

October 27, 2025

Our Matter No. 160435

By E-Mail to MinisterEnergy@ontario.ca

Hon. Stephen Lecce  
Minister of Energy and Mines  
77 Grenville Street, 10th Floor  
Toronto, ON M7A 2C1

Dear Minister Lecce:

**Re: ERO Number 025-1133  
Refining a Protected Corridor of Land for Future Electricity Transmission  
Infrastructure in the Northwest Greater Toronto Area**

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We are writing to express concern with a sudden change in the proposed Narrowed Area of Interest for the Northwest GTA Transmission Corridor, which was released on October 10, 2025. For the first time, in a process that has been underway for years, the proposed hydro corridor does not co-locate with the route of the proposed Highway 413. It is now proposed to run as a separate piece of linear infrastructure for a distance of approximately four kilometres in the City of Brampton from south of Bovaird Drive, through numerous properties, to Wanless Drive in the north.

The previous more than six years of study has not included this land as part of the identified Narrowed Area of Interest for the purposes of study and consultation. As such, the new proposed route is a dramatic surprise to affected landowners and is a significant departure from the number 1 “Guiding Principle” of the study process - that linear infrastructure should be co-located.

The proposed new route contradicts years of statements and presentations from the Ministry of Energy and the Independent Electricity System Operator that have indicated that the hydro corridor would be co-located with the Highway 413, and located adjacent to that Highway.

The proposed new route is not consistent with Provincial Policy, which requires the co-location of linear infrastructure. It is also not consistent with Provincial Policy which requires planning to avoid, or minimize and mitigate negative impacts from planned corridors on adjacent lands, by effectively doubling the amount of adjacent lands negatively affected by the presence of corridors in the affected area.

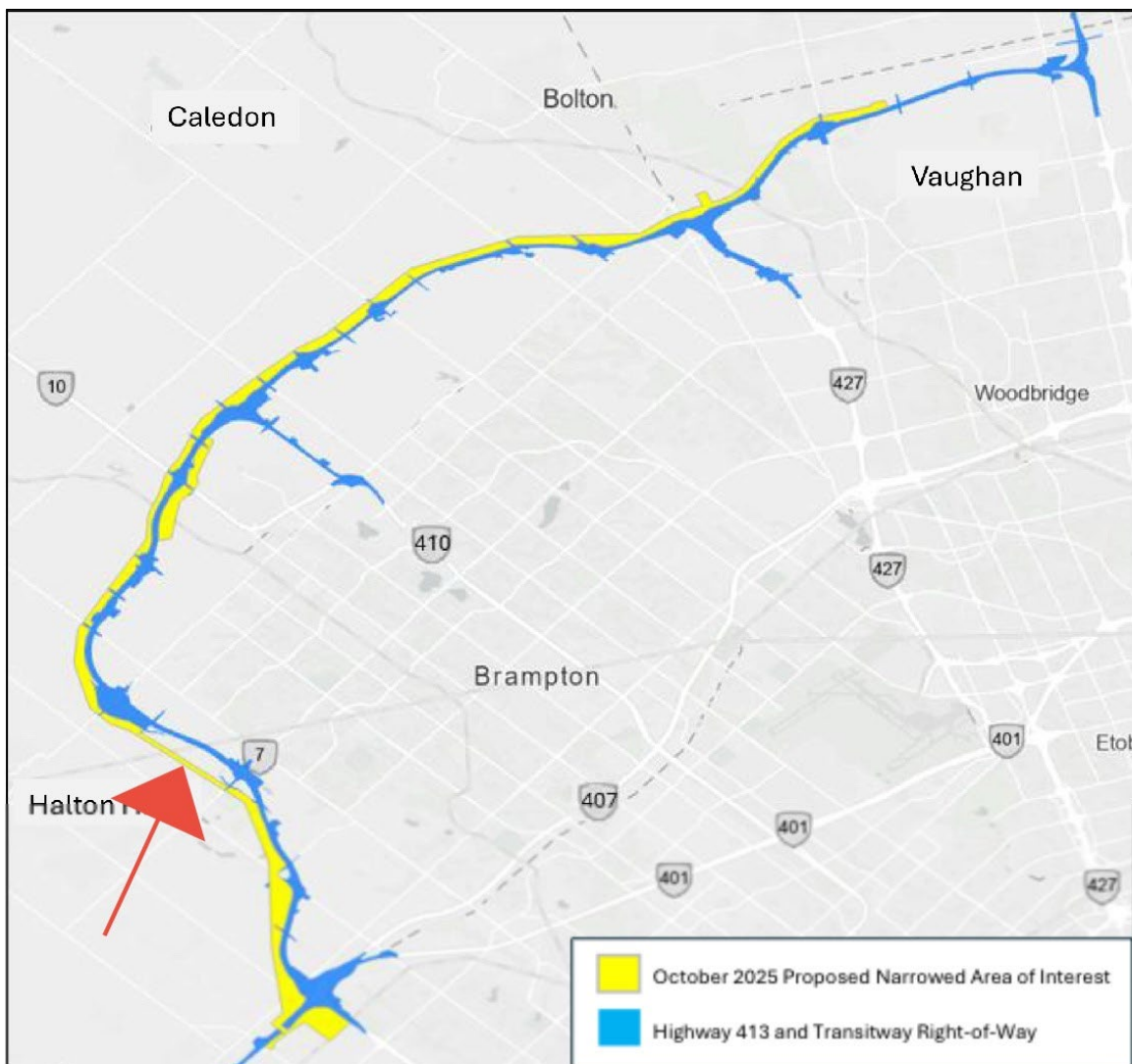
The dramatic and sudden change in the proposed route, without any notice, will have significant negative impacts on the years of community planning that has been undertaken - including approval of a Secondary Plan through a lengthy Ontario Land Tribunal Process, which culminated in August 2024. The Province declined to take an active role in that process, once it was assured that the planning would respect the Highway 413 Focused Analysis Area, which was coincident with the proposed hydro corridor study area.

