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November 7, 2025

Via Email: MinisterEnergy@ontario.ca

Via: ERO Portal

To: Honourable Stephen Lecce
Ministry of Energy and Mines
77 Grenville Street, 10th floor
Toronto, ON M7A 2C1
Legislative Assembly of Ontario

And To: Callee Robinson
Senior Policy Advisor
Ministry of Energy and Mines
77 Grenville Street, 10th floor
Toronto, ON M7A 2C1

Dear Minister Lecce and Ms. Robinson;

Re: ERO Number 025-1133

**Refining a Protected Corridor of Land for Future Electricity Transmission
Infrastructure in the Northwest Greater Toronto Area**

**Submissions on Behalf of the Northwest Brampton Landowners Group
Inc./Heritage Heights Landowners Group ("NWBLG")
Our File No. 13154**

We are counsel to the Northwest Brampton Landowners Group Inc./Heritage Heights Landowners Group ("NWBLG"). The members of the NWBLG own some 1,364 acres of land within the Heritage Heights Secondary Plan ("HHSP") in the City of Brampton ("City"). Our client is by far the largest landowner in the HHSP and has been active in all aspects of the planning for this community for over 20 years.

**Reaction to the Relocation of the Narrowed Area of Interest ("NAI") for the Transmission
Corridor Within the HHSP has been Swift and Stark**

By now you will have seen the submissions of numerous stakeholders to the proposal to abandon co-locating the hydro transmission corridor ("Corridor") with Highway 413 ("Highway") through about four kilometres of the HHSP. For the first time in more than six years of study, and despite the recent approval by the Ontario Land Tribunal of the Secondary Plan for this community that co-locates the Corridor with Highway 413 throughout its length, a portion of the NAI has been relocated to the west. This leaves an awkward gap of land between the Highway and the Corridor and drives a separate piece of linear infrastructure through the heart of the community.

In so doing, the Independent Electricity System Operator (“IESO”) and the Ministry of Energy and Mines (“Ministry”) have not only departed from the first “Guiding Principle” of the study process (to co-locate linear infrastructure), and proposed something that is at odds with Provincial Policy (to promote the co-location of linear infrastructure), but have also generated universally negative comments from every stakeholder in the HHSP: from the City to the Credit Valley Conservation Authority, and from every landowner. As far as we know, there is not a single supportive submission to this remarkable deviation. And even if a few landowners who may seek to benefit from the relocation emerge, they will certainly be in the tiny minority of voices.

We will not repeat these submissions, but we are attaching four examples that thoroughly capture the severe community planning, housing delivery and ecological impacts that would be caused by abandoning the principle of co-locating linear infrastructure in the HHSP:

1. Submission of the City of Brampton (Attachment 1);
2. Submission of Credit Valley Conservation (Attachment 2);
3. Submission of the Hon Peter Van Loan (Attachment 3) and
4. Submission of Bruce and Shirley Reed (Attachment 4).

To be succinct: our client adopts and endorses the litany of negative impacts set out in these submissions.

What is Driving the Relocation of the NAI?

The NWBLG is fully aware of the provincial interest in securing the efficient delivery of electricity in the province. Our client recognizes that the Guiding Principle of co-locating linear infrastructure is subject to a caveat: “wherever feasible”.

Upon learning of the proposed re-location of the NAI for the first time on October 10th, the NWBLG immediately set out to understand what was making the long-standing co-location of the NAI with Highway 413 suddenly unfeasible in the HHSP, and only within the HHSP.

Unfortunately, there was absolutely no explanation in the ERO posting or any related documentation from the IESO or the Ministry for the deviation. While the ERO posting claims that the Ministry engaged with stakeholders to gather feedback on the Corridor’s design, there was absolutely no engagement with stakeholders on the relocation of the NAI prior to the ERO announcement.

As set out in the City’s submission, Ministry and IESO staff did subsequently meet with City staff to discuss the technical justification for the deviation. A representative of the NWBLG also attended this meeting. City staff requested additional information from the Ministry/IESO that has not yet been forthcoming.

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Regardless, we understand that there are essentially three issues that drove the recommendation to relocate the NAI and abandon co-location with Highway 413:

1. The Ministry of Transportation is proposing to locate a maintenance yard at the northwest corner of the interchange of Mayfield Road and Highway 413. This “pushed” the transmission Corridor further west to avoid the conflict;
2. The alignment of Highway 413 between Wanless Drive and Bovaird Road is too curvilinear for the proposed Corridor to follow its path, resulting in a more-or-less straight-line relocation of the Corridor; and
3. The proposed overpass of Highway 413 at Bovaird Road is too elevated to maintain a co-located location.

Again- these issues were posited without any written or technical explanation or justification.

The Technical Issues Raised by the IESO/Ministry Can be Solved Without Abandoning the Co-Location of the Corridor with Highway 413

While the members of the NWBLG are experts in community planning and the delivery of housing, they recognized that they lack the technical capacity to evaluate these transmission Corridor issues. In order to be as constructive as possible, the NWBLG immediately retained a highly regarded expert in hydroelectric transmission line engineering to assist in addressing these issues. All our expert does, and has done for the last 20-plus years, is design transmission lines. He has a related PhD in this field and is a professional engineer.

In short and recognizing that this is at a high level at his stage, our expert described these issues as “routine design challenges”. There are various cost-effective solutions to these design challenges that would not render co-locating the Corridor with Highway 413 unfeasible.

With respect to the proposed maintenance yard, we are advised that with adequate information about the proposed maintenance yard’s footprint and operational requirements, it is entirely feasible to co-locate the transmission corridor within or adjacent to the maintenance yard. This is, in fact, a well-established practice in infrastructure planning. Areas such as maintenance yards, parking lots, storages or other non-habitable facilities are often used for transmission line alignments since they do not conflict with residential or commercial developments. Co-location in such areas optimizes corridor use, minimizes additional land acquisition, and aligns with provincial objectives for efficient land utilization.

As for the curvature issues, there is no doubt that a “straight line” may be easier for transmission line design. But the modifications necessary to preserve a co-located Highway/Corridor that would fulfill provincial policy and support good community planning and the timely delivery of housing are well known, regularly implemented and entirely feasible.

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Finally, in respect of the overpass concerns, we are advised that it is very common for linear infrastructure - such as transmission lines, highways, and distribution lines - to cross one another. In such cases, the vertical profile of one of the infrastructures, typically the transmission line, can be adjusted to achieve the necessary clearance requirements. The required design adjustments (e.g., tower height modifications, span length optimization, and conductor clearance verification) are standard engineering practices and can be implemented without impacting safety, operation, or other considerations.

Again, none of these design challenges would make co-locating the Corridor with the Highway unfeasible.

Furthermore, any preference for a “straight line” corridor on the basis of cost would need to also consider the considerable costs associated with relocating the Corridor. To that end, we asked Mark Penney of MPR Advisors Planning and Appraisal to calculate the anticipated costs of relocating the corridor. Mr. Penney considered the following:

- Net loss of developable land area (net of lands “released” from the former corridor alignment);
- Injurious affection to the lands situated between the new Corridor and Hwy 413 and caused by the new “edge condition”; and
- Disturbance damages such as additional carrying costs resulting from the delay in development.

At a high level, he concluded that the cost would exceed 200 million dollars.

This cost does not account for many of the community planning issues identified by the City and others and the significant loss in potential housing units.

What’s Next?

It is quite possible that the Ministry/IESO were unaware of the severe implications to community planning and the delivery of housing presented by the proposed relocation of the NAI in the HHSP. Afterall, the experts in community planning and housing delivery are found in the residential development industry and the City, not the IESO. And surely the whole point of the ERO posting and consultation is to listen and respond to comments, not merely to confirm a pre-ordained outcome.

We are mindful of and endorse the advice that Hydro One offered to the Ministry early on in this process:

“We echo the importance of: strategic co-location of transmission infrastructure with other linear infrastructure corridors; planning for the most cost-effective option; minimizing impacts to agricultural lands, natural heritage and hydrologic

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features; minimizing impacts on existing municipal plans including built-up areas and planned developments; and, providing flexibility to respond to the future needs of this growing region.

We encourage that the study principles also seek out opportunities for positive impacts on the environment (e.g. natural, socio-economic and cultural). Community consultation, engagement and education are integral part of the planning process for new transmission infrastructure. We recommend that the guiding principles also capture the importance of community engagement as this will be vital to the success of the future project.” (Hydro One June 8, 2020 Submission; Attachment 5)

The Ministry now has the input from stakeholders and should use that input to “shape this proposal”, as the ERO Notice itself states, abandoning the relocation and returning the Corridor to be co-located with Highway 413. This would be the most efficient and effective outcome that would allow all facets of infrastructure and community planning to proceed apace.

In the event that the Ministry is not yet prepared to do so, we respectfully request that the Ministry establish a Task Force to examine the Corridor challenges in the context of the planning for the HHSP. The Task Force should include representatives of the Ministry, the Ministry of Transportation, the IESO, the City and the NWBLG. As mentioned, the NWBLG has retained a leading expert in transmission corridor design and our client will bring all of its resources to bear to assist in finding a solution that meets the needs of all stakeholders. If the other parties to the Task Force do the same, we are confident that a solution will be found.

Should the Ministry decide a Task Force is the next step, it can nevertheless narrow the NAI and release lands accordingly outside of the HHSP. Further, should the Task Force conclude that additional time is necessary to examine the challenges and options, the Task Force should immediately determine what lands within the HHSP can also be released from the NAI so that critical lands for development within the HHSP can proceed with approvals in a timely manner.

