

November 9, 2025

**MinisterEnergy@ontario.ca**

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

Dear Minister Lecce:

**Re: ERO Number 025-1133**

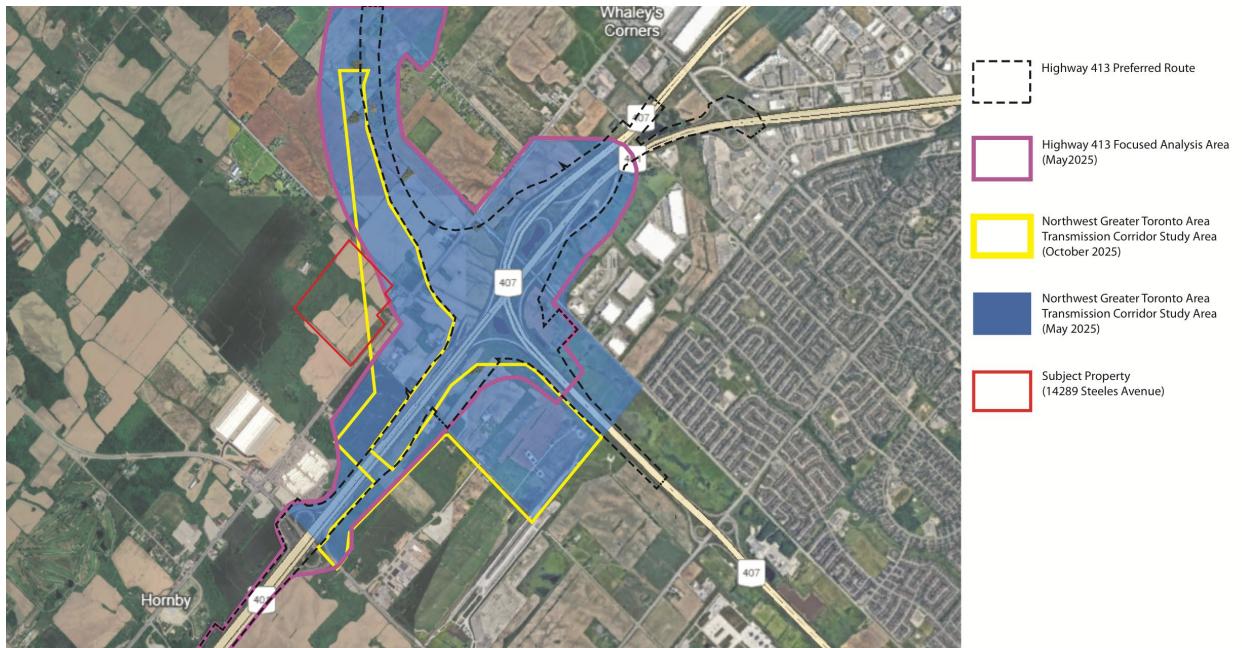
**Refining a Protected Corridor of Land for Future Electricity Transmission  
Infrastructure in the Northwest Greater Toronto Area Impact on First Gulf Halton  
Steeles Limited and Sun Life Assurance Company of Canada - 14289 Steeles, Halton  
Hills**

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We are writing to express concern with a sudden change in the proposed Narrowed Area of Interest (“NAI”) for the Northwest GTA Transmission Corridor, which was released on October 10, 2025. We act for First Gulf Halton Steeles Limited and Sun Life Assurance Company of Canada with respect to their property located at 14289 Steeles Avenue (the “First Gulf” site). After six years during which only a very small sliver of the site was identified as within the Narrowed Area of Interest, the proposed hydro corridor is now dramatically expanded onto our client’s lands, creating significant negative impacts that is detrimental to the active rezoning application on the First Gulf site. The new proposed hydro corridor will make planned development of the site, for important large scale employment users, virtually impossible and we are of the opinion that the hydro corridor should be restricted to the lands owned and under negotiation by the Province.

The previous more than six years of study have not included most of this land as part of the identified Narrowed Area of Interest for the purposes of study and consultation. As such, the new expanded proposed route is a surprise to First Gulf. No direct notice has been provided to date from the Province of this change to First Gulf, despite the considerable adverse impact it will have on them, and despite our letter dated December 23, 2024 that demonstrated our concern in the matter.

The plan below shows the previous hydro corridor (May 2025) in blue, and the new proposed hydro corridor in this area outlined in yellow. The First Gulf site is outlined in red.



