



November 4, 2025

**By E-mail Only to *ministerenergy@ontario.ca***

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

**Re: ERO Number: 025-1133  
Proposed Refinement of the Northwest GTA Transmission Corridor  
Heritage Heights Secondary Plan Area  
City of Brampton (the “City”), Region of Peel (the “Region”)**

Dear Minister Lecce:

We write on behalf of Bramwest Development Corp., the owner of approximately 225 acres of land known municipally as 10510 Heritage Road (the “**Lands**”) in the City. The Lands are also within the approved Heritage Heights Secondary Plan (the “**Secondary Plan**”).

We write to convey our significant concerns and frustration with the proposed refinement (the “**Refinement**”) of the Northwest GTA Transmission Corridor (the “**Transmission Corridor**”) released by the Ministry of Energy and Mines (“**MEM**”) on October 10, 2025. The Refinement of the Transmission Corridor departs from the long understood linear infrastructure corridor that has been respected and protected for years. The Refinement of the Transmission Corridor will result in the:

- Obliteration of a significant portion of the approved Secondary Plan, resulting in a fragmented and incohesive land use structure.
- Failure to contribute to the Premier’s mandate to build new homes quickly.
- Wasteful expenditure of significant public funds to expropriate portions of the Lands together with corresponding astronomical injurious affection claims.

#### Our Request

Return to the long-understood co-location of the Transmission Corridor alongside Highway 413 for the full extent of the Secondary Plan area.

In the alternative, that the MEM pause any further action regarding the Transmission Corridor until meaningful consultation between the Province and stakeholders is held. Should the Province be willing to consult, we have no doubt that any technical or land

use compatibility issues will be resolved in a manner that will not undermine decades of planning efforts.

### Obliteration of the Secondary Plan

Landowner efforts to prepare the Secondary Plan began at least a decade before the Independent Electricity System Operator (IESO) released the Northwest GTA Integrated Regional Resource Plan in April 2015 (the “**Resource Plan**”).

The foundational principles in the Resource Plan advocated for the coordination of infrastructure planning, ensuring efficiency, minimizing land use conflicts, and reducing cumulative environmental and social impacts. In February 2018, the IESO and the Ministry of Transportation (the “**MTO**”) jointly announced the Joint Corridor Identification Study, the objective of which was to protect a shared corridor for both transportation and electricity transmission purposes. Landowners within the Secondary Plan area were supportive of these objectives and continued to do what they do best: plan for housing.

In the nearly 10 years that followed these announcements, planning for the Secondary Plan respected the objective of co-locating the Transmission Corridor alongside Highway 413.

Regrettably, based on the mapping shared by MEM on October 10, 2025, which departs from the long respected co-located linear infrastructure corridor, it appears that no consideration was given to the negative impact the Refinement would have on the approved Secondary Plan. For context, the Province was privy to the mediated Secondary Plan settlement before the Ontario Land Tribunal (the “**OLT**”) 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.

### Failure to Meet the Premier's Mandate to Build New Homes Quickly

Resulting directly from the MEM and IESO action to seemingly disregard the approved Secondary Plan, new homes will not be built quickly within the Heritage Heights area of the City.

It took decades of effort by the landowners and the City alike to prepare the required technical studies, reports and analysis to bring the Secondary Plan to a mediated OLT settlement. The Secondary Plan was expected to result in approximately 45,000 new residential units in the Heritage Heights area of the City. With supporting infrastructure under construction and post-Secondary Plan applications having already been filed with the City, new units within Heritage Heights were expected to bring immediate housing relief to the region.

The stark reality is that the Refinement's obliteration of the approved Secondary Plan will require a complete re-design of significant swaths of the Heritage Heights area. The direct result of which will be a significant delay in delivering much needed housing in Ontario. The City anticipates a delay of at least six months, we expect it to be in the order of years.

#### Wasteful Expenditure of Public Funds

The Refinement of the Transmission Corridor results in two separated linear infrastructure corridors. This configuration immediately doubles the magnitude of incompatibility and adverse effects on adjacent lands.

If co-location was pursued as it had been until at least October 10, 2025, the Transmission Corridor would have acted as a mitigating buffer to Highway 413, the latter of which reasonably represents the more impactful land use. Instead, the introduction of two separated linear infrastructure corridors will result in the significant expenditure of public funds to address the astronomical injurious affection claims that will follow the expropriation of affected lands.

This is an obvious waste of public funds that has been created, without consultation, as a result of the unilateral Refinement to the Transmission Corridor.

#### Consultation May Result in Amicable Solutions

It bears repeating that the Refinement to the Transmission Corridor departs from the long understood co-located linear infrastructure corridor that has been respected and protected for years. This Refinement was arrived at without consultation of any kind.

Leaving aside the failure to consult with affected stakeholders, we remain committed to meeting with Ministry staff to understand what has led to this departure in an effort to resolve all technical and/or land use issues. For example, countless studies, reports and analyses were completed by experts in their respective fields in support of the approved Secondary Plan. Surely this information could be of use to the MEM, IESO and MTO to avoid the incompatibility issues we now face.

If the MEM, IESO or MTO has land acquisition needs, we may be able to help. After all, the Secondary Plan encompasses approximately 3,500 hectares of land.

Consultation could result in a fresh set of eyes looking at issues from a different perspective, or discipline, not previously considered by the Ministries. This type of collaborative exchange should be welcomed. Importantly, landowners within the Secondary Plan area have already begun exploring solutions to resolve or alleviate technical issues that necessitated the Refinement, which could also greatly minimize costs and avoid the destruction of the planning process thus far.

## Conclusion

We respectfully request that the MEM pause any further action respecting the Transmission Corridor until consultation can be held with an eye to resolving the serious and detrimental effects the Refinement will undoubtedly have on delivering much needed housing in a timely manner while preserving the public purse.

Kind regards,



Andy Margaritis  
Vice President, Land Development  
State Building Group

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