If the first option to return the Corridor to be co-located with Highway 413 is not accepted, it is essential for the Task Force to be established immediately and tasked with resolving these issues so that a final decision on the NAI can be made as soon as possible, and certainly no later than the anticipated finalization of the Highway 413 alignment and the related release of the Focused Analysis Area (FAA) in the first quarter of 2026.

Conclusion

The issues that drove the proposed relocation of the NAI are routine design challenges. There is no need to abandon provincial policy and good planning to meet the energy needs of the people of Ontario. The co-location of the Corridor and Highway 413 can and should be preserved.

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Yours truly,



Scott Snider

Yours truly,



Shelley Kaufman

Copy: Mayor Patrick Brown and Members of Brampton Council

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Sssknd
Att'd.
13154/228

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1. SUBMISSION OF THE CITY OF BRAMPTON



RE: Environmental Registry of Ontario Posting #025-113 – Refining a protected corridor of land for future electricity transmission infrastructure in the Northwest Greater Toronto Area, under the *Planning Act*

From: Steve Ganesh, Commissioner – Planning, Building and Growth Management Department, City of Brampton

To Whom It May Concern,

The City of Brampton (hereinafter referred to as ‘the City’) appreciates the opportunity to provide comments on the proposed changes outlined in the Environmental Registry of Ontario posting 025-113 – Refining a protected corridor of land for future electricity transmission infrastructure in the Northwest Greater Toronto Area, made under the *Planning Act*.

The City is supportive of efforts by the Province to reduce the Narrowed Area of Interest (NAI), thereby releasing critical lands for development in the Heritage Heights Secondary Plan (HHSP) area.

However, the City is concerned about the impact of the relocated NAI, and the significant land use, transportation, and environmental impacts the transmission corridor will have on the City. This relocation of the NAI does not consider the OLT-approved HHSP, the ongoing technical studies in support of the HHSP, and existing development applications that are moving through the development approvals process. These revisions will cause significant delays, halting much needed housing and job creation in 4,000 acres of Brampton forcing the secondary plan to start from scratch.

The proposed NAI and any deviation from the existing NAI is not supported by the City of Brampton for the following reasons:

1. The proposed refinements do not optimize Brampton’s remaining greenfield lands by effectively co-locating the NAI and Highway 413;
2. The proposed NAI pauses the completion of technical studies that support growth and development in Heritage Heights, impacting the ability to proceed with development in the near-term;
3. The proposed changes do not mitigate impacts to the natural environment;
4. The proposed NAI impacts in-progress development applications and City-owned lands; and
5. The proposed NAI is inconsistent with Provincial Policy and previous materials shared by the Ministry and IESO.

The Province was a party to the appeal of the Heritage Heights Secondary Plan. However, during the appeal process, the Province declined to participate in the mediation process and

the hearing itself, indicating that they were satisfied with the approach all parties were taking to protect and plan for Highway 413 and the transmission corridor. The NAI was accounted for in Section 10.5 and Schedule 52-6 of the HHSP.

The proposed NAI contravenes the extensive process that began in 2006, which culminated in the current OLT-approved HHSP in 2024. This represents a nearly two-decade-long process to finalize the approved HHSP in its current form.

The City requests that the Province relocate the proposed NAI to be adjacent to Highway 413, as outlined in the Provincial Policy Statement (PPS), the principles of the Northwest Greater Toronto Area GTA Transmission Corridor Identification Study (the “Study”), and all published materials by the Ministry prior to October 10th, 2025. This ensures the highest, best use of land by co-locating major facilities to reduce lost or sterilized lands in Brampton’s last remaining greenfield area that supports population, housing and employment growth aligned with provincial goals and objectives.

Please see below for our specific comments on the Proposed NAI:

1. The proposed refinements do not optimize Brampton’s remaining greenfield lands by effectively co-locating the NAI and Highway 413

The proposed NAI does not reflect the previous alignment of the NAI/FAA and transmission infrastructure, removing the once co-located NAI from the Highway 413 as seen in the subject area in Figure 1 and Figure 2. In all previous materials shared by the MEM and the MTO, the Province indicates alignment between the two facilities in an effort to minimize impacts to local municipalities by efficiently co-locating the transmission corridor and Highway 413. With the above in mind, it was expected that the proposed transmission corridor would be located within the existing NAI/FAA. To this end, it has been included in all decision-making related to the development of the HHSP and associated technical studies.

Figure 1:
October 2025 Proposed Narrowed Area of Interest (Yellow) and May 2025 Narrowed Area of Interest/ Focused Analysis Area (Blue)

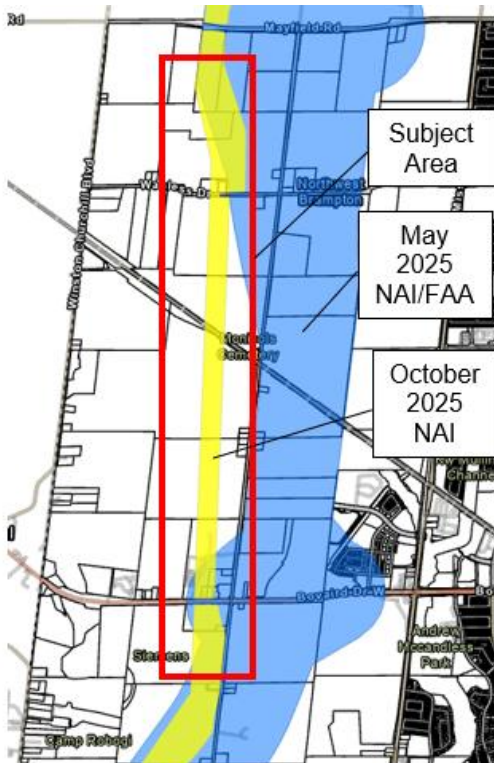
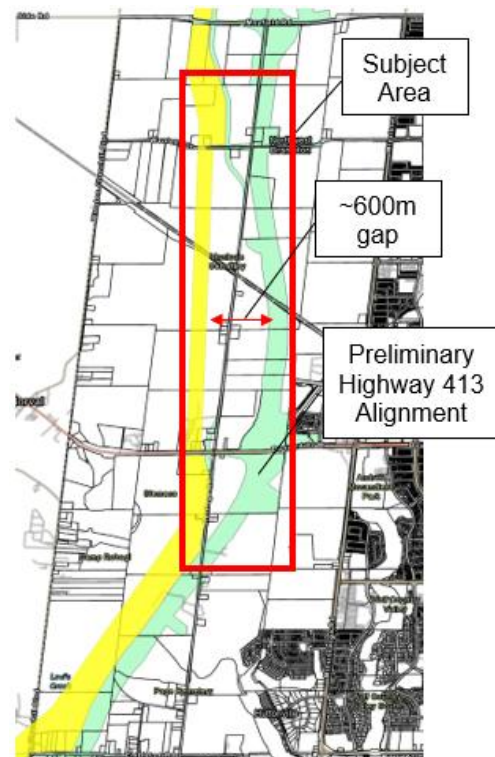


Figure 2:
October 2025 Proposed Narrowed Area of Interest (Yellow) and Preliminary Highway 413 Alignment (Green)



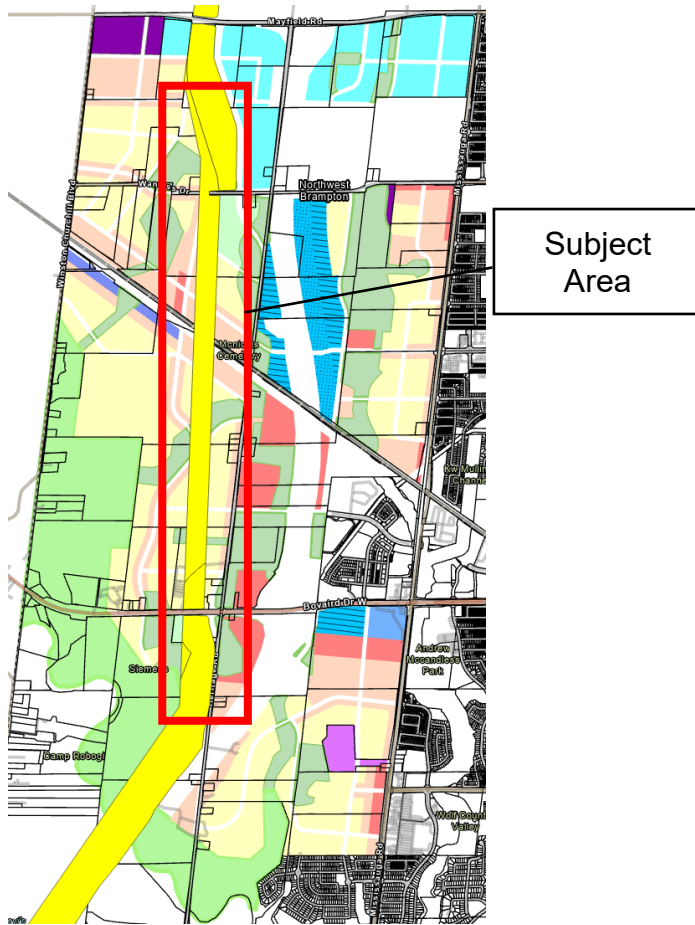
Deviation from the co-location of the NAI and FAA presents significant land use, transportation, and environmental concerns, resulting in:

- inefficient land use patterns,
- disruption of the planned street network, and
- impacts approved and in-progress technical studies in the HHSP area.

