

October 30, 2025

Our File: 1590-001

Ministry of Energy and Mines (MEM)  
77 Grenville Street, 6<sup>th</sup> Floor  
Toronto, ON M7A 2C1

Attention: Callee Robinson, Senior Policy Advisor

**RE: Comments on Proposed Refinement of the Northwest GTA  
Transmission Corridor (ERO: 025-1133)  
Heritage Heights Secondary Plan Area  
Precinct Planning Area 52-5  
City of Brampton, Region of Peel**

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Glen Schnarr & Associates Inc. (GSAI) is the planning consultant to the Heritage Heights 52-5 Landowner Group (HHSP 52-5 LOG) who own most of the lands bounded by Winston Churchill Boulevard to the west, the CN Railway corridor to the north, the Highway 413 Transportation Corridor to the east, and Bovaird Drive West to the south in the City of Brampton (City). These lands are known as the Heritage Heights 52-5 Precinct Planning Area and are outlined on the attached Key Map (**Attachment 1**). GSAI is also the co-planning consultant (along with GWD Limited) to the broader Heritage Heights Secondary Plan Landowners Group who also intend to submit written comments to the Ministry.

On behalf of the HHSP 52-5 LOG, we appreciate receiving the notification of the proposed reduction to the transmission corridor protection area. As you know, the release of lands from the Narrowed Area of Interest will allow ongoing land development applications to advance, allow approvals to be issued, construction to proceed, and contribute to the delivery of much needed housing in this part of the GTA. We do, however, have **serious concerns** with the location of the proposed scoped study area and we respectfully request that:

- **The scoped future electrical transmission corridor study area be shifted immediately abutting the west side of the MTO's preferred Hwy 413 route as shown on Attachment 2.**

For your information, Precinct 52-5 is located within the Heritage Heights Secondary Plan which was subject to a multi-decade long planning approvals process and concluded by way of Ontario Land Tribunal decision in August 2024. The Heritage Heights Secondary Plan generally requires a precinct planning process prior to/in conjunction with advancing subdivision development applications. The precinct planning process for Precinct 52-5 was initiated through formal consultation with the City in 2023 and a formal application to establish the Precinct Plan was filed with the City in early October 2025.

Precinct 52-5 encompasses approximately 370 hectares (920 acres) and has an estimated net developable area of approximately 245 hectares (605 acres). Precinct 52-5 is expected to accommodate approximately 5,900 dwelling units, 18,700 residents and 950 jobs. The proposed Development Concept Plan for Precinct 52-5 is attached as **Attachment 2**.

As shown on the Concept Plan, we identify a conceptual 150-metre transmission corridor within the current Hwy 413 corridor protection area immediately adjacent to the proposed Highway 413 right-of-way in anticipation that the transmission corridor would be maintained within the current corridor protection area as it has been shown for several years.

In reviewing the proposed refinement of the Northwest GTA Transmission Corridor, the new 150-metre corridor is now proposed outside of the current protection area and bisects the middle of the 52-5 Precinct planning area through future key community spine roads and future developable land. The proposed alignment is inconsistent with the area that has been protected for this very purpose for many decades and significantly disrupts long-historical good planning practise and progress that has occurred outside of the current protection area. All of which was done without any consultation with the public or affected landowners. An overlay showing the proposed alignment and impact through the Development Concept is attached as **Attachment 3**.

From a planning and development perspective, we advise that the proposed alignment through the 52-5 Precinct Plan has a very detrimental effect on the City's and the HHSP 52-5 LOG's vision for a well-planned community for the following reasons:

1. The proposed alignment would surround itself with sensitive, generally low-density residential land uses on both sides. This can be substantially mitigated by locating the transmission corridor adjacent to the Highway 413 right-of-way and limiting its interface impacts with the residential community.
2. The proposed alignment would cross through an existing cemetery, existing place of worship (Assembly Hall of Jehovah's Witnesses) on the north side of Bovaird Drive, and through lands owned by the City intended for active recreational purposes, immediately south of the Precinct 52-5 area. An alignment adjacent to the Highway 413 right-of-way, as has always been shown and expected, would avoid impacts to these land uses and their current and future operations.
3. The proposed alignment would fragment Precinct 52-5 into an inefficient and undesirable development, whereas the community is intended to be walkable, well-connected, and accessible. This could otherwise be avoided by locating the transmission corridor adjacent to the Highway 413 right-of-way.
4. The location of the new proposed alignment through the middle of the residential community provides for a poor aesthetic, creates a less attractive place to live and would be riddled with land use incompatibility challenges.

