoning or Official Plan amendments may be required to permit the siting of turbines in areas defined as rural, which may potentially conflict with Bill 27's urban use definition.

Wind turbines are often ideally suited to siting in rural areas due in part to the open spaces present that lead to good wind generation. Due to their relatively small land requirements for the base structure, wind turbines are compatible with a wide variety of land uses, including agriculture and other rural commercial uses. Siting wind turbines in rural areas will not lead to urban encroachment into rural, agricultural or naturally significant areas, since the siting of a turbine will still permit the historic uses of the land to continue around the base of the structure.

The environmental benefits offered by an increase in the generation of renewable energy far outweigh any negligible impacts that wind turbines may have on rural and agricultural land use. This makes it important for the province to remove possible barriers to development, such as those that may be present with such a wide range of interpretations available to municipalities under the broad definitions of 'urban use' with Bill 27.



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It is important for municipalities to receive proper guidance in the interpretation of Bill 27 so that they can effectively support renewable energy projects like wind turbines. **Positive Power would like the Ministry of Municipal Affairs to provide clarification of the 'urban use' definition in Bill 27 with respect to wind turbine development being compatible with existing rural uses. It is clear that wind power generation should not to be considered an urban use in the context of the legislation.**

Thank you again for the opportunity to provide this submission to you. Positive Power remains committed to engaging constructively with the Ministry of Municipal Affairs in further dialogue through the consultation process developed by the Ministry.

Yours truly,

Jennifer Heneberry
Project Coordinator
Positive Power Co-operative Inc.

Curt Hammond
Chair, Board of Directors
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JH/jh

CC: Ted McMeekin, MPP Ancaster-Dundas-Flamborough-Aldershot
Al Fletcher, Senior Project Manager, City of Hamilton Development Department
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