The City's preference is to have the transmission lines co-located with the future highway/transitway to minimize the impacts of community planning by not further dividing the western half of Heritage Heights, which has already been impacted and separated from the rest of the city by Highway 413. The proposed NAI would leave multiple strips of residential development between the transmission corridor and the future highway/transitway. This land use pattern is not desirable or efficient and would require restructuring the entire HHSP.

The existing HHSP land use structure and the proposed NAI are shown in Figure 3. The existing HHSP is a result of almost 20 years of consultation, revisions, and mediation, where all parties, including the Province, have already agreed on how Heritage Heights should grow into a complete, connected, community.

Figure 3: October 2025 Proposed Narrowed Area of Interest (Yellow) and Heritage Heights Secondary Plan Schedule 52-6 (Land Use Structure)



2. The proposed NAI pauses the completion of technical studies that support growth and development in Heritage Heights, impacting the ability to proceed with development in the near-term

To implement the OLT-approved HHSP, the City has undertaken numerous Secondary Plan-wide studies that have been completed or are in progress. Should the proposed NAI be implemented, previously approved and in-progress technical reports will need to be revised or halted, with updates reflecting the new alignment of the transmission corridor and new land use structure that will significantly delay project timelines and long-term planning and development objectives of the area. Revising the technical studies would also result in a significant loss of staff time, resources, and taxpayer funds already spent by the City on technical studies.

The policies in the HHSP require the secondary-plan technical studies to be substantially complete before moving forward with the development approvals process. The technical studies which impact all of the HHSP area would have to be revised, effectively halting the growth and development of the entire HHSP area.

Additionally, Precinct Planning throughout Heritage Heights is underway. Many of the studies (TIS, EIR, FSR, etc.) already submitted to the City rely on the secondary plan-wide technical studies, causing the precinct plan technical studies to be revised as well. The updates to the precinct planning process effectively require applicants to start their development approvals process from the beginning.

A significant amount of staff time and resources have been dedicated to processing submitted development applications. Revising the precinct planning studies to reflect the proposed NAI and the updates to the secondary plan-wide technical studies would result in a significant loss of staff time and resources.

A list of the impacted HHSP studies is included below.

Table 1: Heritage Heights Secondary Plan Policy and Technical Studies Impacted by the Proposed NAI

| Secondary Plan Policy / Study | Proposed NAI Impact |
|---|---|
| OLT-Approved Heritage Heights Secondary Plan Schedule 52-6 (Land Use Structure) | The land use structure in the subject area will need to be revised to reflect the new alignment of the transmission corridor, and the adjacent land uses may need to be altered to create an efficient and desirable land use structure. |
| Heritage Heights Transportation Master Plan (HHTMP) | <p>The HHTMP follows the Municipal Class Environmental Assessment (MCEA) process. Under this process, any significant changes, such as the proposed alignment of the transmission corridor, would require revising the proposed street, transit, and active transportation networks. Specifically, changes to intersection locations, transit routing, and active transportation crossings and infrastructure would be required. The proposed NAI creates an inability to provide north-south connectivity, specifically in Precinct 52-5.</p> <p>These major revisions would require the City to complete additional public and stakeholder consultation. HHTMP completion would be delayed until 2026 (currently scheduled to be completed in Q4 2025).</p> |
| Heritage Heights Subwatershed Study (HHSWS) | Revisions to the land use structure will require updates to the in-progress HHSWS. HHSWS completion would be delayed until Q4 2026 (currently scheduled to be completed in Q2 2026). |
| Heritage Heights Infrastructure Servicing Study (HH ISS) | The HH ISS was completed and approved by the City in Q3 2025. The completed and approved study will have to be revised to reflect the proposed NAI. |

3. The proposed changes do not mitigate impacts to the natural environment

City staff have conducted a preliminary analysis of the environmental impacts of the proposed NAI. Findings indicate three Natural Heritage System features within the proposed NAI that are identified as Provincially Significant Wetlands, Significant Woodlands, and areas of High Constraint, as identified in the in-progress Heritage Heights Subwatershed Study. The Credit Valley Conservation Authority has further identified impacts related to responsibilities in their purview, as it impacts the City of Brampton's natural heritage features in their ERO submission.

4. The proposed NAI impacts in-progress development applications and City-owned lands

Ten landowners in the Heritage Heights Area are directly impacted by the proposed NAI, including the City of Brampton. The proposed NAI directly impacts Precincts 52-4, 52-5, 52-6, and 52-7 of the HHSP, which is the entire HHSP west of Highway 413. The most significant impacts are in Precincts 52-5 and 52-6, where the proposed NAI deviates from the existing NAI as shown in Figure 1. However, Precincts 52-1, 52-2, and 52-3, are also impacted by the proposed NAI since the technical studies are secondary-plan-wide studies.

The pre-consultation development application in Precinct 52-5 accounts for approximately 18,900 people and 1,200 jobs. The Precinct 52-5 pre-consultation application accounts for the existing NAI and has protected land for the proposed transmission corridor adjacent to Highway 413, per the direction previously provided by the Province. The City anticipates the development application will advance through the development approvals process in Q4 2025.

The development application in Precinct 52-5 will be significantly impacted by the proposed refinements to the NAI, resulting in the loss of medium and low-density residential units, an elementary school, a neighbourhood park, and critical stormwater management infrastructure across approximately 13 ha of land (32 acres). Should the proposed refinements to the NAI proceed, the development application will likely need to be revised, setting back approval timelines, delaying the City and the Province's objectives of building complete communities.

The proposed NAI also impacts the Metrolinx layover facility, an existing cemetery, and a place of worship. The City of Brampton owns a parcel of land south of Bovaird Drive, previously known as the Siemens and Poretta Farm at 2719 and 2951 Bovaird Dr. The proposed NAI would designate a small amount of additional land from the City for the transmission corridor.

5. The proposed NAI is inconsistent with Provincial Policy and previous materials shared by the Ministry and IESO.

The proposed NAI is inconsistent with the following Provincial Policy documents, plans, and information shared by the Province:

Provincial Planning Statement (PPS)

The following policies from the PPS, 2024 are applicable to the NWGTA transmission corridor:

Policy 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.

Policy 3.3.5 - "The co-location of linear infrastructure should be promoted, where appropriate"

The HHSP was found to be consistent with policies in the PPS when it was approved by the OLT. This approval by the OLT was based upon the understanding that the hydro corridor would be co-located with the Highway 413.

The principle of avoid, minimize and mitigate negative impacts and adverse effects from the planned corridors under the PPS is not satisfied with the proposed NAI. The deviation from a co-located corridor introduces two linear infrastructure corridors for the local community, fracturing the HHSP into three sections, rather than two.

Additionally, with the transmission corridor adjacent to Highway 413, the transmission acts as a buffer between the highway and adjacent lands to the west. If a transmission corridor is required, it is more desirable to utilize the transmission corridor as a buffer between a 400-series highway and adjacent land uses rather than relying on other mitigation measures, similar to other areas in the GTA, such as Highway 407. With the proposed NAI, the benefit of mitigating highway impacts is lost as the buffer is removed.

Energy for Generations

Chapter 3, Page 75 – "...maximize the use of existing corridors and co-locate transmission with other linear infrastructure, where possible, thereby ensuring that we can meet transmission needs while minimizing impacts to land."

"...revise the narrowed area of interest, adjacent to the future Highway 413"

As the proposed NAI deviates from the Highway 413 corridor, there is now a 600 metre gap at its widest point between the proposed transmission corridor and the Highway. This gap directly conflicts with the principles set out in the Energy for Generations plan published by the MEM, where the Northwest GTA Transmission corridor should maximize the use of existing corridors and co-locate with other linear infrastructure.

ERO Posting 025-1133 – Refining a protected corridor of land for future electricity transmission infrastructure in the Northwest Greater Toronto Area – October 10, 2025

The ERO posting identifies the following guiding principles from the NWGTA Transmission Corridor Identification Study:

- *Maximize co-location with Highway 413 to minimize land impacts, consistent with provincial policy under the Provincial Policy Statement;*

- *Minimizes environmental impacts; and*
- *Provide certainty to municipal planners, landowners and developers.*

The proposed NAI is in direct conflict with the guiding principles in the Study and in the ERO posting listed above. The proposed NAI is not co-located with Highway 413 in the HHSP area and CVC has identified significant environmental impacts with the proposed NAI. Additionally, the City believes that the Province is not “providing certainty to municipal planners, landowners, and developers”. By moving the proposed NAI outside of the existing NAI in the Heritage Heights area, the Province has not provided certainty to the City, landowners, and developers. Since 2019, the direction from the Province indicated that the transmission corridor would be located within the current NAI, adjacent to Highway 413. After a lengthy appeal and mediation process, the OLT approved the HHSP in 2024 and the City has invested a significant amount of time and resources to implement the HHSP, a plan that is almost 20 years in the making. By deviating from the current NAI, there is significantly less certainty around land use planning decisions in the Heritage Heights community, as the City, landowners, and developers will be forced to revise all of our supporting technical studies, precinct plans, and development applications to reflect the proposed NAI, should it proceed as proposed. These revisions will cause significant delays.