5. Multiple road and pedestrian crossings of the corridor would be required to provide access through and connectivity with the community. Such crossings increase unwanted exposure and access to the transmission corridor and affect public safety.

The HHSP 52-5 LOG is very concerned, and it is our professional planning opinion that the new proposed alignment outside the current protection area is based on poor planning and is unacceptable, particularly when such corridor protection was contemplated as part of the future Highway 413 route selection process. We request that the transmission corridor alignment through the 52-5 Precinct Plan area be maintained within the current protection area and placed immediately adjacent to the Highway 413 right-of-way corridor, where it results in the least amount of impact to the proposed community and public safety.

### **Chronology of Key Events and Provincial Direction**

The coordinated planning of transportation and transmission infrastructure in the northwest Greater Toronto Area (GTA) has long been guided by a consistent Provincial direction emphasizing integration and co-location. This approach has been reaffirmed through a series of studies, and Environmental Registry postings over the past decade.

In April 2015, the Independent Electricity System Operator (IESO) released the Northwest GTA Integrated Regional Resource Plan, which first recommended that a future transmission corridor be planned in proximity to the proposed GTA West Transportation Corridor. This early directive established the foundational principle of coordinated infrastructure planning, ensuring efficiency, minimizing land use conflicts, and reducing cumulative environmental and social impacts.

In February 2018, the Ministry of Transportation (MTO) and the IESO jointly announced the Joint Corridor Identification Study, a collaborative initiative intended to identify lands suitable for multi-purpose linear infrastructure. The stated objective of this study was to protect a shared corridor for both transportation and electricity transmission purposes, thereby reinforcing the Province's integrated planning framework.

In June 2019, the Province released the Narrowed Area of Interest (NAI), which closely mirrored MTO's Focused Analysis Area (FAA) for Highway 413. This alignment reflected the continued commitment to co-location and inter-ministerial coordination. Subsequently, in March 2020, the Ministry of Energy and Mines (MEM) posted an update to the Environmental Registry confirming that Provincial policy continued to support co-location of linear infrastructure and that the hydro corridor study would be coordinated with MTO's previous corridor analyses from 2015 and 2019.

The Province reaffirmed this policy direction in November 2020 through an Environmental Registry Decision Notice, citing strong stakeholder and public support for co-location along the Highway 413 alignment. This approach was recognized as the most effective means of minimizing impacts on natural heritage features, agricultural lands, and planned community areas. The IESO's GTA West Integrated Resource Plan, published in July 2021, further confirmed that the proposed transmission corridor was anticipated to align closely with MTO's highway study area.

This direction was reiterated during joint IESO–MTO public engagement sessions held in October and December 2024, where both agencies presented materials demonstrating that the hydro corridor study remained adjacent to Highway 413 and that the NAI and FAA boundaries were “almost identical.”

In May 2025, the Province issued another ERO Decision Notice reaffirming that ongoing refinements to the corridor were informed by updated technical studies and continued to be guided by the objective of co-location. As of mid-2025, co-location remained the underlying Provincial assumption and planning basis.

However, on October 10, 2025, the MEM released a Revised Narrowed Area of Interest, which, for the first time and without any stakeholder consultation, introduced an independent hydro corridor alignment through Heritage Heights, completely disconnected from the Highway 413 route. This abrupt deviation from a decade of established Provincial direction occurred without prior consultation, technical justification, or supporting evidence. It represents a significant and unexplained departure from the Province’s long-standing commitment to coordinated and efficient infrastructure planning.