The change in the proposed hydro corridor route is profoundly unfair to the landowners and municipality who have spent significant time and funds, planning in good faith, while ensuring that the proposed provincial uses including the hydro corridor would be accommodated.

The Province and the IESO should return to an approach where the hydro corridor is co-located with the Highway, as has always been the proposal previously.

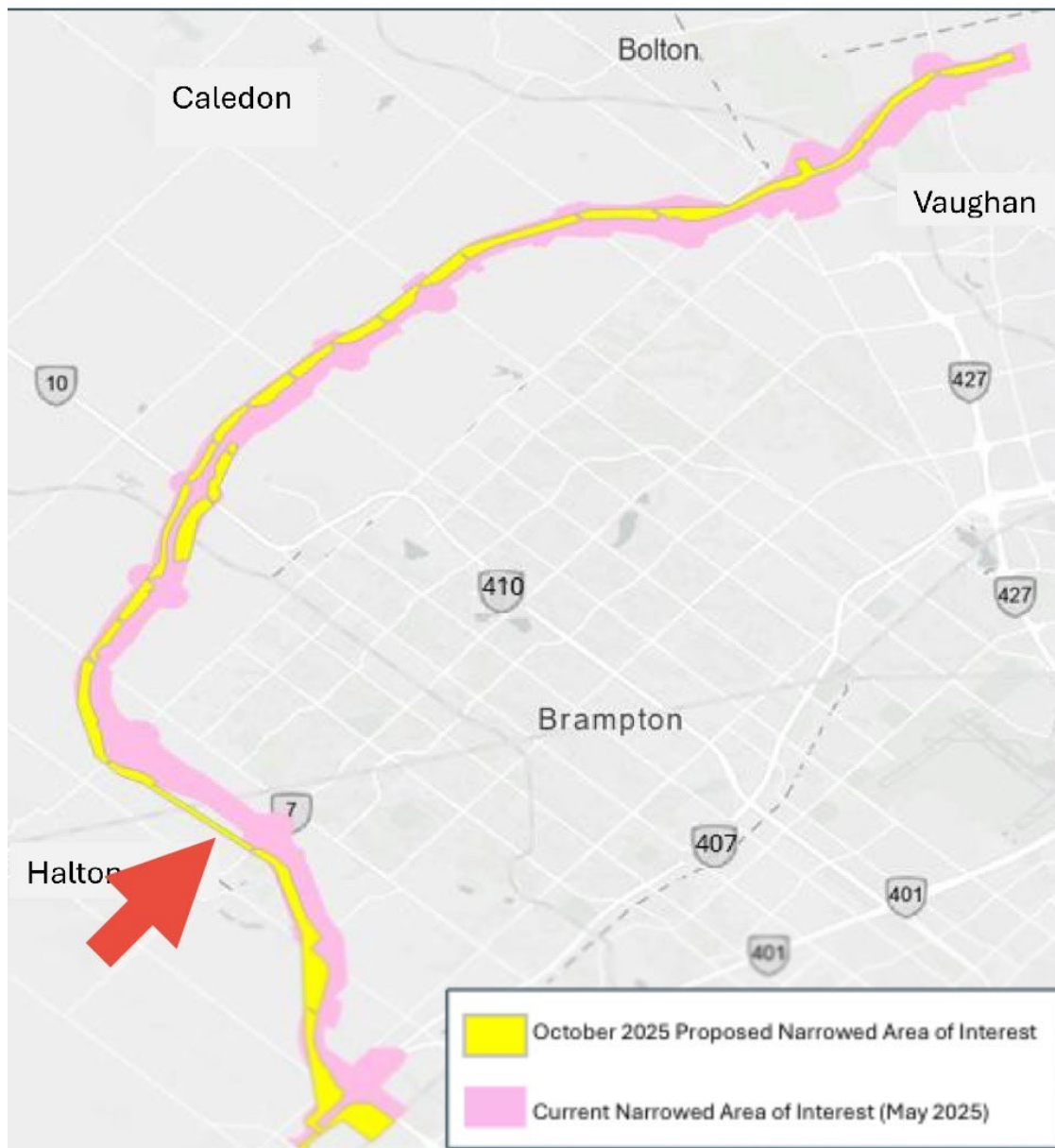
**The Proposed Narrowed Area of Interest for the Hydro Corridor Diverts Away from the Highway 413 ONLY in Heritage Heights in Brampton - No Explanation for This Has Been Provided in Any Published Materials**

After years of a process in which the hydro corridor was always proposed, and shown, to be co-located with the Highway 413 corridor, the October 10, 2025 announcement suggests a new route, on previously unstudied lands. The area in question is identified by the red arrow.



The above image demonstrates how the hydro corridor is no longer co-located with the Highway 413 in the Heritage Heights community in Brampton.

The image that follows shows how, in the affected area, the new Narrowed Area of Interest is entirely outside of the previously published Narrowed Area of Interest – demonstrating that the Heritage Heights portion of the new route is previously unstudied, and has not been the subject of any consultation.



## **The Separation of Hydro Corridor from the Highway 413 is Not Consistent With Provincial Policy Requirements**

The sudden move to separate the hydro corridor and the Highway 413 corridor into two separate elements of linear infrastructure is contrary to Provincial Policy requirements.