Materials Shared by the Province

Since 2019, it has been communicated by the Province and the IESO through various materials such as press releases, planning documents, studies, webinars, and ERO postings that have identified that the alignment of the transmission corridor with Highway 413 was a guiding principle and a key factor in the planning process.

Below is a list of materials shared by the Province and the IESO that identifies the co-location of the transmission corridor with Highway 413:

- **June 2019** - Northwest GTA Transportation Corridor Identification Study Notice
- **March 23, 2020** – ERO Posting 019-1503 - 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
- **November 18, 2020** - ERO Posting 019-1503 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
- **July 2021** – IESO Greater Toronto Area West (Peel/Halton) Integrated Regional Resource Plan
- **October 29, 2024** - IESO GTA West Regional Electricity Planning Engagement Webinar Deck
- **December 9, 2024** - ERO Posting 019-9453 - Ministry of Transportation - Highway 413 Focused Analysis Area and Northwest GTA Transmission Corridor Narrowed Area of Interest Refinements
- **June 2, 2025** - GTA West Regional Electricity Planning webinar

- **May 2, 2025** - ERO Posting 019-9453 Notice of Decision - Ministry of Transportation - Highway 413 Focused Analysis Area and Northwest GTA Transmission Corridor Narrowed Area of Interest Refinements

The current ERO posting is the first time that the City was made aware that the proposed NAI would deviate from the current NAI, causing major impacts to the HHSP, associated technical studies, and development applications.

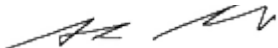
City staff met with the MEM and IESO to discuss the proposed NAI and associated impacts to the HHSP area but have not received requested additional information.

City staff met with MEM and IESO staff on October 20th, 2025 and October 24th, 2025, to discuss the proposed NAI and the technical justification for the deviation of the proposed NAI from the current NAI. The MEM submitted a list of questions to City staff, asking for additional details regarding the impacts on the HHSP area, technical studies, and development applications. City staff provided written responses on October 24th, 2025 to MEM. On October 24th, 2025, City staff requested additional information from MEM and IESO staff with an agreement that additional information would be shared by October 31st, 2025. At the time of writing this letter, City staff have not received the requested information, nor have staff heard back from the MEM/IESO staff.

The City of Brampton would like to thank the Province for the opportunity to provide feedback and comments on the proposed changes. The City requests that it be consulted further on the proposed changes and in particular be given an opportunity to engage on the preferred alignment of the NAI.

On behalf of the City of Brampton, Mayor Patrick Brown has submitted a letter to the Minister of Energy and Mines via email in response to the proposed NAI. We have included a copy of the submitted letter for your records.

Sincerely,



Steve Ganesh, MCIP, RPP
Commissioner
Planning, Building & Growth Management

Attachment 1 – Letter to Minister Lecce from Mayor Brown RE: Northwest GTA Transmission Corridor Proposed Narrowed Area of Interest



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MAYOR PATRICK BROWN

Honorable Stephen Lecce
Minister of Energy and Mines
Legislative Assembly of Ontario
Via email: MinisterEnergy@ontario.ca

October 30, 2025

Dear Minister Lecce,

We appreciate your willingness to work with City staff on reviewing the proposed location of the Narrowed Area of Interest (NAI) for the Northwest GTA Transmission Corridor in the Heritage Heights Secondary Plan (HHSP) area.

City staff have undertaken a preliminary review of the proposed NAI and have identified significant land use, transportation, and environmental concerns. Most of the proposed NAI across the entire corridor is co-located with Highway 413, except for the area west of Highway 413 in the Heritage Heights Secondary Plan area, which deviates from the existing NAI.

This proposed deviation from the existing NAI comes as a surprise to the City and there are major impacts within the HHSP area, especially as it conflicts with the City's Ontario Land Tribunal (OLT) approved HHSP. The deviation will create inefficient land use patterns, disrupt planned street networks, and adversely impact the natural environment.

The provincial government has previously indicated that the alignment of the transmission corridor and Highway 413 would be co-located to minimize impacts to local municipalities. With the proposed NAI, the City will have to undo years of progress, ultimately delaying the implementation of the HHSP, hampering our ability to meet housing pledge targets, expedite job creation – all of which align with your government's objectives.

The City has been working collaboratively with landowners in the HHSP to streamline the development approvals process and reduce average development approval timelines, with the intent to cut-red tape and build more homes and create jobs for Brampton.

We are looking for the proposed NAI to be co-located with Highway 413, within the existing NAI, to avoid fragmenting Heritage Heights.

City staff will continue to engage with Ministry staff and submit formal comments to the ERO posting.



MAYOR PATRICK BROWN

However, I would like to emphasize Brampton's need for an NAI alignment that minimizes land use conflicts, ensures implementation of the Heritage Heights Secondary Plan, and supports the City's vision for compact, complete, and sustainable communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Brown".

Mayor Patrick Brown, City of Brampton

2. SUBMISSION OF CREDIT VALLEY CONSERVATION

Callee Robinson
Ministry of Energy and Mines
77 Grenville Street
Toronto, ON
M7A 2C1

Oct 21, 2025

RE: Credit Valley Conservation's Comments on ERO Posting 025-1133 – Refining a protected corridor of land for future electricity transmission infrastructure in the Northwest Greater Toronto Area

BACKGROUND

The Ministry of Energy and Mines (MEM) is refining the study area for the Northwest GTA Transmission Corridor Identification Study. This will be the final major revision to the study area, which is intended to be preserved long term until transmission infrastructure is constructed.

Credit Valley Conservation (CVC) is one of 36 Conservation Authorities (CAs) in Ontario. We support a strong provincial economy, safe housing and critical infrastructure development, and protecting municipal drinking water sources. Consistent with our mandate, we are committed to protecting people and property from the risks associated with natural hazards and wetland loss, while supporting sustainable economic development and the creation of safe, prosperous communities.

CREDIT VALLEY CONSERVATION COMMENTS

Lands Containing Hazardous Land

Figures 1 and 2 highlight areas within CVC's jurisdiction where the proposed *Narrowed Area of Interest (NAI)* for the transmission corridor extends beyond the existing alignment into areas containing hazardous land. This new alignment affects wetlands — including Provincially Significant Wetlands (PSWs) — and watercourse corridors that were previously avoided or less fragmented.

Unintentionally, the proposed NAI may further:

- Increase the loss of wetlands;
- Further fragment watercourse corridors;
- Elevate risks to people and property from natural hazards; and
- Result in higher costs for mitigation and risk management measures.

Impacts to CVC's Regulatory Role and Involvement in Local Planning Approvals

Within the Heritage Heights master-planned community in Northwest Brampton (see Figure 1), the proposed NAI extending outside of the current NAI boundaries is expected to affect previously approved or well-advanced regulatory and land use planning work significantly.

This includes the following studies and applications:

- Heritage Heights Subwatershed Study
- Heritage Heights Secondary Plan
- Privately initiated Planning Act applications
- Functional Servicing Studies
- Geomorphic Assessments
- Wetland Hydrology and Water Balance Assessments
- Water Resource Hydraulic Analyses

- Environmental Impact Studies

The result of the proposed deviation from the current corridor boundaries in this area would cause a loss of progress in reviews, commenting and approvals made to date – resulting in delay in process, duplication of effort, and unexpected use of limited resources.

CVC's RECOMMENDATIONS FOR CONSIDERATION

CVC recommends that MEM revise the October 2025 proposed NAI within CVC's jurisdiction to stay within the boundaries of the May 2025 NAI boundaries (see Figure 1 and 2), avoiding, to the greatest extent practicable, impacts to wetlands and lands containing natural hazards.

Thank you for the opportunity to review and provide comments on the ERO posting no. 025-1133. I would be pleased to discuss these comments further at your convenience.

Regards,

A handwritten signature in black ink, appearing to read 'Josh Campbell', followed by two dots as a period.

Josh Campbell MES, RPP
Director, Watershed Management and Development Services
Credit Valley Conservation