## **Policy Conflicts**

The proposed revision to the Narrowed Area of Interest for the Northwest GTA Hydro Corridor constitutes a material and unjustified departure from both Provincial policy and established planning direction. The new proposed alignment introduces a separate, four-kilometre hydro corridor west of Heritage Road within the Heritage Heights Secondary Plan area in the City, an area that had been comprehensively planned and approved based on a co-located corridor with Highway 413.

This unilateral change directly contradicts the guiding principles of the Provincial corridor identification process and the policy direction set out in the Provincial Planning Statement (PPS, 2024), which emphasizes efficient land use, co-location of linear infrastructure, and the minimization of adverse impacts on surrounding lands and communities.

## **Contravention of Co-Location Policy**

Section 3.3.5 of the Provincial Planning Statement explicitly directs that “the co-location of linear infrastructure should be promoted, where appropriate.” The proposed separation of the hydro corridor from Highway 413 disregards this clear policy directive and undermines the coordinated infrastructure planning approach that has been the hallmark of the Provincial process to date.

The principle of co-location serves to reduce the cumulative footprint of major infrastructure projects, limiting their encroachment on agricultural and natural heritage systems and minimizing disruption to established and planned communities. The decision to abandon this approach introduces unnecessary increase in adverse land use impacts and stands contrary to the objectives of efficient, integrated infrastructure planning.

### Inconsistency with the Province's Own Guiding Principles

The March 23, 2020, Environmental Registry posting titled "Proposal to Identify and Protect a Corridor of Land for Future Electricity Infrastructure in the Greater Toronto Area" identifies co-location with other linear infrastructure as the first guiding principle of corridor identification.

No technical evidence, consultation or rationale has been provided to justify deviating from this principle, nor has the Province demonstrated that co-location through Heritage Heights is not feasible. The absence of such justification undermines the transparency, integrity, and evidence-based foundation of the corridor identification process.

### Undermining the Integrity of Established Municipal and Tribunal-Endorsed Planning

The Heritage Heights Secondary Plan, approved by the Ontario Land Tribunal (OLT), was explicitly structured around a single, co-located transportation and transmission corridor. The Province previously acknowledged the adequacy of this approach by declining party status during the OLT hearing, recognizing that the plan appropriately protected both the FAA and NAI.


Introducing a new, independent hydro corridor through Heritage Heights would invalidate years of coordinated planning between Provincial ministries, the City, the Region of Peel and affected landowners, as well as substantial public and private investment in the development of a fully integrated community structure.

We appreciate the opportunity to provide these comments and respectfully request that the MEM give due consideration to the issues raised. The recent change to the corridor alignment represents a fundamental shift in Provincial direction and policy consistency that warrants immediate reconsideration.

We intend to raise these concerns with our elected representatives at both the municipal and Provincial levels and would welcome the opportunity to meet with Ministry staff to discuss the matter further, ideally in person, failing that virtually. Should you have any questions or require additional information, please do not hesitate to contact the undersigned.

