



November 6, 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
Heritage Heights Secondary Plan Area, City of Brampton, Region of Peel**

We are writing on behalf of Primont Homes (Heritage Heights 4) Inc. and Pulcher Holdings Ltd. (Primont Homes), the owner of approximately 93 acres of land located within the boundaries of Winston Churchill Boulevard to the west, the CN Railway corridor to the south, the Highway 413 Transportation Corridor to the east, and Wanless Drive to the north, in the City of Brampton ("City"). These lands are also within the approved Heritage Heights Secondary Plan ("HHSP").

We are writing to express our concerns with the changes proposed to the Narrowed Area of Interest ("NAI") for the Northwest GTA Transmission Corridor ("Corridor") and the resulting impacts on the Heritage Heights community. We are active members of the Northwest Brampton Landowners Group Inc. ("NWBLG") and the Heritage Heights Landowners Group ("HHLOG") and support the NWBLG submissions.

On October 10, 2025, the Ministry of Energy and Mines ("Ministry"), with the Independent Electricity Operator ("IESO"), released a refined study area for the Northwest GTA Transmission Corridor Identification Study. The refinement included a significant revision to the NAI on the west side of the proposed Highway 413 corridor within the HHSP (the "revised NAI"). Approximately 4 km of the NAI is no longer co-located alongside the Highway 413 corridor and instead creates a gap of land with a separate piece of linear infrastructure splitting the HHSP for



the first time west of Heritage Road. The HHSP planning implications will undoubtedly extend beyond the revised NAI. This release was a surprising and sudden departure from any previously published NAI. We are not aware of any consultation prior to this revision.

We are very concerned with the potential impacts of the revised NAI on the Heritage Heights community. As part of Precinct 52-6 in the HHSP, reports and technical studies are underway and the proposed shift of the transmission corridor would substantially impact the planned land use structure, and substantially reduce the number of homes that can be delivered. The proposed new alignment would destroy a significant portion of the approved Secondary Plan (i.e., Precinct 52-6) and would go against the Premier's mandate to build new homes quickly. We anticipate that our applications will support over 2,300 units, including the delivery of a school block, a community park, and other community uses but the realignment would effectively require us to start our process from the beginning. Two decades worth of planning would be instantly erased.

The revised NAI will result in:

- Costly delays to the HHSP approved on August 21, 2024 by the Ontario Land Tribunal after nearly 20 years of planning since the lands were brought into the urban area;
- Fragmenting of the land use structure that does not optimize development through co-location of the NAI and Highway 413 or build more homes faster;
- Potential revisiting of completed, or nearly completed, technical studies;
- Uncertainty for in-progress Precinct Plans and development applications;
- Failure to protect and mitigate impacts to the natural environment;
- Failure to meet Provincial Policy and co-location principles; and
- Wasteful expenditures of public funds with additional costs of compensating two separate linear infrastructures and greater community impacts.

We are requesting that the revised NAI be returned to the prior version with the co-location of the NAI alongside the proposed Highway 413 in the HHSP area. For nearly 10 years, the Transmission Corridor has been co-located alongside Highway 413. For context, the Province was



privy to the mediated Secondary Plan settlement before the Ontario Land Tribunal in 2024 but declined to take an active role as they were satisfied that the Secondary Plan continued to respect the long understood co-located infrastructure corridor.

If the Ministry is unwilling to proceed directly to co-location, we support the request of the NWBLG to create a Task Force to examine the Corridor challenges in the context of planning for the HHSP to find an acceptable solution as detailed in the NWBLG submissions. We agree that lands outside of the HHSP could be released at the outset. If a Task Force is required, we also agree it should immediately determine what lands within the HHSP can be released from the NAI to ensure critical development lands within the HHSP can proceed to approval in a timely manner.

After 20 years of planning for the HHSP, we as landowners want to continue moving forward to build desperately needed homes and a complete community for the City. We are confident a solution can be achieved that still provides for the necessary Corridor without the revised NAI.

We respectfully request that the Ministry pause any further action respecting the Transmission Corridor until consultation can be held to understand the detrimental effects the proposed new alignment will undoubtedly have on delivering much needed housing in a timely manner.

Yours truly,

Carmela Liggio

Carmela Liggio
Director, Land Development
Primont Homes

cc: Mayor Patrick Brown and Members of Brampton City Council
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