Provincial Planning Statement policy 3.3.5 indicates that *"The co-location of linear infrastructure should be promoted, where appropriate."* The divergence of the hydro corridor from the highway corridor in this part of Brampton is not consistent with this policy requirement.

The reason for this policy requirement is that linear infrastructure, like highways and hydro corridors, are immensely disruptive to the physical, cultural and social cohesion of communities. Provincial policy encourages the creation of complete communities. The effect of the proposed change in the hydro corridor route is to shred that portion of the Heritage Heights community in Brampton into alternating narrow strips of linear community interrupted by linear strips of high impact public infrastructure.

The Provincial Planning Statement, while issued pursuant to Section 3 of the Planning Act, has a much wider scope. Under the caption "Role of the Provincial Planning Statement", the document includes the following:

*"As a key part of Ontario's policy-led planning system, the Provincial Planning Statement sets the policy foundation for regulating the development and use of land province-wide, helping achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians."*

As such, it is important that the policy requirements articulated in the Provincial Planning Statement be followed in the planning of the Northwest GTA Transmission Corridor.

## **The Move From a Single Co-located Infrastructure Corridor to Two Separated Infrastructure Corridors in Brampton is Contrary to Provincial Policy to Avoid, Minimize or Mitigate the Negative Impact of Corridors on Adjacent Lands**

Provincial policy requires that planned corridors avoid, minimize or avoid negative impacts on adjacent lands. Instead, the proposed new Narrowed Area of Interest for the hydro corridor actually doubles the planned corridor negative impacts on adjacent lands in Heritage Heights in Brampton.

Policy 3.3.3 in the Provincial Planning Statement is as follows:

*3.3.3 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 proposals proposed on adjacent lands to existing or planned corridors and transportation facilities should be compatible with, and supportive of, the long-term purpose of the corridor and should be designed to avoid, or where avoidance is not possible, minimize and mitigate negative impacts on and adverse effects from the corridor and transportation facilities.*

When the Heritage Heights Secondary Plan was considered and approved by the Ontario Land Tribunal, it was found to be consistent with the above policy - based upon a common understanding at the time that the hydro corridor would be co-located with the Highway 413.

Although the policy assumes that adjacent land uses are decided AFTER the planned corridor is established, in this case, the land uses planning has happened first. However, it is clear that the same principle - avoid, minimize and mitigate negative impacts and adverse effects from the planned corridors - applies under the Provincial policy.

However, the move from a single co-located infrastructure corridor, to two separated linear infrastructure corridors immediately doubles the extent of the negative impacts and adverse effects on adjacent lands on a simple linear basis. Instead of one highway flankage negatively affecting adjacent lands, there will now be two. Instead of one hydro corridor flankage negatively affecting adjacent lands, there will now be two such abutting high impact conditions for the same distance.

What's more, if the highway itself is considered to cause more severe negative impacts than the hydro corridor (a reasonable perspective), then the move away from co-location is particularly harmful in causing adverse effects. Under the co-location model, the hydro corridor forms a buffer between the highway and adjacent lands. Without that co-location, the benefit of that buffering in mitigating highway impacts is lost.

The changed route will increase negative impacts and adverse effects on adjacent lands, as well as significantly increasing the amount of negatively affected adjacent lands.

### **The Move Away from Co-Location of the Hydro Corridor With The Highway 413 Corridor is Contrary to the Guiding Principles of the Corridor Location Study Process**

In an Environmental Registry proposal posted March 23, 2020 titled "Proposal to Identify and Protect a Corridor of Land for Future Electricity Infrastructure in the Greater Toronto Area", the Ministry of Energy, Northern Development and Mines sets out the "Guiding Principles for Corridor Identification.

The very first guiding principle is identified as follows:

1. **Co-locate with other Linear Infrastructure**
  - Corridor routing should maximize the use of existing linear infrastructure corridors wherever feasible ( e.g. GTA (Greater Toronto Area) West Transportation Corridor, 400 series highways, other infrastructure corridors).

This guiding principle has been followed throughout the study process continually until October 10, 2025. Only with the recent announcement has there been a departure from the primary principle of co-location, and only in the Heritage Heights community in Brampton.

The Government posting requires co-location “wherever feasible”. There has never previously been any suggestion that co-location in this area is not feasible. There continues to be no basis on which to conclude that co-location is not feasible.

The departure from the very first publicly declared guiding principle for corridor identification has not been in any way justified. Such a departure from a foundational guiding principle, which was the basis for public consultation, would represent a serious flaw in the process.

### **The City of Brampton is Opposed to the Proposed New Hydro Corridor**

For many of the planning reasons identified above, the City of Brampton is opposed to the proposed new location for hydro corridor Narrowed Area of Interest in Heritage Heights. A staff report reflecting reasons for that opposition has been recently endorsed by Council.

It is likely that, should the proposed new route be maintained, the west side of the Heritage Heights Secondary Plan will need to be re-examined and reassessed. This will cause extraordinary planning and legal costs to the municipality (as it will for the many landowners affected).

This disruption, and new consequent planning process, will delay the delivery of thousands of units of new housing supply for a matter of years. This is unacceptable at a time of a housing supply crisis.

It is also likely that the unusual land use patterns that will be caused by the strips of development alternating with linear infrastructure corridors, will result in increased engineering costs for the municipality, and less efficient ongoing operational costs for municipal assets like roads and parks in the area. This will be, in part, a consequence of the resulting inefficient land use pattern, and the likelihood of a long-term smaller tax base to support a similar amount of municipal services and infrastructure.