FIGURE 1. Brampton - Heritage Heights Community

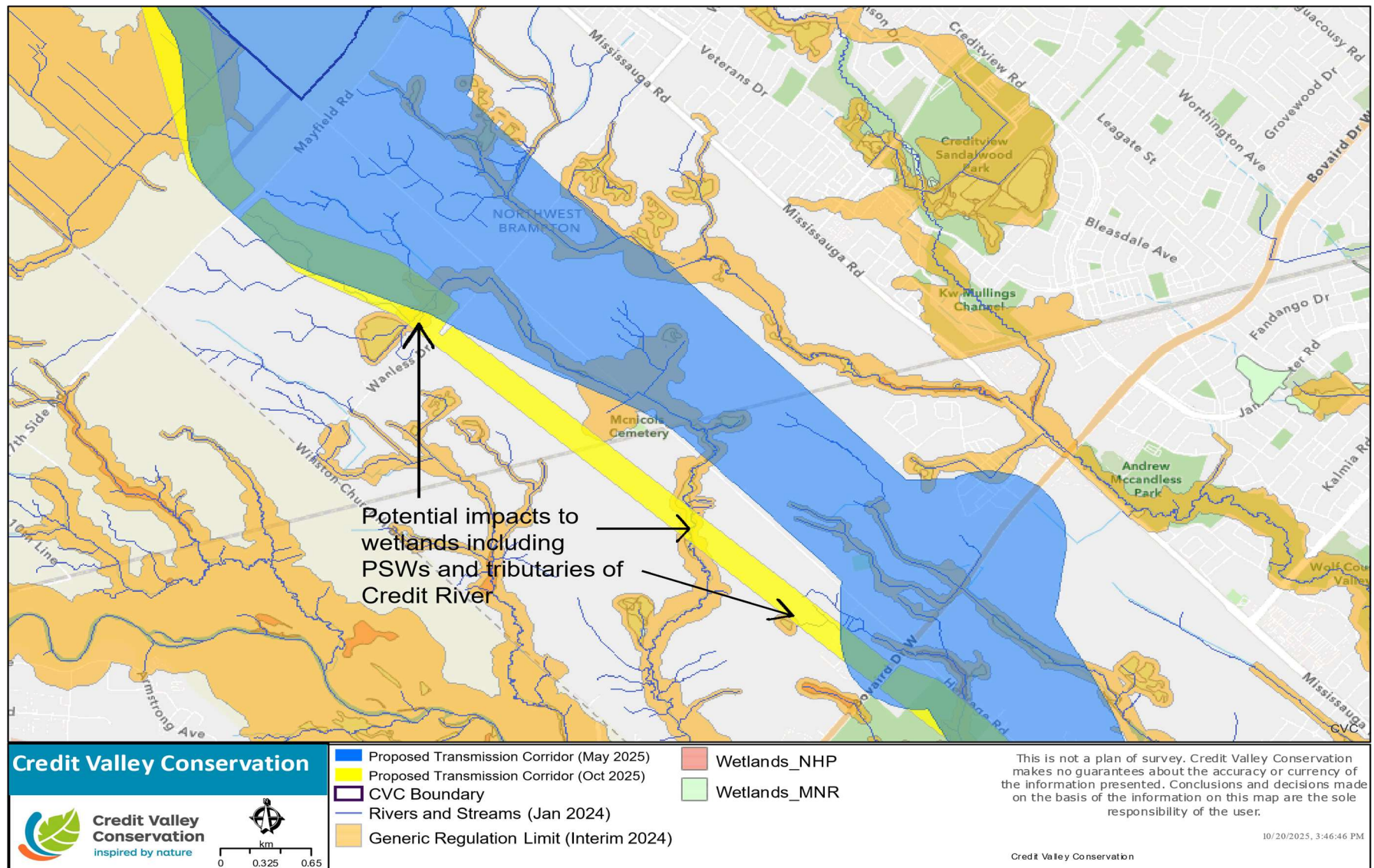
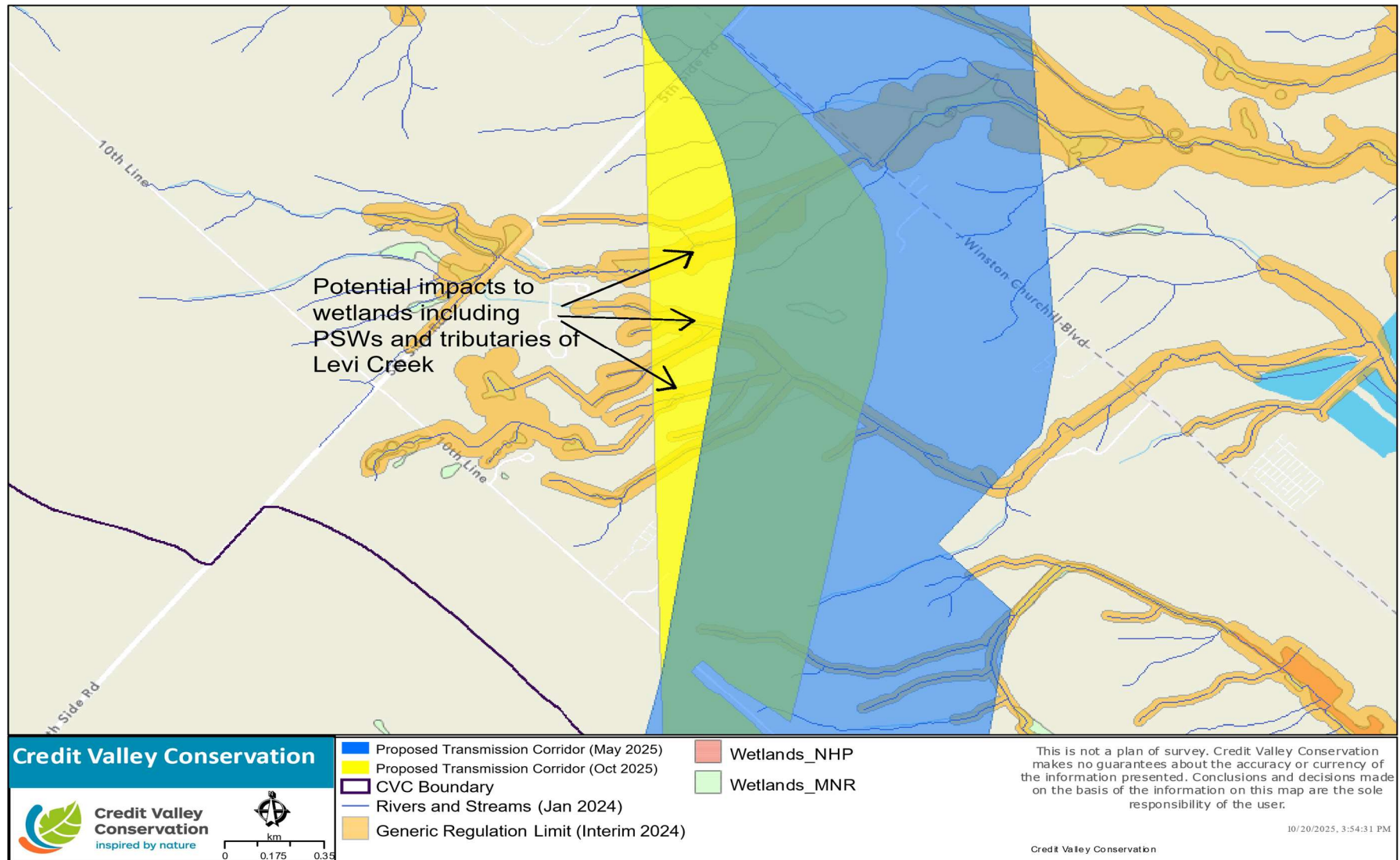


FIGURE 2. Halton Hills Impact Area



3. SUBMISSION OF THE HONOURABLE PETER VAN LOAN

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

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.

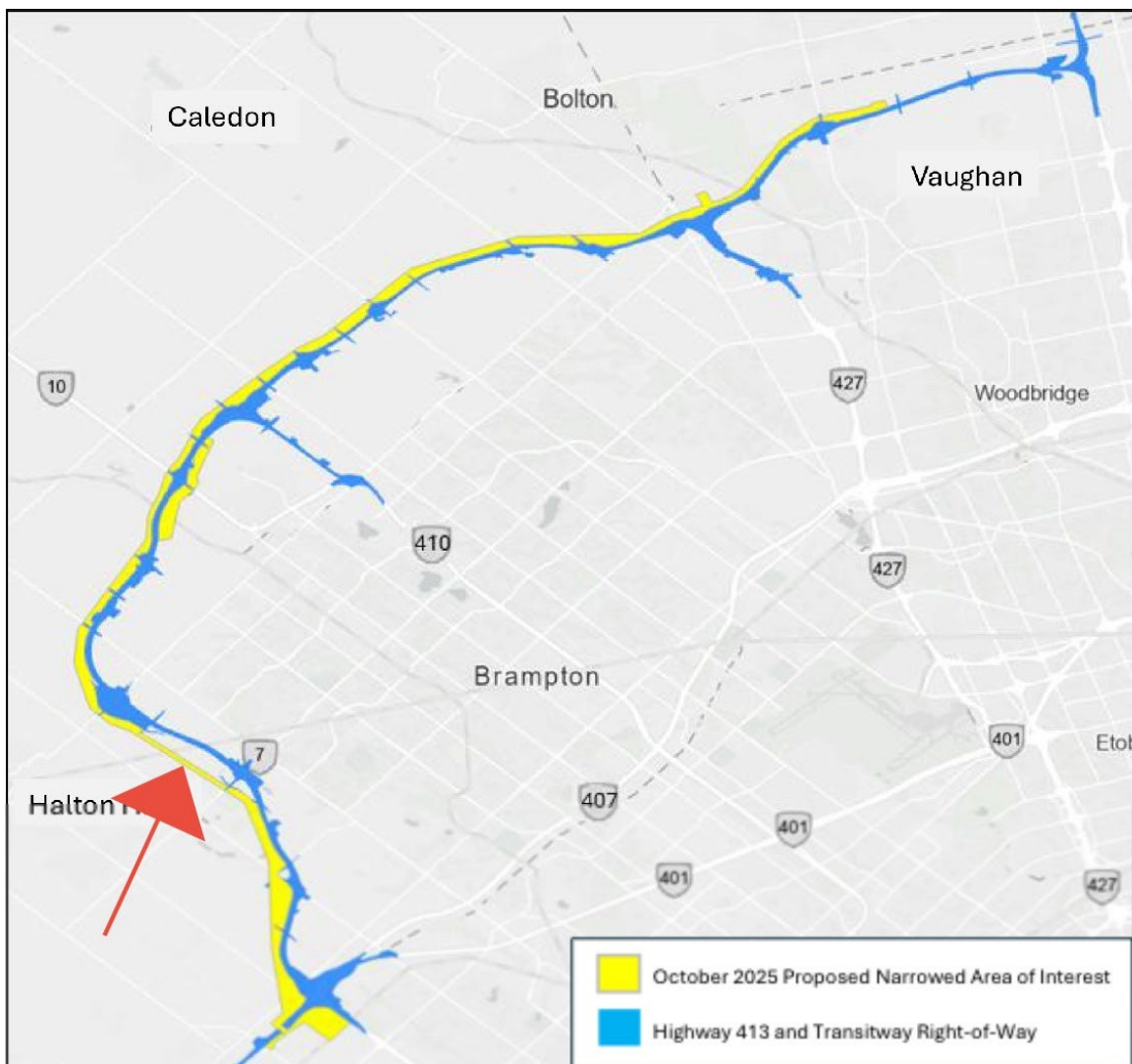
The dramatic and sudden change in the proposed route, without any notice, will have significant negative impacts on the years of community planning that has been undertaken - including approval of a Secondary Plan through a lengthy Ontario Land Tribunal Process, which culminated in August 2024. The Province 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.

