



February 23, 2022

Environmental Registry of Ontario

Re: Notice: 019-4968

City of Ottawa Official Plan

The Ministry of Municipal Affairs and Housing

We are writing to express concern with portions of the new Official Plan drafted by the City of Ottawa, and currently under consideration by your ministry.

Our concerns are specific to sections on renewable energy development as discussed in the Official Plan.

An earlier draft of the Official Plan emphasized renewable energy and stated that the City would be permitting large-scale wind turbines as follows:

4.11

Renewable Energy Generation

3) Renewable energy generation facilities including large-scale wind, solar, and hydroelectric projects as well as smaller scale bioenergy, hydroelectric, wind, ground-mounted or rooftop solar projects provided such proposals fulfill all applicable Provincial requirements and siting criteria will be permitted as a principal use within the following designations:

- a) Rural countryside;*
- b) Greenbelt Rural and Greenbelt Facility; and*
- c) Natural Environment sub-designation*

The draft OP also stated that large-scale wind would be permitted as “on-farm diversified use”.

At the same time, Ottawa had published a document called the Energy Evolution in which it proposed to move the City toward Net Zero emissions by 2050. Part of the strategy was to develop 20 megawatts of industrial-scale wind power immediately (by 2025) and ultimately, to contract for 3200 megawatts of

new power generation, much of which would be wind power. The model suggested by the Energy Evolution document was 710+ wind turbines.

There was significant public reaction to this proposal, especially among the residents of Ottawa's rural areas. Various local and provincial media covered the story, and residents including our community group members, carried out a roadside sign campaign, with the theme "Stop the Ottawa Wind Turbines."

On the advice of our lawyer who is a municipal law specialist, we pointed out at the time that the new OP failed to match directives in the Provincial Policy Statement with regard to the need to protect prime agricultural land.

Many citizens contributed comments to the Official Plan engagement process; councillors participating in the joint Planning/Agricultural and Rural Affairs Committee meeting confirmed that they had had many calls and emails objecting to wind turbines.

The final version of the Official Plan, which includes a change made during the last public meeting on it, now reads:

4.11

Renewable Energy Generation

3) Renewable energy generation facilities that are subject to Provincial approvals will be permitted as a principal use within the following designations:

a) Rural Countryside;

b) Greenbelt Rural and Greenbelt Facility; and

c) Natural Environment Area sub-designation, subject to the policies of Subsection 7.3.

*4) Renewable energy generation facilities that are subject to provincial approvals are permitted as **subordinate uses** in the Agricultural Resource Area and Rural Industrial and Logistics designations.*

5) The following considerations will be used to establish zoning by-law provisions for such principal use renewable energy generation facilities:

a) Limiting nuisance impacts, such as through siting and screening requirements;

b) Limiting impacts on significant natural heritage features and agricultural resource area lands; and

c) The ability to access the electricity transmission network and arterial roadways.

6) Large-scale provincially regulated wind turbines are not permitted on lands designated Agricultural Resource Area. This policy does not apply to small-scale wind generation associated with a permitted principal use

The changes made reflect citizen concerns about the introduction of an industrial land use to rural areas, the need to protect prime agricultural land, and the need for protective regulation for noise, safety, and other negative impacts from the development and operation of industrial-scale wind power facilities.

However, there seems to be a contradiction between points 4 and 6 above: point 4 allows renewable generation facilities as “subordinate” uses on agricultural land, while point 6 says large-scale wind turbines will not be permitted. Clarification is needed here.

The main concern

The problem for our community group is that **we have no assurance that the City will not simply allow amendments to the Official Plan with regard to industrial-scale wind power.**

The Official Plan appears to state that it is subordinate to the Energy Evolution strategy and the Climate Change Master Plan.

On page 23 of the new Official Plan is this statement of intent:

While the Official Plan sets out goals and policies that embed climate considerations as part of the land use framework, the City’s broader goals and objectives with respect to climate mitigation and adaptation are contained in the Climate Change Master Plan. The policies of this Plan should be read as supportive of the Climate Change Master Plan.