The proposed new route contradicts over six years of published mapping and consultation from the Ministry of Energy and the Independent Electricity System Operator that have indicated minimal overlap with the hydro corridor and the First Gulf lands.

The dramatic and sudden expansion 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 the Premium Gateway Employment Area Phase 2B Secondary Plan (Halton Hills Official Plan Amendment 50) through a lengthy planning and Ontario Land Tribunal Process, which culminated in May 2025.

The Provincial interest in the corridor was protected by the municipality through designation of the Narrowed Area of Interest as part of a "Highway 413 Corridor Protection Area". This covered only a very small sliver of the corner of the First Gulf site. The Province did not take an active role in that hearing, presumably satisfied with the extent of the land designated as Highway 413 Corridor Protection Area, which was coincident with the proposed hydro corridor study area.

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

It appears, especially based upon past study, that the new proposed hydro corridor over protects more land than required. The consequence of which is that large tracts of valuable land, attractive to potential large-scale employment users, is effectively frozen indefinitely from development.

The Province and the IESO should return to an approach where the hydro corridor is identified only on the lands that are absolutely required, and on a route taking advantage of lands already acquired by the province for corridor purposes.

**Move to Include A Significant Portion of the First Gulf Site in the Hydro Corridor Will Severely Limit the Ability to Achieve A Premium Employment Use on this Site**

The First Gulf property is a prime location for a potential high profile employment user. Its location at the intersection of three 400 series highways, close proximity to regional servicing infrastructure, and a large, growing labour pool make it an attractive site for employment users.

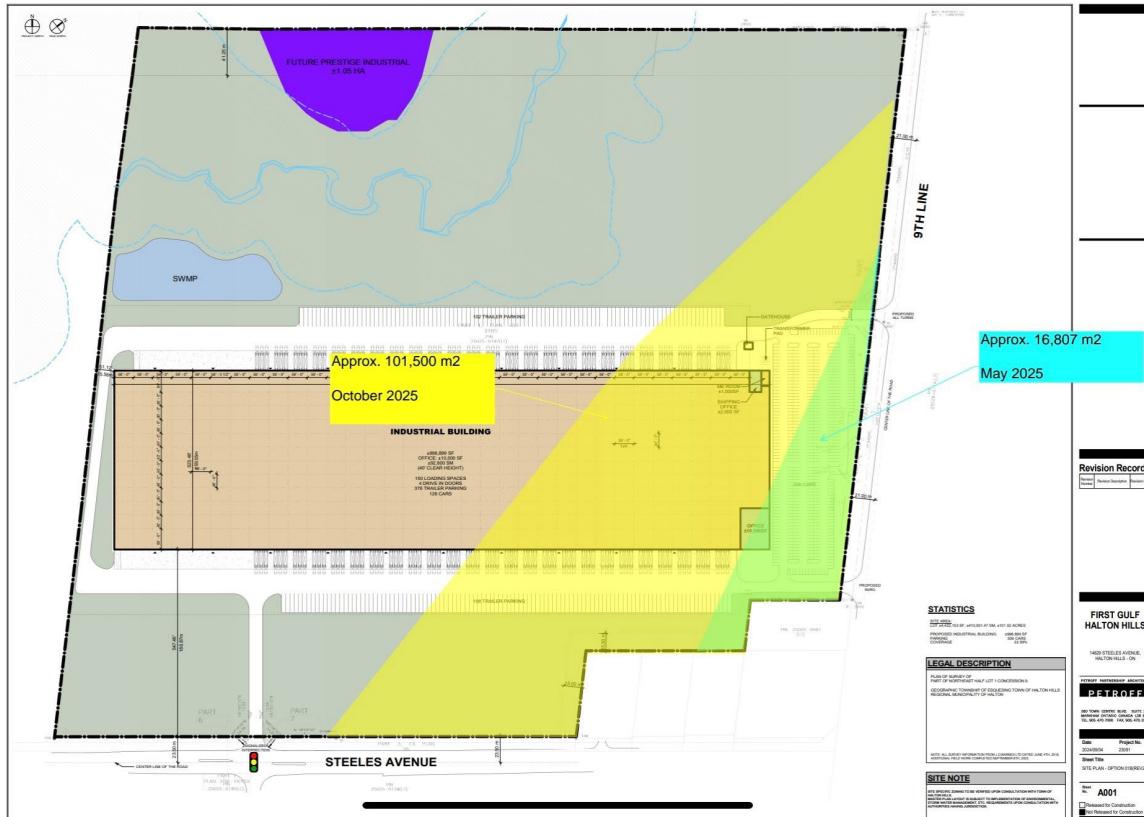
For these reasons, it is important that in planning the hydro corridor alignment care is taken when determining the amount of land taken for the corridor is kept to the amount required, and no more. Any excess of land being frozen by the corridor is not justified, especially at this key location.