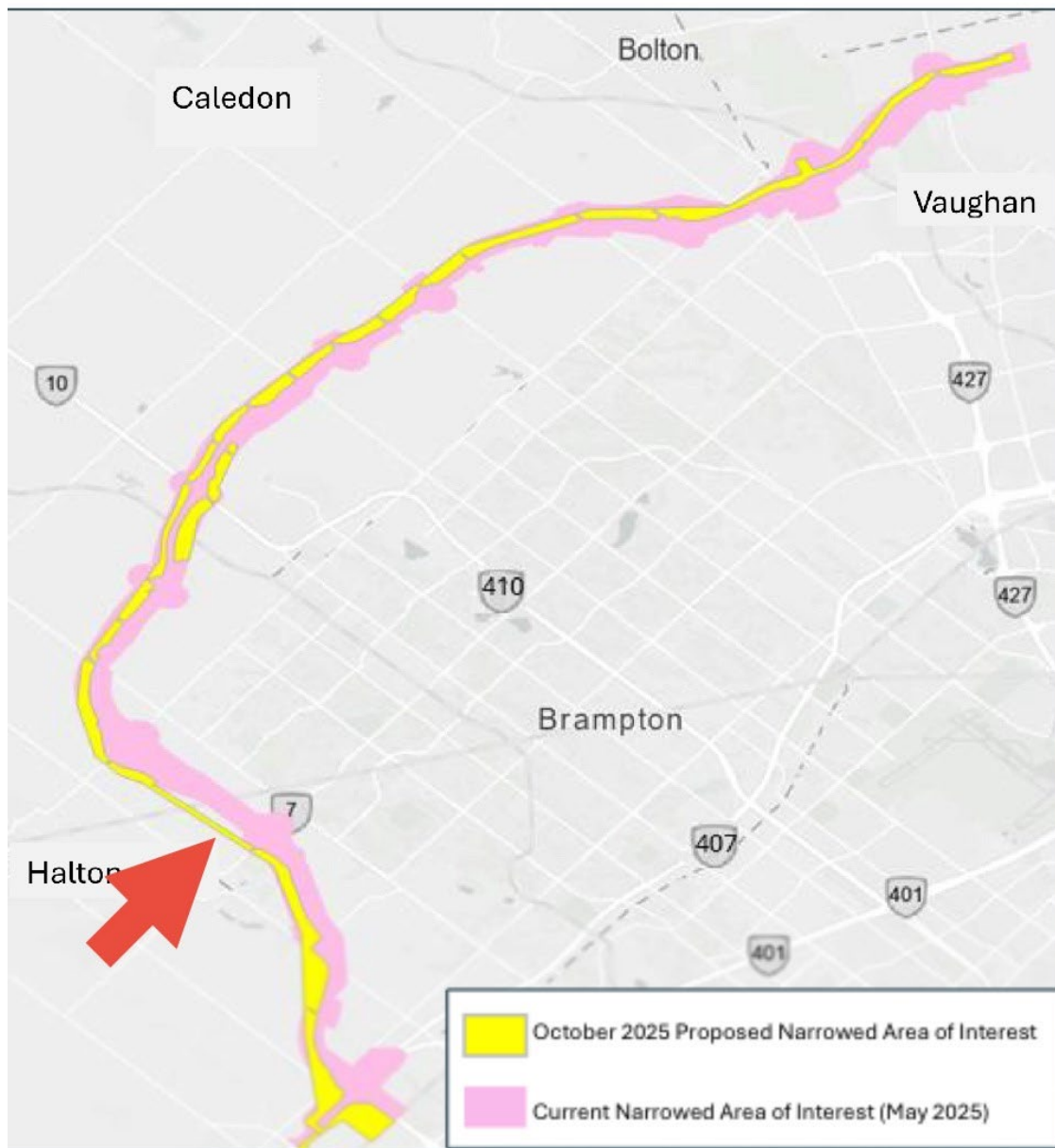
The Proposed Narrowed Area of Interest for the Hydro Corridor Diverts Away from the Highway 413 ONLY in Heritage Heights in Brampton - No Explanation for This Has Been Provided in Any Published Materials

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.”

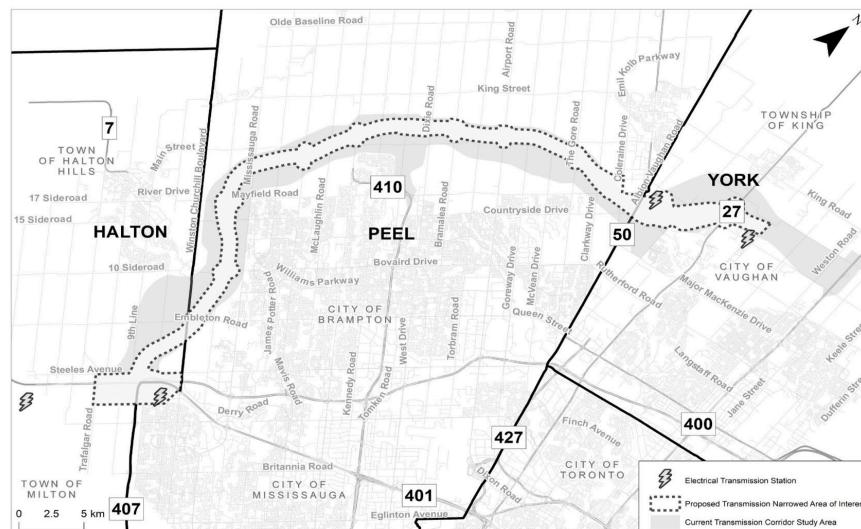
February 15, 2018 - IESO News Release Northwest - Greater Toronto Area Joint Corridor Identification Study Announced

“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”

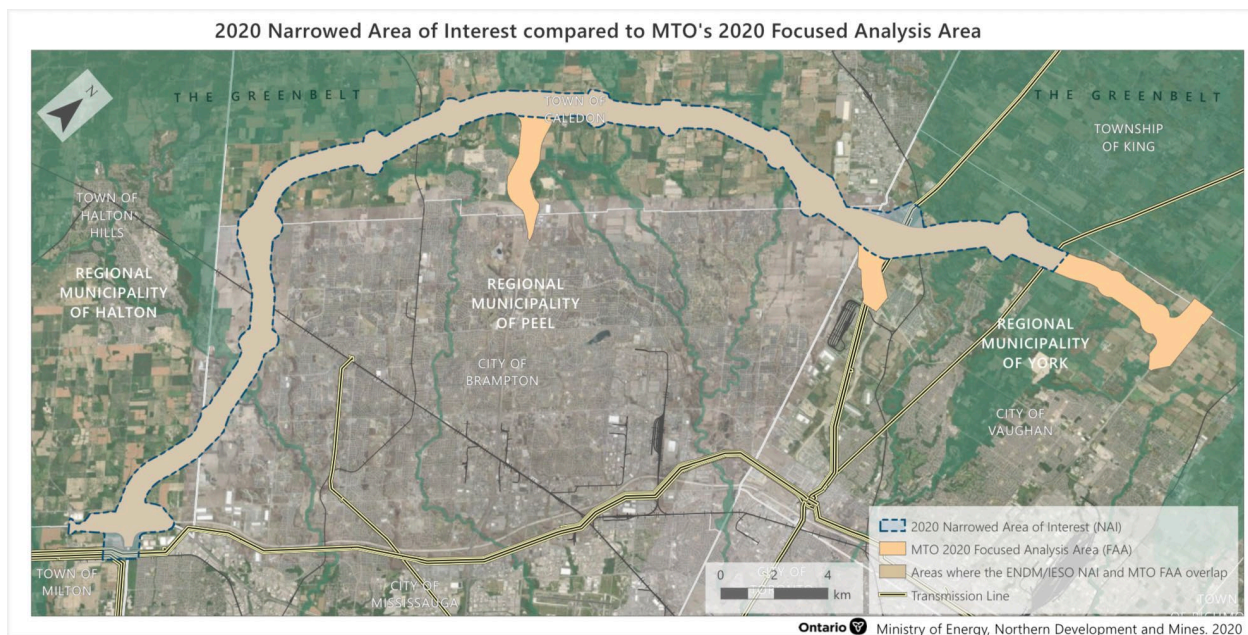
- “1. Co-locate with other linear infrastructure
- Corridor routing should maximize the use of existing linear infrastructure corridors wherever feasible (e.g. GTA (Greater Toronto Area) West Transportation Corridor, 200 series highways, other infrastructure corridors).”