Sincerely,

**GLEN SCHNARR & ASSOCIATES INC.**



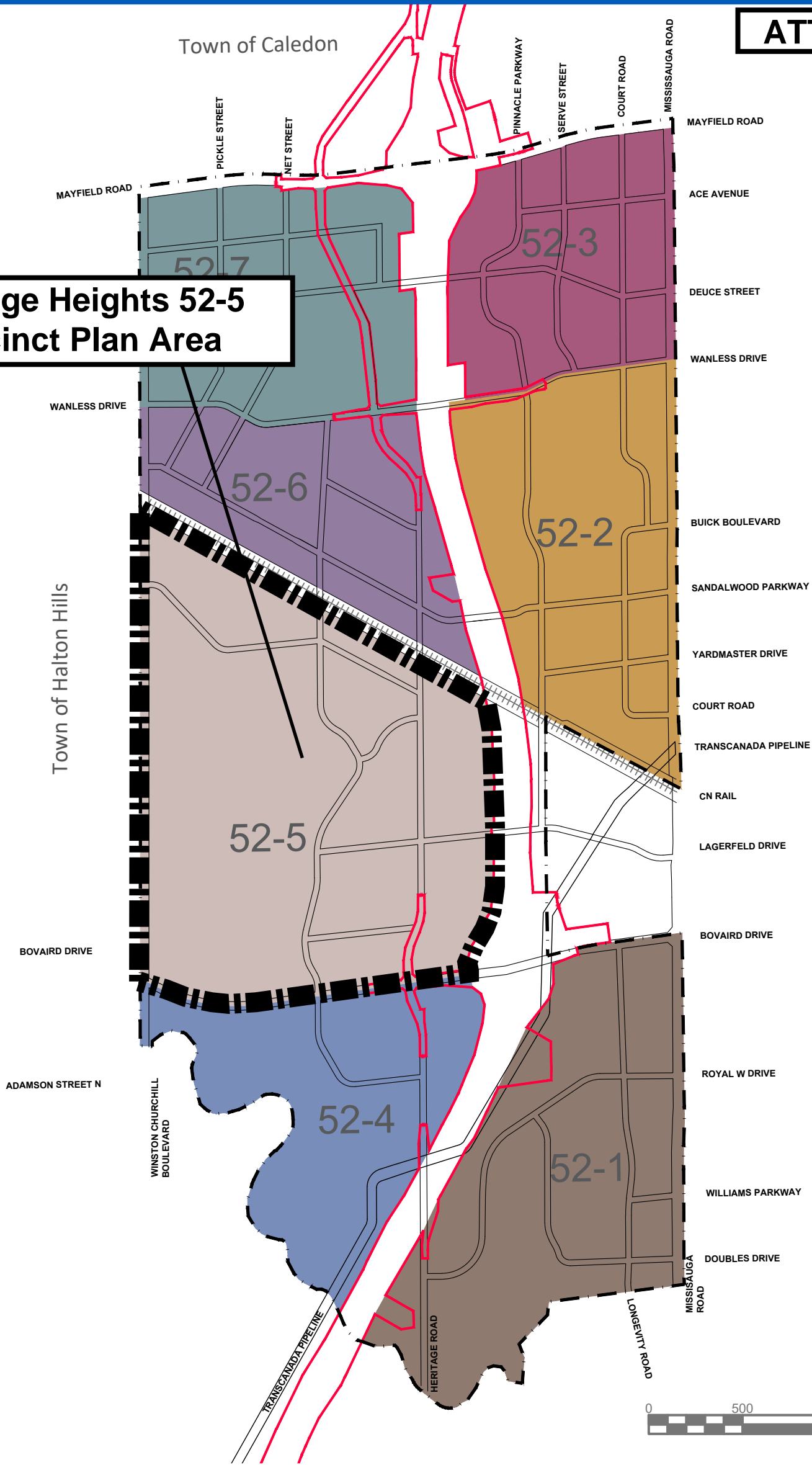
**Jason Afonso, MCIP, RPP**  
Partner



Encl.

- c. HHSP 52-5 LOG  
Mayor and Members of City Council  
Steve Ganesh, Commissioner of Brampton Planning