Additionally, the size of the site presents a rare and unique opportunity for a large scale development of a building greater than 1 million square feet which attracts interest from large multi-national employers. The Province of Ontario has been facing challenges being able to find and offer such large sites to potential investors and this expanded NAI would effectively be eliminating this employment opportunity.

It is significant to note that over the last twelve months First Gulf has engaged in very serious discussions with three large international groups about locating their facility at the site demonstrating the sites ability to attract essential foreign investment to drive economic growth and create jobs in the Province of Ontario and Halton Hills.

However, the impact of the new proposed hydro corridor will sterilize such a large portion of the First Gulf site that it will no longer be possible to offer the site to such a prime user.

Below is a plan showing how such a large single user would be located on the site (as offered in previous discussions) - and also (in yellow) how the newly expanded hydro corridor would make such an investment, and the associated economic growth and jobs, an impossibility.



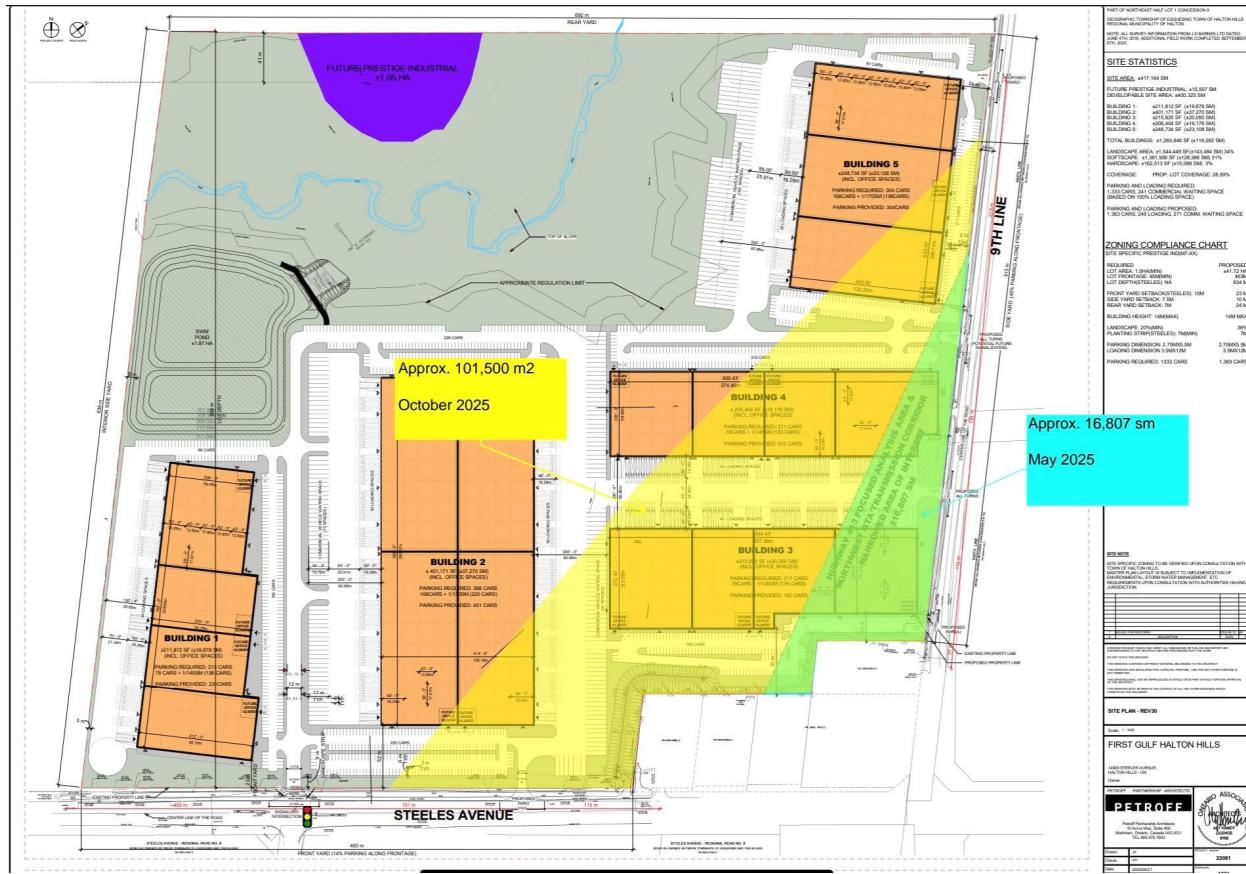
The green in the plan above shows the previously protected corridor - just shaving a portion from the south-east corner of the site. The yellow shows the significant expansion of the hydro corridor into the previously unstudied lands. It renders the proposed building as impossible.