### **The Process is Now Severely Flawed. For Over Six Years, There Has Been No Suggestion, Study or Consultation Regarding Locating the Hydro Corridor West of Heritage Road**

The process is now deeply flawed. For more than six years, there has been no suggestion that the lands west of Heritage Road were a possible hydro corridor route location. On the contrary, the hydro corridor location has consistently been a substantial distance to the east, co-located with the proposed Highway 413.



For years, all communications and announcements from the Government and the Independent Electricity System Operation have emphasized that the intention is to co-locate the hydro corridor with the Highway 413 corridor. The following is a sample of such public comments from the Government and IESO:

**April 28, 2015 - IESO Northwest Greater Toronto Area Integrated Regional Resource Plan**

“It is recommended that work continue to establish a corridor for a future transmission near the planned West GTA transportation corridor. Coordinated planning for linear infrastructure corridors is consistent with the direction provided in the PPS.”

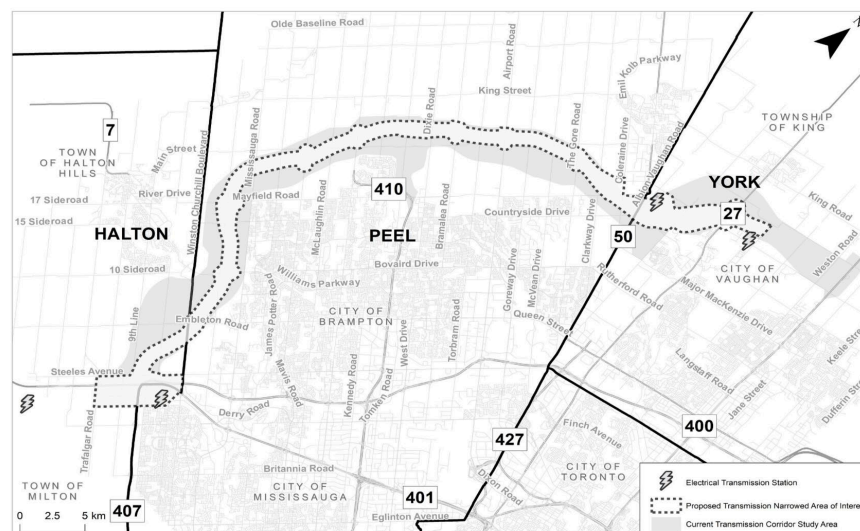
**February 15, 2018 - IESO News Release Northwest - Greater Toronto Area Joint Corridor Identification Study Announced**

“The IESO and the Ministry of Transportation have announced a joint corridor identification study on a proposed land corridor in the Northwest Greater Toronto Area (NW GTA) . The purpose of the study is to identify land to be protected for multi-purpose linear infrastructure (such as transmission lines and transportation infrastructure) to ensure it can be accommodated if and when the need arises.”

**June 2019 - Notice of Northwest GTA Transportation Corridor Identification Study Notice**

“At this time, ENDM and the IESO are proposing a narrowed area of interest. A map of the study area and the proposed narrow area of interest are shown below. The narrowed area largely corresponds to MTO’s narrowed 2019 FAA for the GTA West Highway Environmental Assessment with some differences.”

**Map: Current Transmission Corridor Study Area and Proposed Transmission Narrowed Area of Interest**



**March 23, 2020** - Environmental Registry Posting - Ministry of Energy, Northern Development and Mines - Proposal to Identify and Protect a Corridor of Land for Future Electricity Infrastructure in the Greater Toronto Area

“Provincial policy supports the co-location of linear infrastructure which has the potential to mitigate the impact on surrounding agricultural land and environmentally sensitive areas.”

“Planning underway by the Ministry of Transportation related to the Greater Toronto Area West Transportation Corridor offers an opportunity to consider co-location. That’s why the starting point for the study, announced in June 2019, was the Ministry of Transportation’s 2015 Focused Analysis Area (“2015 FAA”).”

“At this time, we are proposing a narrowed area of interest. The narrowed area largely corresponds to MTO’s (Ministry of Transportation’s) narrowed 2019 Focused Area Analysis (“2019 FAA”) for the GTA (Greater Toronto Area West Highway Environmental Assessment with some differences.”

“Guiding Principles for Corridor Identification”

- “1. Co-locate with other linear infrastructure
- Corridor routing should maximize the use of existing linear infrastructure corridors wherever feasible (e.g. GTA (Greater Toronto Area) West Transportation Corridor, 200 series highways, other infrastructure corridors).”

