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Town of Tecumseh
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Via Email

RE: Draft Tecumseh Hamlet Secondary Plan – Comments Related to Electrical Transmission Systems and Rights-of-Way

Canacre Ltd. on behalf of Infrastructure Ontario (IO) and Hydro One Networks Inc. (HONI), has reviewed the Draft Tecumseh Hamlet Secondary Plan dated August 2024. Infrastructure Ontario is the strategic manager of the provincial government's real property, which includes hydro corridor lands, and has a mandate of maintaining and optimizing value of the portfolio. Hydro One Networks Inc. jointly manages the hydro corridors owned by the Province with IO and is involved in the planning, construction, operation, and maintenance of their transmission and distribution network.

This review of the Draft Tecumseh Hamlet Secondary Plan takes direction from the Provincial Policy Statement (PPS) (effective May 1, 2020) as it relates to electricity generation facilities and transmission and distribution systems. In particular, PPS Section 1.6 provides specific direction for municipalities to maintain the primacy of hydro corridor lands for the transmission and distribution of electricity throughout the province. The relevant PPS Sections include:

***1.6.1** Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs.*

Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they are:

- a)** financially viable over their life cycle, which may be demonstrated through asset management planning; and*
- b)** available to meet current and projected needs.*

***1.6.8.1** Planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit and electricity generation facilities and transmission systems to meet current and projected needs.*

***1.6.8.3** Planning authorities shall not permit development in planned corridors that could*

preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified.

New development proposed on adjacent lands to existing or planned corridors and transportation facilities should be compatible with, and supportive of, the long-term purposes of the corridor and should be designed to avoid, mitigate or minimize negative impacts on and from the corridor and transportation facilities.

1.6.11.1 *Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, district energy, and renewable energy systems and alternative energy systems, to accommodate current and projected needs.*

Concerns

1. Terminology

Policy 5.7.1.iv states:

The width required for public easements under and across the Hydro Corridor and CP Rail lands is subject to confirmation by both **Hydro One** and CP Rail.

Policy 5.7.1.iv Recommendation

The width required for public easements under and across the Hydro Corridor and CP Rail lands is subject to confirmation by both **Hydro One Networks Inc.** and CP Rail.

Terminology Recommendation

We would like to encourage a consistent approach to defining hydro corridors and electricity infrastructure facilities throughout the province. Accordingly, it is requested that the following language be considered for use throughout the Draft Tecumseh Hamlet Secondary Plan, including in the definition of "Infrastructure."

- All references to Hydro One should be referred to as "Hydro One Networks Inc."
- All references to corridors used for the transmission and distribution of electricity should be referred to as "hydro corridors."
- All references to electricity infrastructure and facilities should be referred to as "electricity generation facilities and transmission and distribution systems."

2. Secondary Uses

Policy 5.5.2.v states:

The Hydro Right-of-Way utility corridor, shown on Schedule "B-1" of the Town's Official Plan,

should be considered as a location for recreational uses such as walking, cycling and other activities. The permitted uses within these areas shall include public and private recreational uses.

Policy 5.5.2.v Recommendation

Please update the language as below to allow for additional flexibility and not limit to recreational uses:

The Hydro Right-of-Way utility corridor, shown on Schedule "B-1" of the Town's Official Plan, should be considered as a location for recreational uses such as walking, cycling and other activities. The permitted uses within these areas shall include public and private recreational uses **and other compatible secondary uses as approved by Hydro One Networks Inc.**

Policy 6.3.24 states:

Create an uninterrupted, paved pathway within the hydro corridor, complete with clear directional markings, signage, and wayfinding elements. Incorporate pedestrian-scaled lighting to ensure safety and usability.

Policy 6.3.24 Recommendation

Please note that this policy is only achievable through technical review and approval from HONI. Please amend the policy as below:

With technical review and approval from **Hydro One Networks Inc., explore opportunities to** create an uninterrupted, paved pathway within the hydro corridor, complete with clear directional markings, signage, and wayfinding elements. Incorporate pedestrian-scaled lighting to ensure safety and usability.

Secondary Uses Recommendation

We request the addition of the following Policy 6.3.25 of the Secondary Plan:

"Secondary uses, such as active and passive recreation, agriculture, community gardens, other utilities and uses such as parking lots and outdoor storage that are accessory to adjacent land uses, are encouraged on hydro corridor lands, where compatible with surrounding land uses. However, a proponent should be aware of the primacy of a hydro corridor is for electricity generation facilities and transmission and distribution systems, and that secondary uses require technical approval from Hydro One Networks Inc."

The requested policy would provide flexibility for future uses on hydro corridor lands. The inclusion of this policy offers clarity with respect to the types of secondary uses that are possible on hydro corridor lands, in accordance with the Provincial Secondary Land Use Program. Having these policies in place will also streamline the number of municipal planning approvals that a proponent must seek when they

apply to HONI/IO for a secondary use.

We would request that this letter be included as part of the record of submissions for the Draft Tecumseh Hamlet Secondary Plan and that we be notified of any decisions regarding these matters.

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Thank you for your consideration. Please contact us if you have any questions or comments.

Kind Regards,

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Cc: Shadi Shenouda, HONI
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