First Gulf has also explored a multi-building option to market the site in addition to a single building scenario. The plan below was submitted as part of a zoning application to the Town of Halton Hills. It has five buildings proposed, together totaling over one million square feet.

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However, as the plan below demonstrates, the new expanded hydro corridor makes it impossible to construct four out of those five proposed buildings.



It is important to note that the plans shown above include 22 acres of protected land at the northwest portion of the site that restricts development given the natural heritage features related to Sixteen Mile Creek. In either case as presented above, the expanded NAI is 6 times the size of the current NAI and is detrimental to the active rezoning application at 14829 Steeles Avenue. As a result, should the expanded NAI be approved, not only would the First Gulf site be more difficult to develop, but the owner would also face severe challenges selling the land in the future given it would create remnant, unsuitable parcels of land.

Recent provincial legislative and policy changes clearly establish an intention to avoid unnecessary delays in planning approvals. If the proposed new expanded NAI is approved, it would conflict with the Province's direction to streamline and facilitate development approvals given it would require an additional process by both the Municipality and private landowners, including our Client.

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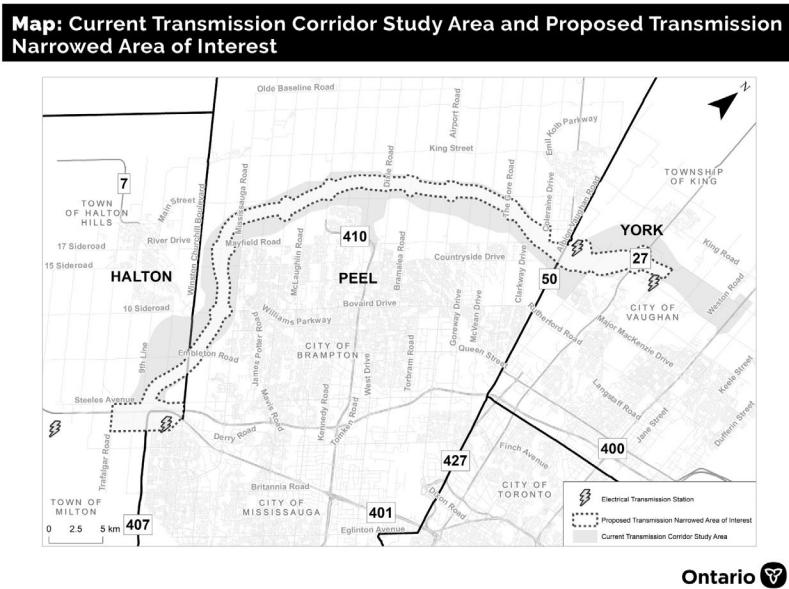
Serious consideration should be given to whether this expanded area is actually necessary. We strongly believe it is likely that the Independent Electricity System Operator is being excessively cautious in their approach to protecting lands for the hydro corridor, especially to the extent that the corridor is now being extended to lands that were previously released from the Narrowed Area of Interest as no longer necessary for the hydro corridor, a decision reinforced as recently as the corridor changes announced in May 2025.

**The Process is Now Severely Flawed. For Over Six Years, There Has Been No Suggestion or Study Regarding Locating the Hydro Corridor on Much of the First Gulf Lands**

The process is now deeply flawed. For more than six years, there has been no suggestion that all but a narrow sliver of the First Gulf site was a possible hydro corridor route location.