And on page 26,

The Climate Change Master Plan and associated Energy Evolution and Climate Resiliency strategies provide the analysis and action plans for City-wide action.

Last, on page 45, is the expressed intent to “facilitate on-site generation” and further, engage in local distributed energy:

7) To reduce greenhouse gas emissions through land-use, transportation and energy planning consistent with Council-approved greenhouse gas reduction targets, projected demand for urban expansion will be reported on as part of the Climate Change Master Plan’s annual status updates considering the following objectives:

a) Alignment with local energy utilities to help control the cost of distribution, facilitate on-site generation and support local distributed energy;

Our chief concern then is the possibility that Ottawa’s Official Plan is actually subordinate to the Energy Evolution strategy document and climate change plan. We are concerned that statements and directions

in the Energy Evolution document could override key elements of the Official Plan, such as the need to protect agricultural land (a tenet of the Provincial Policy Statement) in order to achieve the goals of the City's climate change ideology.

As we write this today, there is a story in the *Ottawa Citizen* reporting the concerns of the City's Auditor General about the plan to purchase electric buses without seeing data from the city's own pilot project to examine the feasibility of such buses. That pilot project is not completed, yet the City plans to buy dozens of buses. The Transit committee chair admitted that "the procurement 'is a bit of a gamble' without a longer pilot period." His rationale was that "the federal incentives were too good to pass up."

In our view, this is evidence of a city structure that is willing to act precipitously and without full cost-benefit analysis, simply to meet its ideological goals.

Zoning amendments too have been passed without public awareness, as in the example of a large warehouse and truck depot for which a zoning amendment was passed without the knowledge even of the local councillor. The event caused a local newspaper columnist to remark, "You know who doesn't get what they want at city hall anymore? Ordinary people."¹

The contents of the Energy Evolution document are not widely known among Ottawa's citizens, but there has been criticism from media and analysts who have read it.

Local media branded the strategy document "an expensive pipe dream," with its \$57B (estimated) price tag. A political commentator said the Energy Evolution report was "only the beginning," and promoted "unachievable goals." "How high are they prepared to raise taxes," he asked, "and what existing services will they cut to fund their quixotic effort to save the planet?"²

In a recently released report on the Ottawa climate action plans, authors with engineering and economics expertise claimed the Energy Evolution strategy was "hopelessly naïve and ultimately impossible to enable."³ They predicted that electricity costs for Ottawa residents would double in ten years if the plan were enacted, businesses would flee the city, and the use of 100-percent renewables would destabilize the electricity system, leading to blackouts and failure.

The result, they said, would be this:

"This scenario, more than any other, should frighten City of Ottawa councillors intent on following Texas' lead into a green energy nightmare. **A secure and prosperous city is impossible with a weak electrical grid, and Ottawa's grid would be the weakest imaginable if the City of Ottawa's Climate Change Master Plan is ever fully enabled.**"⁴

¹ Egan, Kelly. Only at City Hall does No –4000 times—equal yes. *Ottawa Citizen*, June 12, 2021, page A12.

² Denley, Randall. City's proposed climate change mega-plan little more than an expensive pipe dream. *Ottawa Citizen*, October 14, 2020.

³ ICSC Canada. Report on the City of Ottawa's Climate Change Master Plan, page 1. Available at: [Ottawa's Climate Change Plan | ICSC - Canada](#)

⁴ ICSC Canada, page 26.

The main concern with the Energy Evolution plan is the reliance on an intermittent, variable, weather-dependent power source that requires subsidies, thus escalating electricity bills, as well as the significant negative impact of industrialization of Ottawa's rural communities with wind turbines. The Ontario experience with wind power is well known, with Auditor General Bonnie Lysyk detailing over-payment for the variable power source by billions, and the acknowledgement of the Ontario government that thousands of formal reports of noise pollution (Incident Reports) are now held by the Ministry of Environment, Conservation and Parks.