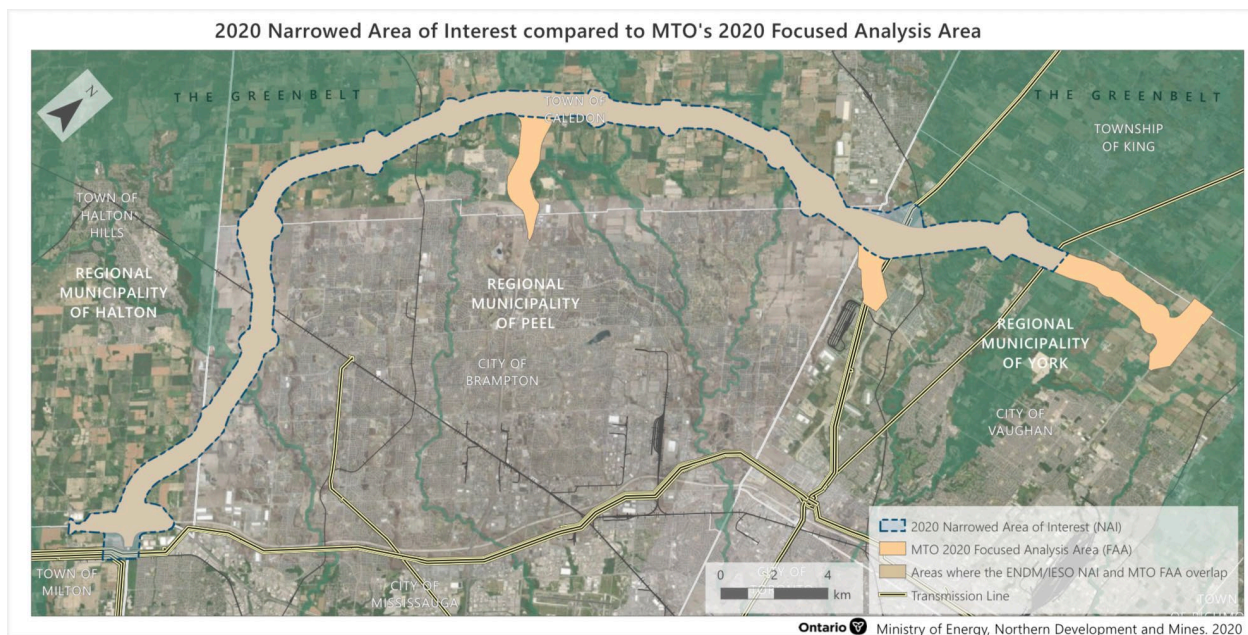


**November 18, 2020** - Environmental Registry of Ontario Posting Notice of Decision - Ministry of Energy, Northern Development and Mines - Proposal to Identify and Protect a Corridor of Land for Future Electricity Infrastructure in the Greater Toronto Area

“The study team heard consistently from stakeholders about the need to closely coordinate the transmission study with the transportation study in order to reduce impacts on property owners.”

“Many commenters expressed support for ... co-location of future transmission infrastructure with the proposed GTA (Greater Toronto Area) West Transportation Corridor in order to reduce overall impacts top natural heritage, farmland, and existing and planned communities and employment lands.”

“We have released a revised study area related to the Northwest GTA (Greater Toronto Area) Transmission Corridor Identification Study.”



**July 2021** – IESO Greater Toronto Area West (Peel/Halton) Integrated Regional Resource Plan

“Provincial policy encourages colocation of linear infrastructure to reduce land use impacts and the IESO and Ministry of Energy are conducting a joint study to ultimately identify a suitable corridor that can be preserved for future transmission infrastructure should the need arise. The expectation is that the preferred route for this future transmission corridor will largely align with MTO’s highway study area.”

**October 29, 2024 - IESO GTA West Regional Electricity Planning Engagement Webinar Deck**

“The IESO and the Ministry of Energy and Electrification are conducting a joint study to identify land to be protected for a future transmission corridor (adjacent to Highway 413) to support anticipated long-term growth in demand for electricity in the GTA West region.”

“Provincial policy encourages colocation of linear infrastructure to reduce land use impacts. The IESO and Ministry of Energy and Electrification are conducting a joint study alongside the highway EA to protect land for a potential future transportation corridor.”

**November 20, 2024 - IESO Quarterly Bulk Planning Update South & Central Bulk Study presentation deck**

“Continue to work with the Ministry of Energy and Electrification to identify and preserve land required for transmission infrastructure to support long-term growth in the GTA.”

“Northwest GTA Transmission Corridor: Study already underway to identify suitable land adjacent to the 413 highway for a future transmission corridor.”

**December 9, 2024 - Environmental Registry Posting - Ministry of Transportation - Highway 413 Focused Analysis Area and Northwest GTA Transmission Corridor Narrowed Area of Interest Refinements**

“The FAA (Focused Analysis Area) and the NAI (Narrowed Area of Interest) are almost identical. The land being protected by the Ministry of Energy and Electrification is the same land being protected by the Ministry of Transportation, except where each is protecting additional lands specific to its particular use.”

**May 2, 2025 - Environmental Registry Posting Decision Notice - Highway 413 Focused Analysis Area and Northwest GTA Transmission Corridor Narrowed Area of Interest Refinements**

“... seeking to identify and preserve a corridor of land suitable for future transmission infrastructure adjacent to the proposed Highway 413.”

“The Narrowed Area of Interest (NAI (Narrowed Area of Interest)) for the Study, originally identified in 2020, has been updated to include targeted refinements. These adjustments represent areas that MEM (Ministry of Energy and Mines) is able to release based on recent preliminary design work on Highway 413 that have allowed for a better understanding of infrastructure alignment and co-location.”

**Heritage Heights Secondary Planning Protected for the Co-Located Corridor Including At an Ontario Land Tribunal Hearing - Province Declined to Participate, Apparently Satisfied with Proposed Corridor Protection - It is Unfair for Province to Now Dramatically Alter Its Position At this Late Stage**

The Heritage Heights Secondary Planning process was a lengthy exercise spanning many years. The City of Brampton and landowners made considerable efforts to plan around and accommodate the single co-located hydro and highway corridor.

The Province of Ontario declined to participate in the mediation of the Tribunal appeals, and declined to participate in the hearing itself. The Province indicated that it was satisfied with the steps that the parties, including the City of Brampton, were taking to protect and plan for the co-located hydro and highway corridor.

