



Generating Community-Based Sustainable Energy  
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December 17<sup>th</sup>, 2004

Victor Doyle, Manager  
Prov. Planning & Environmental Services Branch  
777 Bay Street, 14th Floor  
Toronto, Ontario, M5G 2E5  
SUBMITTED BY FAX: (416) 585-4006

**Re: EBR Registry NO PF04E0006 – Draft Proposed Greenbelt Plan**

Dear Mr. Doyle:

I am writing to you regarding the draft proposed Greenbelt Plan (EBR Registry No. PF04E0006), released on October 28, 2004. The Positive Power Co-operative has been following the development of the Greenbelt Protection Act for the last year and we have previously provided comments on Bill 27 and participated in stakeholder consultations with the Greenbelt Task Force. We appreciate the opportunity to again comment on the province's ongoing Greenbelt initiatives.

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 is 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 the draft Greenbelt Plan.

As an environmental non-governmental organization, Positive Power welcomes the introduction of the plan and 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 creating a sustainable environment, and the Greenbelt Plan is an important part of this movement.

As a community co-operative currently developing community based wind energy projects, Positive Power is concerned about the lack of explicit directions around the infrastructure definitions regarding electricity generation and transmission under section 4.1.2 of the draft plan. It is a logical interpretation of the plan that wind energy developments should be considered "hydro transmission facilities" and therefore subject to the requirements detailed in section 4.1.2.

Without more explicit inclusion of 'renewable energy generation facilities' in the definitions and objectives for infrastructure, the opportunity for municipalities to interpret the development of community wind projects under the more generic section 4.1.1 Non-Agricultural Uses section are increased. Attempting to develop wind energy projects under the Non-Agricultural Use requirements is substantially and needlessly more difficult – the restrictions on non-agricultural uses act as a barrier to effective wind energy development.

Community based wind energy projects offer a number of benefits to communities and on the municipal scale. These smaller scale wind energy projects, generally less than 10 MWs and ideally suited to rural areas, depend on community economic investment and offer economic paybacks to the rural community at large. It is important that such development not be discouraged. That 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 and lack of specific direction or inclusion of facilities indicated in sections 4.1.1 and 4.1.2 of the Greenbelt Plan.



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It is important for municipalities to receive proper guidance in the interpretation of the Greenbelt Plan so that they can effectively support renewable energy projects such as community based wind energy projects. It is necessary for the Ministry of Municipal Affairs to consider that the benefits of community based wind energy power offer a number of benefits to communities outside of simply meeting provincial goals of additional electricity generation capacity. **Positive Power would like the Ministry of Municipal Affairs to provide clarification of section 4.1.2 Infrastructure with respect to wind turbine development being considered a hydro transmission facility and indicate that municipal approvals of such developments proposed for Protected Areas be interpreted under this section of the Greenbelt Plan. It is clear that wind power generation should not be considered a non-agricultural use in the context of the legislation, and instead be considered as infrastructure.**

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 processes developed by the Ministry.

Yours truly,

Jennifer Heneberry  
General Manager  
Positive Power Co-operative Inc.

JH/jh

CC: Ted McMeekin, MPP Ancaster-Dundas-Flamborough-Aldershot  
Al Fletcher, Senior Project Manager, City of Hamilton Development Department  
Brent Kopperson, Board Chair, Ontario Sustainable Energy Association