The City of Ottawa planning staff acknowledge these drawbacks. In a letter to Ottawa Wind Concerns, Ottawa Manager of Planning Policy Alain Miguelez wrote:

"The Ministry keeps track of incident reports that are related to projects approved under an REA [Renewable Energy Approval]. The majority of complaints are with respect to wind facilities. Since 2006, the ministry has received approximately 7,100 complaints on the development, operation and closure of wind facilities in the province. The main complaints are related to:

- Infrasound and low-frequency noise
- Ice throw
- Project changes or modifications
- Vibration
- Structural failures
- Safety lights
- Wildlife [as in, deaths of]"⁵⁶

The Minister of Energy has stated numerous times that the government's focus going forward is on "reliable and affordable" energy. Intermittent, weather-dependent wind power is neither.

The cost-benefit of wind power is one concern, but safety is another. In December, the Multi-Municipal Wind Turbine Working Group issued a report expressing concern about the increasing number of wind turbine failures ("catastrophic failures," as engineers call them) in Ontario. There have been multiple incidences of such failures in which pieces of wind turbines are shed for significant distances and pose a risk to safety.

At present, there is no mechanism through which municipalities are notified of such failures, nor is there a process for investigation and publication of results of any inquiries into the causes of and recommendations for prevention of such catastrophic events.

⁵ Miguelez, Alain. City of Ottawa. Email to Jane Wilson, Ottawa Wind Concerns, September 14, 2021.

⁶ Note that infrasound and low-frequency sound are associated with serious adverse health effects. The government's Incident Reports are not just single complaints of a noise event but may be master files containing many dozens, even hundreds of individual reports.

#	Date	Project	Type	Equipment	Age at Failure
1	April 2007	Port Burwell	Blade Failure	GE 1.5	11 months
2	January 2008	Prince Wind	Blade Failure	GE 1.5	2.1 years
3	April 2013	Kingsbridge 1	Fire	Vestas V80	7 years
4	August 2015	Goshen	Blade Failure	GE 1.62	6 months
5	April 2017	Bornish	Blade Failure	GE 1.62	3 years
6	January 2018	Raleigh	Tower Collapse	GE 1.62	7 years
7	May 2018	Huron Wind	Blade Failure	Vestas V80	15.4 years
8	April 2019	Sumac Ridge	Blade Failure	Senvion MM92	1.3 years
9	June 2021	Skyway 8	Blade Failure	Vestas V100	6.9 years
10	August 2021	Bow Lake	Tower Collapse	GE 1.62	6 years

Again, this history of catastrophic equipment failure further underscores the fact that industrial-scale or grid-scale wind turbines are an industrial land use, and **do not belong in communities** next to homes, schools and villages.

Conclusion

It is our opinion that the City of Ottawa’s expressed view that the Energy Evolution document overrides all policy and actions means the statements made in the Official Plan could be subject to amendment at any time.

We believe this approach is not in keeping with the intent of an Official Plan: the single document which outlines the direction for the city. In the case of the City of Ottawa, this direction is also determined by the Climate Change Strategy and the Energy Evolution document.

On this basis, we ask that your review of the Official Plan also consider the Energy Evolution and the Climate Change Strategy as integral parts of the Official Plan.

We note again that the City has a long history of Official Plan and zoning amendments; with its primary focus on its climate change strategy and reliance on the Energy Evolution document to direct action, it is more than possible that the statements made in the Official Plan will be overridden by Council directive.

In the process of developing the Official Plan, we saw elements such as the potential for industrial-scale wind turbines on agricultural land evolve in response to public feedback, but the commitment to promoting these industrial power projects remains unchanged in the Energy Evolution document.

We ask that you review the Energy Evolution and climate change strategy documents as part of Ottawa's Official Plan and ensure that **entire package is consistent** with the Provincial Policy statements and any inconsistencies between the plans be resolved before the Official Plan is approved.

Thank you.

A handwritten signature in black ink that reads "Jane Wilson" followed by a stylized flourish.

Jane Wilson

Chair

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Ottawa Wind Concerns is a community group established in 2009 in response to proposals for several industrial-scale wind power projects in the Ottawa area. OWC is a corporate member of the Wind Concerns Ontario community group coalition.