The policies in question are now reflected in the Tribunal approved Secondary Plan:

*10.5 Focused Analysis Area and Narrowed Area of Interest*

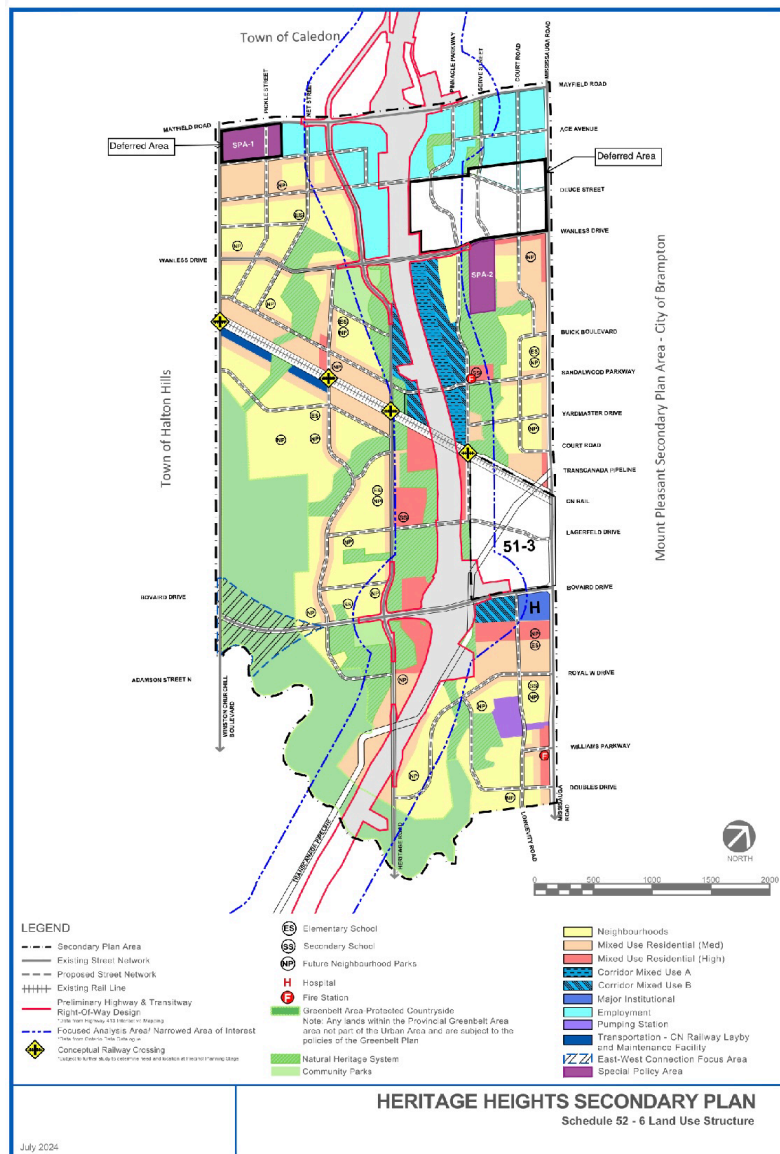
*10.5.1 Lands within the Focused Analysis Area and Narrowed Area of Interest as shown on Schedule 52-6 will continue to be protected by the City of Brampton's Interim Control By-law 306-2003, until the Province of Ontario has released those areas.*

*10.5.2 This plan is predicated on the development of the proposed Transportation Corridor accommodating projected population and employment growth, supported by the Province's proposed interchanges at Mayfield Road and Bovaird Drive. The proposed Transportation Corridor will accommodate inter- and intra-municipal/regional traffic, transit and goods movement across the GTA.*

*10.5.3 The City of Brampton and the Region of Peel will continue to work with the Province of Ontario on the GTA West Transportation Corridor Environmental Assessment.*

*10.5.4 Within the Focused Analysis Area and Narrowed Area of Interest, once the alignment of the Corridors has been approved as part of an Environmental Assessment, the City will undertake a review to determine if any amendments to the land use designations of the Heritage Heights Secondary Plan are required.*

The Schedule delineating the protected corridor for the Focused Analysis Area and the Narrowed Area of Interest is shown outlined in blue below:



The protected corridor is a co-located highway FAA and hydro corridor Narrowed Area of Interest. It is unfair to all the parties to the Ontario Land Tribunal Hearing, including the City of Brampton, Peel Region, and a large number of landowners, for the Province to now suddenly change its position when all relied upon the above mapping, which reflects the Provincial interest that was expressed.

The process that produced this outcome, was substantial, and extended for two decades as summarized below:

- The lands were brought into the urban area in 2006.
- Secondary planning commenced in 2009 and involved exhaustive public and agency consultation.
- Throughout, the landowners have actively participated in every aspect of the planning for the community.
- There have been several proposed land use plans that were thoroughly vetted.
- In 2022, the City approved the Secondary Plan for Heritage Heights that contemplated a “Grand Boulevard” rather than a controlled-access highway as the central transportation corridor. City Council believed this would meet the Provincial interest in moving people and goods while promoting an integrated community.
- The Ministry of Municipal Affairs and Housing (MMAH) appealed, as did many others. The main concern of the Province was the need to replace the “Grand Boulevard” with Highway 413.
- The parties engaged in a lengthy mediation between November 2023 and June 2024. While the Province did not directly participate, its interest in protecting for Highway 413 was a central issue in the negotiations. MMAH remained an appellant and a party to the hearing. Everyone understood that any plan would need to satisfy the Provincial interest in this highway or be the subject of a lengthy hearing.
- Ultimately, the mediation was successful. A modified secondary plan was endorsed by City Council that replaced the Grand Boulevard with the Highway 413 corridor. We think it is important to recognize Council’s willingness to partner with the Province in this way.
- The new Secondary Plan was approved by the Ontario Land Tribunal in late August of last year (2024).

The consequence of adoption of the new proposed Narrowed Area of Interest will be to upend the extensive process chronicled in summary form above, and require the planning process to be substantially re-examined and reassessed.