Heritage Heights 52-5  
Precinct Plan Area

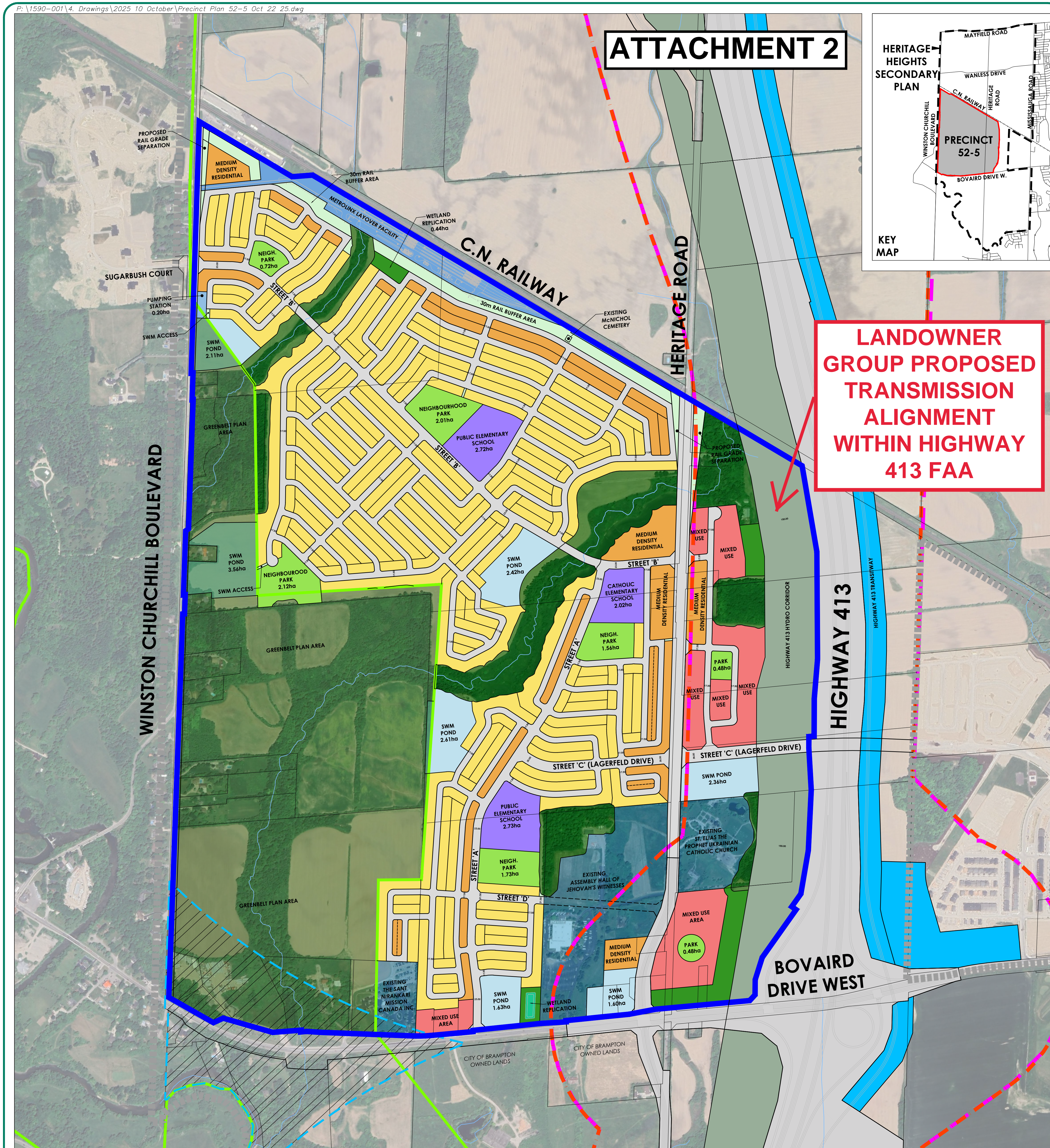


LEGEND

- Secondary Plan Area
  - Existing Street Network
  - Proposed Street Network
  - Existing Rail Line
  - Preliminary Highway & Transitway Right-Of-Way Design
- \*Data from Highway 413 Interactive Mapping




52-1	52-5
52-2	52-6
52-3	52-7
52-4	








## TOTAL SITE STATS



## UNIT ESTIMATES

	LOW DENSITY (30 upnha): 75.58ha x 30 upnha = 2,267 UNITS
	MEDIUM DENSITY (60 upnha): 17.99ha x 60 upnha = 1,079 UNITS
	MIXED USE (200 upnha): 12.95ha x 200 upnha = 2,590 UNITS

## POPULATION ESTIMATES\*

	LOW DENSITY (4.31 ppu): 2,267 UNITS x 4.31 = 9,770 POP.
	MEDIUM DENSITY (3.40 ppu): 1,079 UNITS x 3.40 = 3,668 POP.
	MIXED USE (2.06 ppu): 2,590 UNITS x 2.06 = 5,335 POP.