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

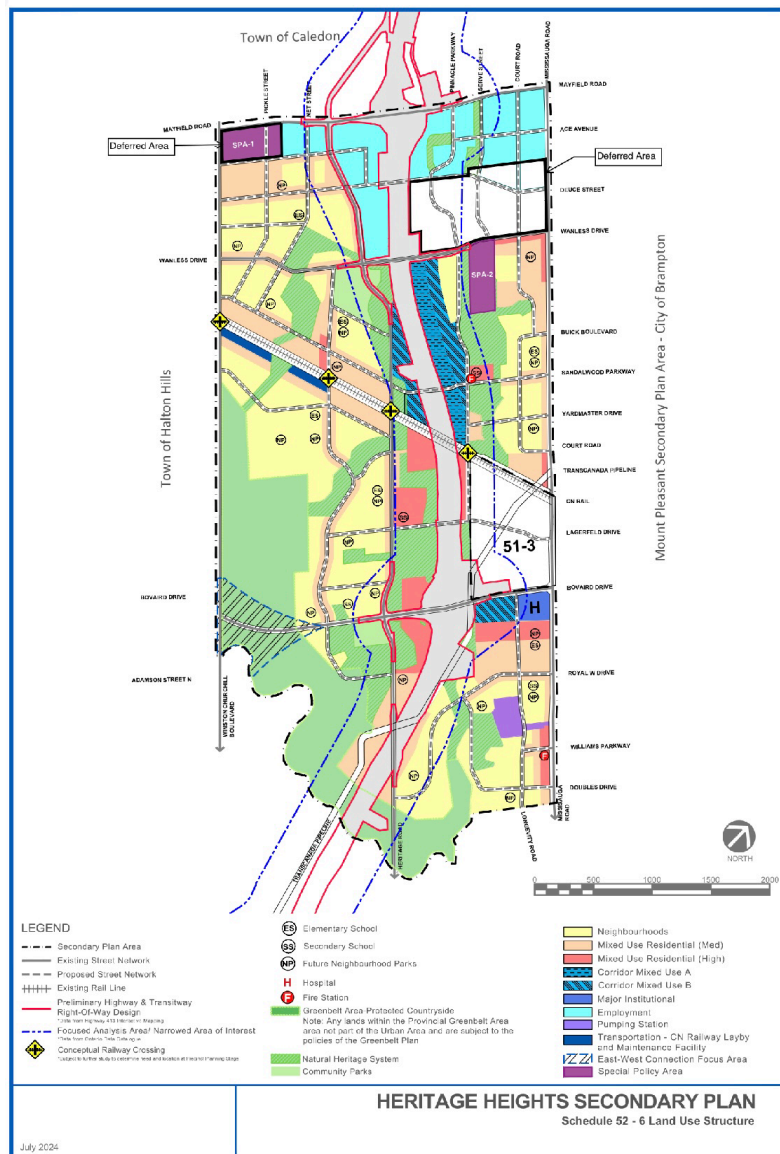
10.5.1 Lands within the Focused Analysis Area and Narrowed Area of Interest as shown on Schedule 52-6 will continue to be protected by the City of Brampton's Interim Control By-law 306-2003, until the Province of Ontario has released those areas.

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:

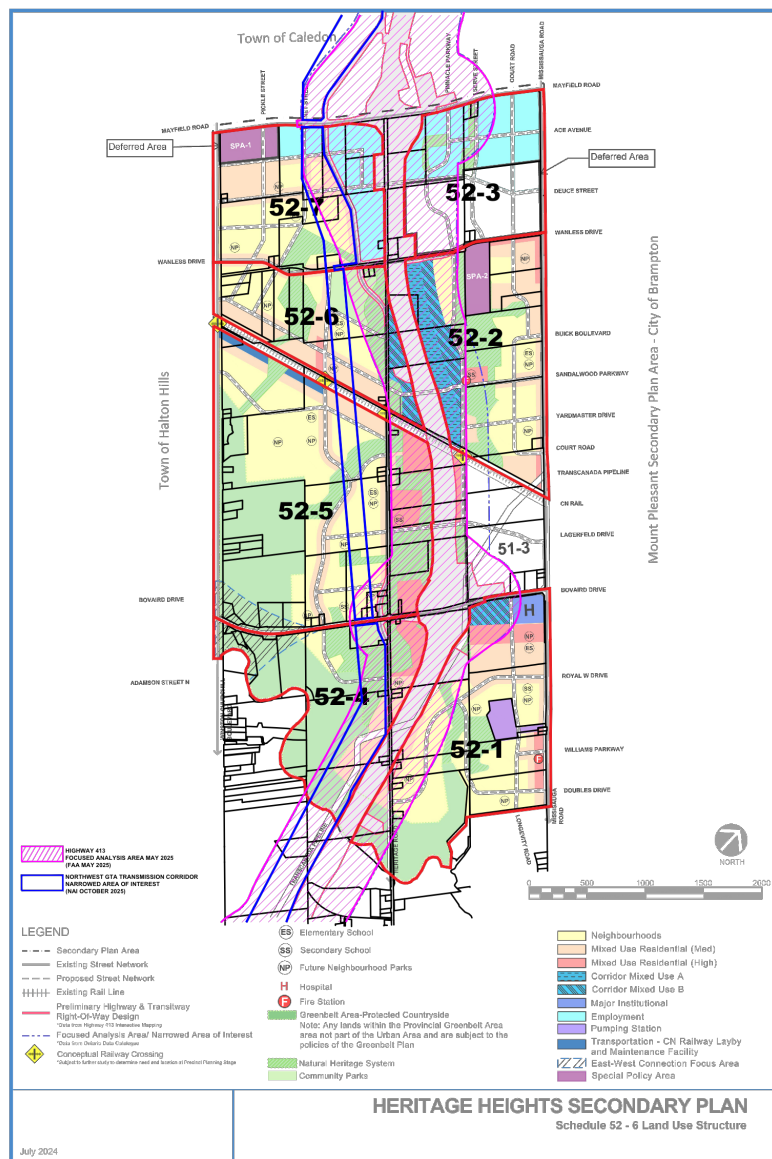
- The lands were brought into the urban area in 2006.
- Secondary planning commenced in 2009 and involved exhaustive public and agency consultation.
- Throughout, the landowners have actively participated in every aspect of the planning for the community.
- There have been several proposed land use plans 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 New Proposed Narrow Area of Interest Upends the Entire Planning of the Heritage Heights Secondary Plan Community, With Substantial Negative Impacts

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.

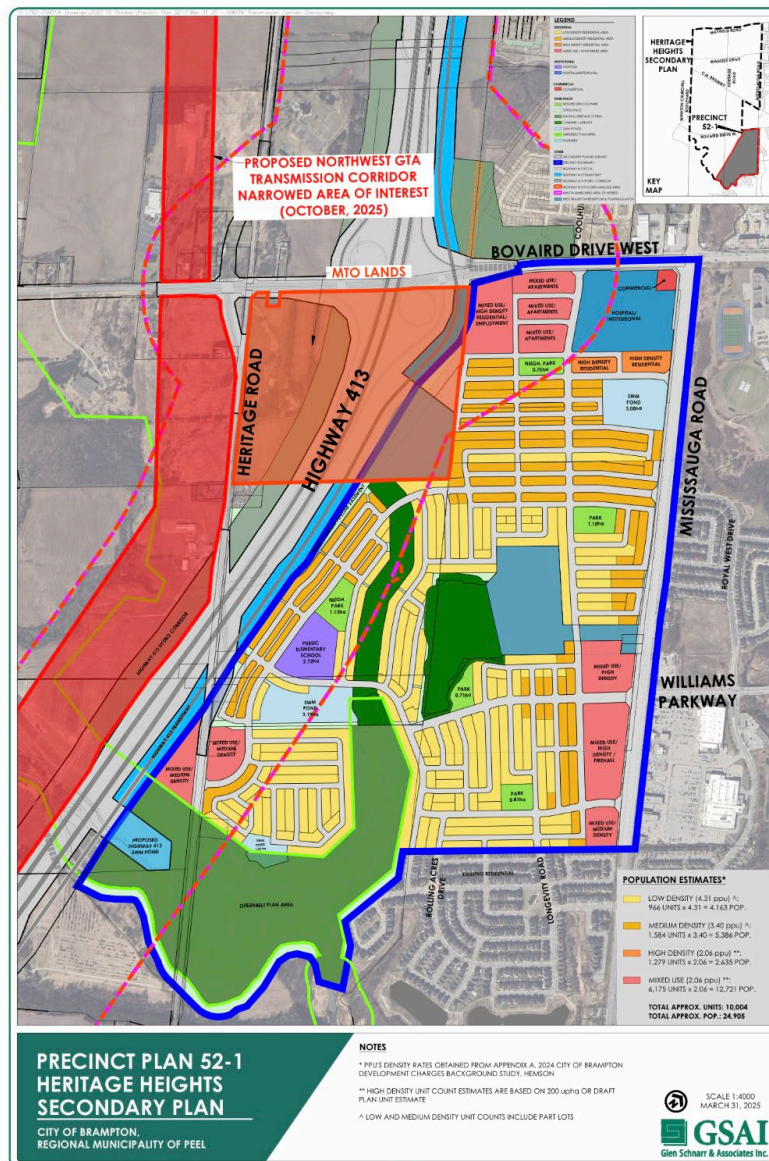
New Proposed Hydro Corridor Route Will Likely Result in Significantly Higher Land Acquisition Costs

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.