The October 10, 2025 announcement of a separated Narrowed Area of Interest for the hydro corridor causes enormous harm to the approved Heritage Heights Secondary Plan community.

Below is the plan showing the new proposed Narrowed Area of Interest outlined in blue:





The imposition of the hydro corridor, as now proposed, will break up complete communities and coherent neighbourhoods, disrupt the planned local transportation network, and make it impossible to achieve many of the land use and community planning principles upon which the plan was based. Some of the following impacts occur:

- Neighbourhoods are now divided into small, unconnected parts.
- The introduction of the new proposed hydro corridor into this carefully planned community will result in an inefficient and undesirable community form.
- Planned arterial roads are wiped out in some areas, adversely affecting the connectivity in the community.
- As a result of the interruption of the community by two separated strips of linear infrastructure, and the disruption of planned east-west road connections, severe transportation impacts are anticipated, producing significant traffic congestion.
- The amount of land experiencing an edge condition beside infrastructure (and thus the adverse impacts of the planned corridors) is significantly increased - effectively doubled or more.
- Plans for a eco-campus facility to be run by Credit Valley Conservation are significantly compromised, or effectively eliminated.
- Municipal plans for multi-purpose use of the Brampton owned “Siemens and Poretta Farm” on Bovaird will be compromised.
- Many land parcels are reduced to remnant parcel sizes that are too small, or economically inefficient to develop. The result will be to increase the cost of housing.
- The long-standing Jehovah’s Witnesses place of worship location on Bovaird is effectively wiped out.
- A large quantity of potential housing is eliminated.
- The new proposed hydro corridor conflicts with a number of locations identified for schools, or neighbourhood parks.
- Many land areas become narrow and isolated, unconnected to the balance of the community.

- The change from co-location of a single corridor to two separated corridors changes the overall character of the Heritage Heights Secondary Plan area from a community of new homes, into an area dominated by linear infrastructure. For most future residents, the dominant effect will be the feeling of neighbouring infrastructure, rather than neighbouring homes.
- The interruption of the hydro corridor will make it very difficult and costly to deliver the local infrastructure necessary to support development of the community, including sanitary sewers, water, storm water facilities, roads, active transportation linkages and more.
- There are significant impacts from the new corridor on woodlands, and on designated Provincially Significant Wetlands.

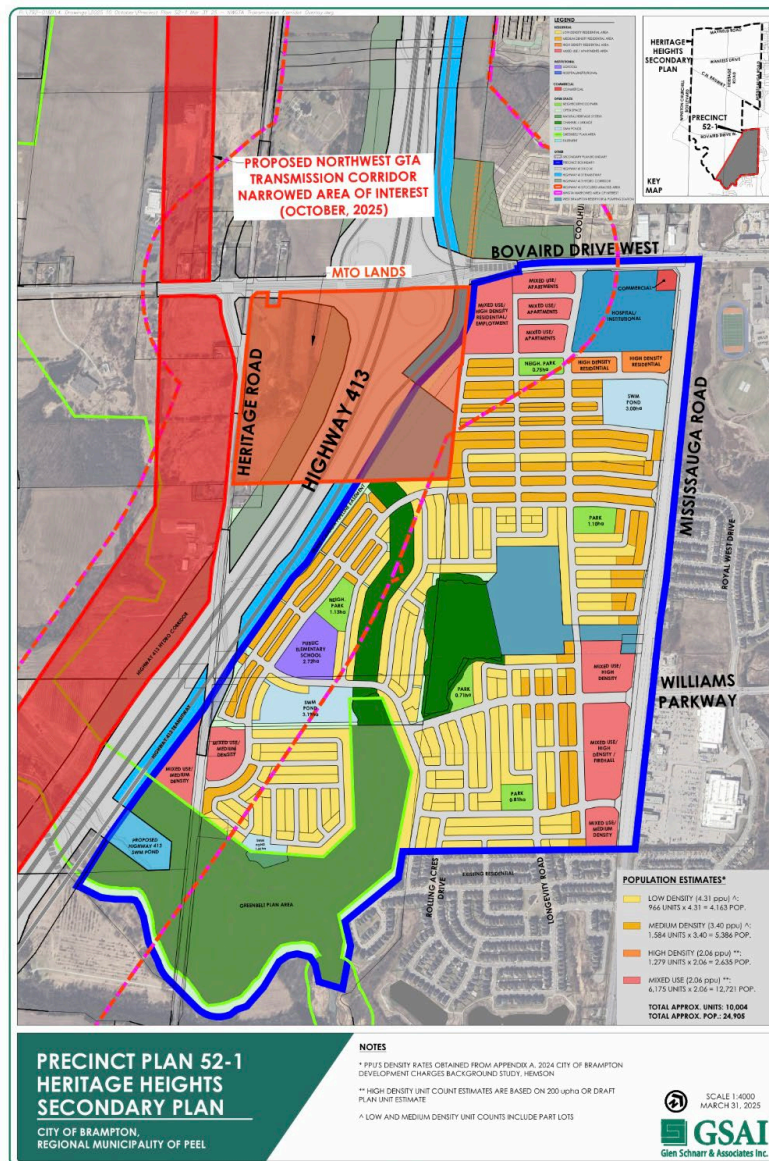
### **New Proposed Hydro Corridor Route Will Likely Result in Significantly Higher Land Acquisition Costs**

The new proposed hydro corridor location will require the taking of lands in areas that will almost certainly result in a significant increase in land acquisition costs over the previously planned co-located route adjacent to the highway. This is not in the interests of the taxpayers, or hydro ratepayers.