### EMPLOYMENT ESTIMATES\*

	MIXED USE (GFA @ 25% LAND AREA): 12.95ha x 25% GFA = 32,375m <sup>2</sup> 40m <sup>2</sup> PER EMPLOYEE = 809 EMPLOYEES
	ELEMENTARY SCHOOLS 50 EMPLOYEES PER SCHOOL 3 SCHOOLS x 50 = 150 EMPLOYEES
<b>EMPLOYMENT TOTAL: 959 EMPLOYEES</b>	




\* NOTE: PPU'S AND EMPLOYMENT DENSITY RATES OBTAINED FROM APPENDIX A, 2024 CITY OF BRAMPTON DEVELOPMENT CHARGES BACKGROUND STUDY, HEMSON

# HERITAGE HEIGHTS PRECINCT PLAN 52-5

**CITY OF BRAMPTON,  
REGIONAL MUNICIPALITY OF PEEL**

## LEGEND

**RESIDENTIAL**

-  LOW DENSITY RESIDENTIAL AREA  
 MEDIUM DENSITY RESIDENTIAL AREA  
 MIXED USE AREA








## INSTITUTIONAL

-  SCHOOLS
-  EXISTING INSTITUTIONAL

## OTHER

- LEGEND**
- SECONDARY PLAN BOUNDARY
  - PRECINCT BOUNDARY
  - HIGHWAY 413 R.O.W.
  - HIGHWAY 413 TRANSITWAY
  - HIGHWAY 413 HYDRO CORRIDOR
  - HIGHWAY 413 FOCUSED ANALYSIS AREA
  - NWGT A NARROWED AREA OF INTEREST
  - METROLINX LAYOVER FACILITY
  - EAST-WEST CONNECTION FOCUS AREA
  - PUMPING STATION