October 27, 2025

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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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4. SUBMISSION OF BRUCE AND SHIRLEY REED

October 30, 2025

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

Via mail: ministerenergy@ontario.ca

Re: ERO Number 025-1133

Refining a Protected Corridor of Land for Future Electricity

Transmission Infrastructure in the Northwest Greater Toronto Area

Dear Minister Lecce;

We are making our submission to express serious concerns with the proposed refinements to the Narrowed Area of Interest (“NAI”) within the City of Brampton (“City”), specifically the Heritage Heights Community. We are founding members, and active participants, in the Heritage Heights Landowners Group, dating back to the early 2000’s. We have been landowners in North West Brampton for the past 52 years, and were completely blindsided by the proposed refinements to the NAI, when the announcement dropped on Thanksgiving Friday.

Planning for the Heritage Heights community has been extensive, exhaustive, and expensive; spanning over two decades now. In August of 2024, Member Dixon approved the Heritage Heights Secondary Plan (“HHSP”) at the Ontario Land Tribunal, after 8 grueling months of mediation. The Province of Ontario was a Party to that hearing, but declined to actively participate in the hearing itself, as they were satisfied by the protection of the co-located highway corridor and transmission corridor within the HHSP itself. Since then, both the City and Landowners have actively pursued development applications within Heritage Heights to bring much needed housing to market. That process has been relentless. Many component studies to support the HHSP have been completed, or are close to completion. A number of the Precinct Plan Areas have submitted development applications in at the City, public meetings have occurred, and now all that is in jeopardy.

With respect to Northwest Greater Toronto Area GTA Transmission Corridor Identification Study (the “study”), for six years, the study did not include lands west of Heritage Road, after the 2020 Narrowed Area of Interest was reduced down to reflect the Focused Analysis Area (“FAA”) of the Highway 413 EA process. The change in routing now is unfair to the City, unfair to the Landowners, and unfair to the process at large. It appears Heritage Heights is the only area where co-location of the hydro corridor and Highway 413 is no longer proposed. One can easily

conclude that this will cause the most detrimental impacts across the entire 52km stretch of this corridor, due to the mature planning nature of the impacted areas. The consequence of the new proposed refinements to the NAI will upend years of planning, and will require that process to be substantially paused, revisited, and reassessed. The proposed changes does exactly the opposite of Provincial Policy, and what this Government is intending to accomplish by reducing red-tape and bring much needed housing and jobs to the market faster.

With respect the ERO posting itself, we would like to highlight a few key inaccuracies. The proposal details include the following:

Preserving this land corridor now will:

- *Avoid delays to project in-service dates to meet the pace of growth;*
- *Maximize co-location with Highway 413 to minimize land impacts, consistent with provincial policy under the Provincial Policy Statement;*
- *Avoid the need to build transmission infrastructure underground, which costs significantly more;*
- *Minimizes environmental impacts; and*
- *Provide certainty to municipal planners, landowners and developers.*

The decision to adopt the proposed refinements to the NAI, within Heritage Heights, will accomplish the complete opposite; the fifth bullet in particular. The decision to proceed with the proposed refinements to the NAI will cause complete chaos to a well-advanced planning process, in which all parties understood was advancing under the notion of co-located infrastructure corridors.

Another statement in the ERO posting, in which we believe, is false and misleading:

“Throughout the process, MEM engaged with stakeholders to gather feedback on the corridor’s design and its guiding principles. Input from these engagements has helped shape this proposal.”

If the above statement was true, would the City of Brampton and Landowners Group have reacted the way they did? No. Both the City and Landowners have been working collaboratively for over two decades. MEM and IESO did not engage stakeholders within the City of Brampton on the proposed refinements to the NAI. Up until October 10, 2025, we were all proceeding with the understanding of a co-located infrastructure corridor. The proposed refinements fly in the face of many things – Provincial Policy, the Study’s first guiding principle of co-location, a mature planning process in North West Brampton (that dates back almost two decades) and an approved Secondary Plan in which the Province was party to. This proposal contradicts years of statements and information provided by the Ministry of Energy and the IESO.

The Province and the IESO needs to return the NAI to be co-located with Highway 413, as it has

always been shown for years. We have been part of the process since day one, and were never contacted or consulted. Introducing another infrastructure corridor, separate from Highway 413, throws a dagger through our community, now and for the future planned community of Heritage Heights.

Yours truly,



Bruce Reed



Shirley Reed

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5. SUBMISSION OF HYDRO ONE NETWORKS INC.

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South Tower – Executive 8th Floor
Toronto, Ontario M5G 2P5
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June 8, 2020

Ms. Kirby Dier
Network and Microgrid Policy
Ministry of Energy, Northern Development and Mines
77 Grenville Street, 6th Floor
Toronto, ON M7A 2C1

Dear Ms. Dier:

RE: ERO 019-1503 (Proposal to Identify and Protect a Corridor of Land for Future Electricity Infrastructure in the Greater Toronto Area)

Thank you for the opportunity to provide comments on ERO Posting 019-1503, Proposal to Identify and Protect a Corridor of Land for Future Electricity Infrastructure in the Greater Toronto Area.

Hydro One Networks Inc. ("Hydro One") is Ontario's largest electricity transmission provider, serving almost the entire Province. In 2019, Hydro One invested more than \$1 billion in its transmission network, providing a safe and reliable system, which is essential to supporting a strong and successful Ontario.

Since 2014, Hydro One has been closely working with the Independent Electricity System Operator (IESO), formerly the Ontario Power Authority, to develop a comprehensive plan to support the future electricity infrastructure requirements of the Northwest Greater Toronto Area (GTA). Investing in future electricity transmission infrastructure in the Northwest GTA will be vital in supporting continued economic growth in the Halton, Peel and York regions.

Question 1: Are you aware of potential barriers or issues that may be associated with the proposed narrowed area of interest?

The 2015 Northwest GTA Integrated Regional Resource Plan (IRRP) contemplated that new transmission infrastructure would be required to meet the forecast electricity needs for Brampton, Caledon, Halton Hills and Vaughan. Appendix F of the IRRP further specified that, "A minimum of two new double circuit 230 kV transmission lines will be required within the

general vicinity of the Study Area's load growth centres and the technical details related to these facilities, including required corridor width, are to be provided by the transmitter."

In 2015, Hydro One examined the option of a 60 meter wide Northwest GTA corridor between the Milton Switching Station in Halton Region and the existing 230kV transmission corridor near the Kirby Road/Kipling Avenue in York Region (Circuits B82V/B83V). However, the connection points for the Northwest GTA corridor are not depicted in the proposed narrowed area of interest by the IESO and the Ministry of Energy, Northern Development and Mines (ENDM).

Hydro One recommends that the study confirm the connection points for the proposed transmission corridor. It is also suggested that the proposed narrowed study area map capture the existing transmission corridors, such as the 500kV/230kV corridor that the new transmission corridor will cross and the 230kV corridor (Circuits B82V/B83V) that is presumed to be the termination junction.

Given the objective for minimizing impacts to natural heritage, agriculture, and hydrological features, as well as impacts on built-up areas, Hydro One encourages that the IESO and ENDM's study also consider alternate corridor routes alongside the study area of the GTA West Transportation Corridor. It is therefore recommended that the proposed narrowed area of interest capture at least 60 meters on either side of the Ministry of Transportation's (MTO) study area for the GTA West Transportation Corridor.

Consideration should also be given to minimize and/or avoid unnecessary highway crossing by future transmission lines as such turns result in the need for more expensive, heavier equipment.

In addition, with consideration to increased growth in the northern portion of the GTA and emerging long term plans that are being contemplated for the transmission corridor travelling parallel with the 407 highway, provisioning for sufficient space, approximately 150m, would be required to accommodate further 500kV circuits.

Question 2: Are there other principles we should consider in conducting the study?

Hydro One supports the proposed guiding principles for corridor identification as these are largely reflective of the guiding principles outlined in Hydro One's draft Terms of Reference (2015), as part of its Environmental Assessment, for the Northwest GTA corridor.

We echo the importance of: strategic co-location of transmission infrastructure with other linear infrastructure corridors; planning for the most cost-effective option; minimizing impacts to agricultural lands, natural heritage and hydrologic features; minimizing impacts on existing municipal plans including built-up areas and planned developments; and, providing flexibility to respond to the future needs of this growing region.

We encourage that the study principles also seek out opportunities for positive impacts on the environment (e.g. natural, socio-economic and cultural). Community consultation, engagement

and education are integral part of the planning process for new transmission infrastructure. We recommend that the guiding principles also capture the importance of community engagement as this will be vital to the success of the future project.

Hydro One is pleased to see continued progress related to this project. Planning for transmission infrastructure in the Northwest GTA is important to supporting the forecasted growth in the area, and positioning it for economic recovery. We are committed to continuing to support both the IESO and MENDM with this study.

Please do not hesitate to contact me if you have any questions or would like to discuss our submission in greater detail.

Sincerely,

A handwritten signature in blue ink, appearing to read 'BJ', with a stylized flourish extending from the bottom right.

Bruno Jesus
Vice President, Planning and Engineering