If the corridor is co-located adjacent to the highway, much of the route will be on remnant parcels of lands that must be acquired for the highway. As such, much of the lands on which the co-located hydro corridor would be established, will already be in public ownership. The land acquisition cost to establish the hydro corridor will be significantly mitigated.

If the hydro corridor is relocated, as now proposed, to west of Heritage road, all of the land to be acquired for it will be new, additional takings to those required for the highway corridor. This, alone, will significantly increase the land acquisition costs.

This is well illustrated by lands south of Bovaird, east of Heritage Road, that have already been acquired by the Ministry of Transportation for early works for the Bovaird interchange with the Highway 413. The lands, known as the “Great Gulf Property” were acquired for a reported \$110 million.



As the plan above shows, the originally proposed co-located hydro corridor would be located entirely within the now MTO property.

However, as the plan also shows, the newly proposed separated hydro corridor would give rise to the need for a new, and additional, acquisition of land by a public authority. Instead of efficiently minimizing costs by using lands that are already purchased by the Province, the cost of land acquisition for a separated corridor will allow no such opportunities for land acquisition efficiencies.

The same situation is anticipated along this four kilometre stretch if the corridors are separated. An entirely new corridor will need to be purchased.

In addition to this straightforward increase of land acquisition costs, there will be additional injurious affection claims made against the public authorities. As can be expected, if the interface between the negative impacts of infrastructure corridors and adjacent lands is doubled, one expects that the amount of injurious affection claims will also double.

Another consideration is the diminution of value to unacquired remnant lands. As a review of the Heritage Heights approved plan with the new proposed hydro corridor superimposed shows, if the land takings for new corridor are limited to only the lands needed for the hydro corridor (and not entire lots) there will be many remnant parcels of sizes and shapes with greatly reduced potential for practical development. This will give rise to many new additional injurious affection claims that will not arise with the originally proposed co-located corridor.

Such an avoidable escalation in land acquisition costs, including increased injurious affection claims, is very difficult to defend at any time - but especially at a time when there are so many other worthy applications for those tax dollars.

**Determination of Appropriate Location of Narrowed Area of Interest in Heritage Heights Community West of Highway Should NOT Delay The Release of Other Lands As Contemplated By October 10 Announcement - Including Release of Lands On East Side of Highway 413 Preferred Route in Heritage Heights**

It is clear that the only issue in contention in the newly proposed Narrowed Area of Interest is the potential location of the hydro corridor in the Heritage Heights community of Brampton. This relates exclusively to lands west of the preferred route of the Highway 413 in Heritage Heights.

As a consequence, if it will take time to resolve this aspect of the hydro corridor route, it should not be a reason to delay release of all other lands not required for the new Narrowed Area of Interest outside of Heritage Heights. Those lands should be released at the earliest possible opportunity. This will allow landowners and municipalities to get on with the process of building communities, delivering new housing, and encouraging economic growth and development.

Those lands that should be released as soon as possible [i.e. that can be released without awaiting the outcome of the decision on the Narrowed Area of Interest] also include ALL the lands in Heritage Heights in Brampton located on the EAST side of the preferred route of the Highway 413. These lands include significant amounts of proposed housing development, which will be able to move to the market and provide new homes for families on an expedited basis once released.

### **The Proposed New Narrowed Area of Interest Should Be Abandoned - and the Hydro Corridor Should Be Returned to a Single Co-Located Linear Corridor With the Highway 413**

For reasons of fairness and the integrity of the facility siting process, the abrupt departure from a co-located corridor in the Heritage Heights area of Brampton should be reversed. The plan for co-location of the hydro corridor and the Highway 413 - understood to be the approach for a decade or more - should be resumed.

The proposed separation of the hydro corridor from the highway corridor runs directly contrary to the primary guiding principle of the corridor identification process as set out by the Government - that of co-location of the hydro and highway corridors wherever feasible.

The new proposed hydro corridor is now intended to be on lands that have not been studied for that purpose, and whose owners have never been consulted on this possibility.

The negative impacts of the change to two separate corridors from a community building and land use perspective are substantial.

The effects of the separation of the corridors demonstrate that this move is contrary to provincial policy, both in substance and in terms of impacts. It is contrary to the requirements of the Provincial Planning Statement encouraging co-location of linear infrastructure.

Heritage Heights is the only area where such co-location is no longer proposed - and likely the portion of the proposed route where departure from the co-location principle causes the most negative impacts.

It is also contrary to the Provincial Planning Statement policy to avoid, minimize or mitigate negative impacts and adverse effects on adjacent lands. By doubling the amount of land with bordering conditions on corridors, and removing the beneficial effect of the buffering of the Highway by the hydro corridor, the proposed new route actually creates, increases and removes mitigation of negative impacts and adverse effects.

The proposed change does exactly the opposite of what Provincial policy requires.

By reducing and delaying the delivery of important housing supply, the proposed change runs directly contrary to one of the stated highest priorities of the current Provincial Government - addressing the housing supply crisis.

The hardship that will be caused to landowners and the municipality in having to replan the west side of the Heritage Heights community is enormous - and unfair at this late stage, after years of good faith reliance upon the Province's long-stated and repeated commitment to co-location of the corridors.

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The negative impact to the proposed Heritage Heights community by its shredding into disconnected strips interrupted by lengthy linear infrastructure corridors will result in a lower quality of life for the future residents of this community.

The proposal to separate the hydro corridor from the highway corridor should be abandoned - and the plan to co-locate the corridors - as intended for years and already protected for in the Heritage Heights Secondary Plan - should be resumed.

Yours truly,

AIRD & BERLIS LLP



Hon. Peter Van Loan, P.C., K.C.  
Partner

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