## OPEN SPACE

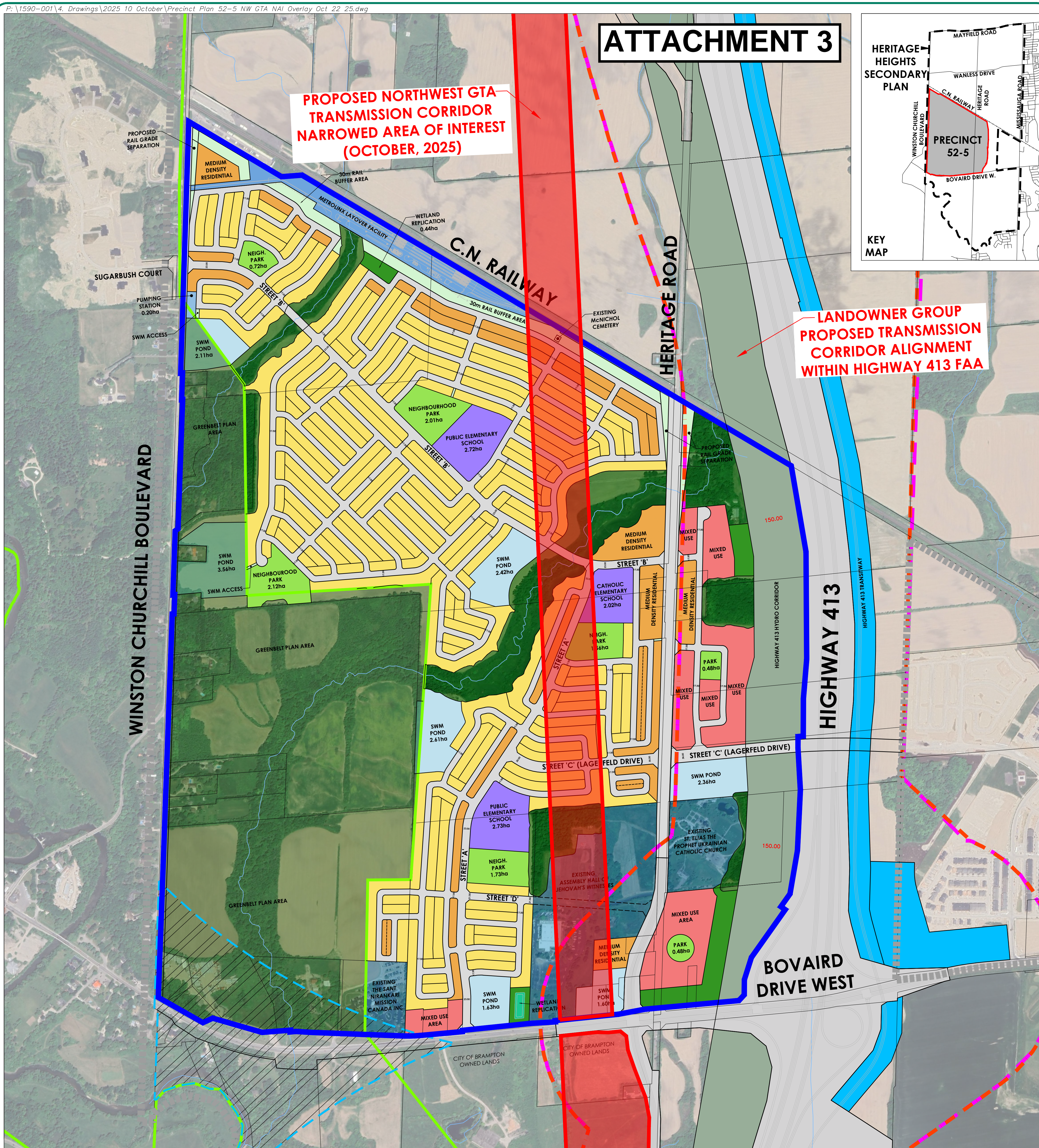
-  NEIGHBOURHOOD PARK
-  OPEN SPACE
-  NATURAL HERITAGE SYSTEM
-  CHANNEL / LINKAGE
-  SWM PONDS
-  SWM PONDS WITHIN NHS
-  GREENBELT PLAN AREA



SCALE 1:5000  
OCTOBER 22, 2025







# HERITAGE HEIGHTS PRECINCT PLAN 52-5

**CITY OF BRAMPTON,  
REGIONAL MUNICIPALITY OF PEEL**

## LEGEND











**RESIDENTIAL**

-  LOW DENSITY RESIDENTIAL AREA  
 MEDIUM DENSITY RESIDENTIAL AREA  
 MIXED USE AREA

## INSTITUTIONAL

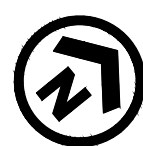
-  SCHOOLS
-  EXISTING INSTITUTIONAL

## OTHER

-  SECONDARY PLAN BOUNDARY
-  PRECINCT BOUNDARY
-  HIGHWAY 413 R.O.W.
-  HIGHWAY 413 TRANSITWAY
-  HIGHWAY 413 HYDRO CORRIDOR
-  HIGHWAY 413 FOCUSED ANALYSIS AREA
-  NWGTA NARROWED AREA OF INTEREST
-  METROLINX LAYOVER FACILITY
-  EAST-WEST CONNECTION FOCUS AREA
-  PUMPING STATION

## OPEN SPACE

- OPEN SPACE**
- NEIGHBOURHOOD PARK
  - OPEN SPACE
  - NATURAL HERITAGE SYSTEM
  - CHANNEL / LINKAGE
  - SWM PONDS
  - SWM PONDS WITHIN NHS
  - GREENBELT PLAN AREA



**GSAI**  
Glen Schnarr & Associates Inc.