**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 narrowed area of interest are shown below.”



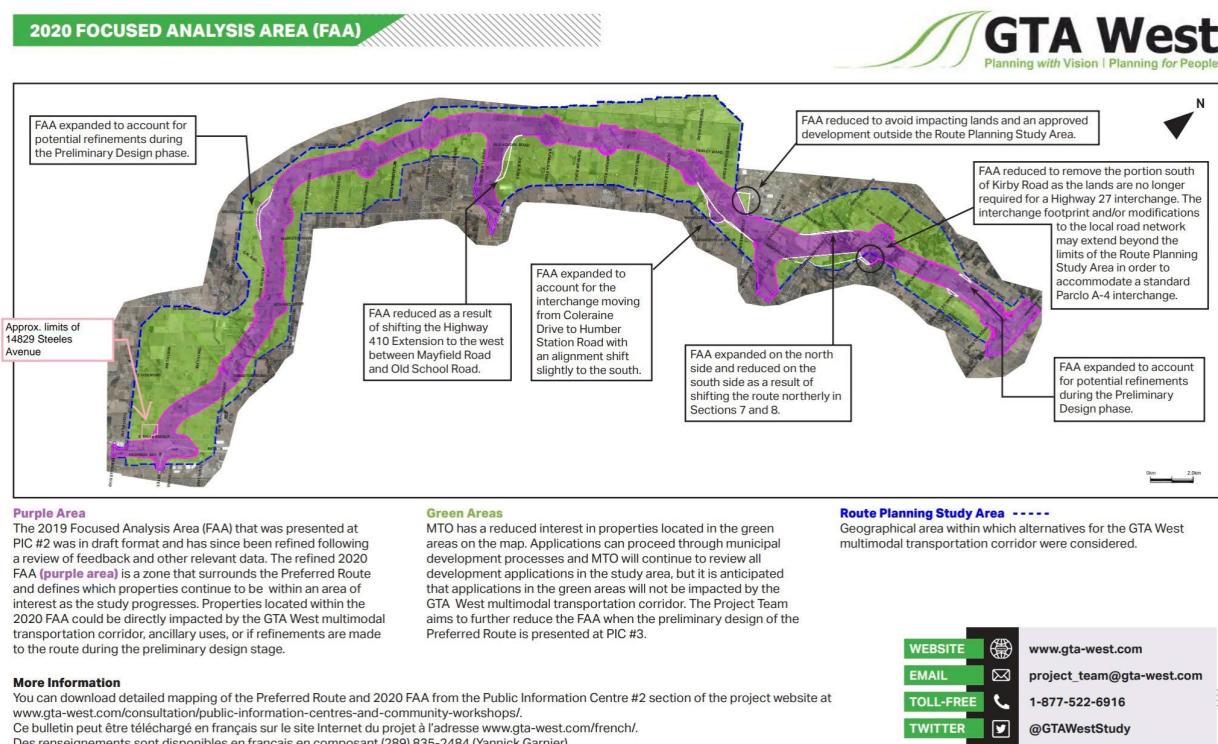
This revised mapping clearly excludes most of the First Gulf site from the hydro corridor study area. (The First Gulf Site is north of Steeles Avenue, and west of 9th Line both roads are clearly shown on the map.)

**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**

“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.”

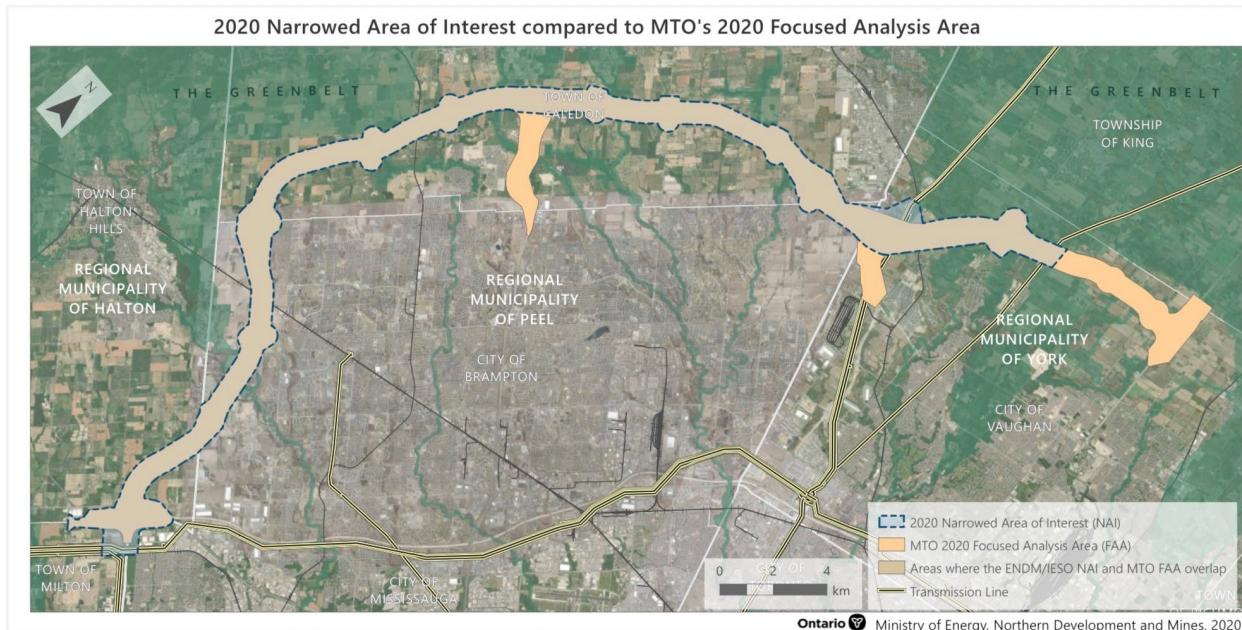
The majority of the First Gulf site was not included in the study area (the First Gulf Site at 14829 Steeles has been overlaid on this map).



**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.”

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



No changes were made affecting the First Gulf site. However, a small portion of land was added to the Narrowed Area of Interest for the hydro corridor south of the Highway 401. This block of land was added, presumably, to facilitate the connection of any proposed Northwest GTA Transmission Corridor to the existing transmission corridor running parallel to the 401 on its south side.

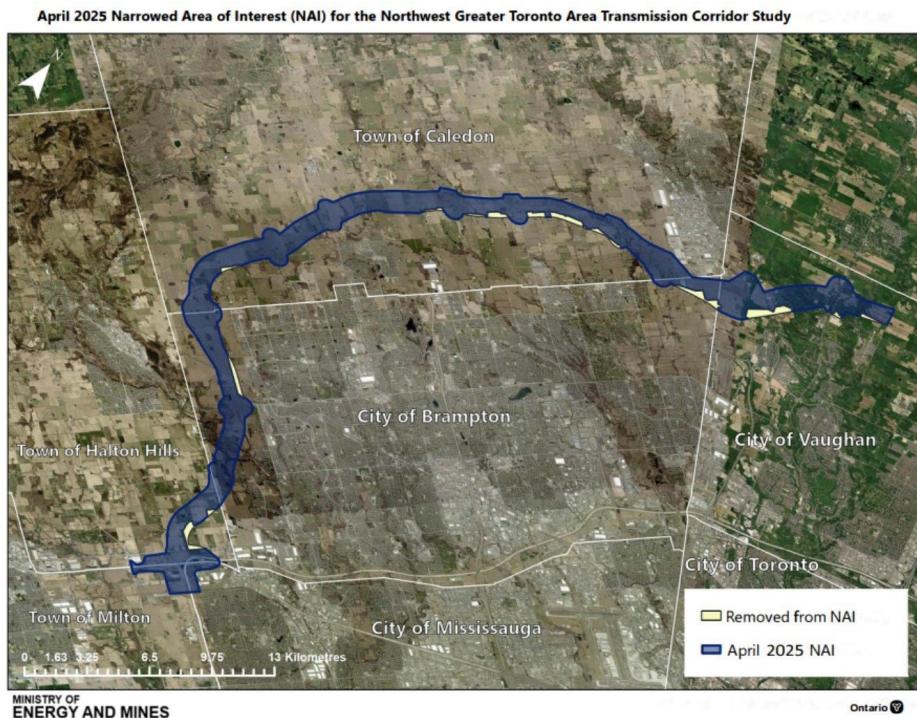
**December 9, 2024** - Environmental Registry Posting - Ministry of Transportation - Highway 413 Focused Analysis Area and Northwest GTA Transmission Corridor Narrowed Area of Interest Refinements

“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.” The proposed hydro corridor remained unchanged insofar as it affects the First Gulf site.



### **The Proposed Narrowed Area of Interest for the Hydro Corridor Is Now Proposed to Include First Gulf Lands Previously Excluded From Study**

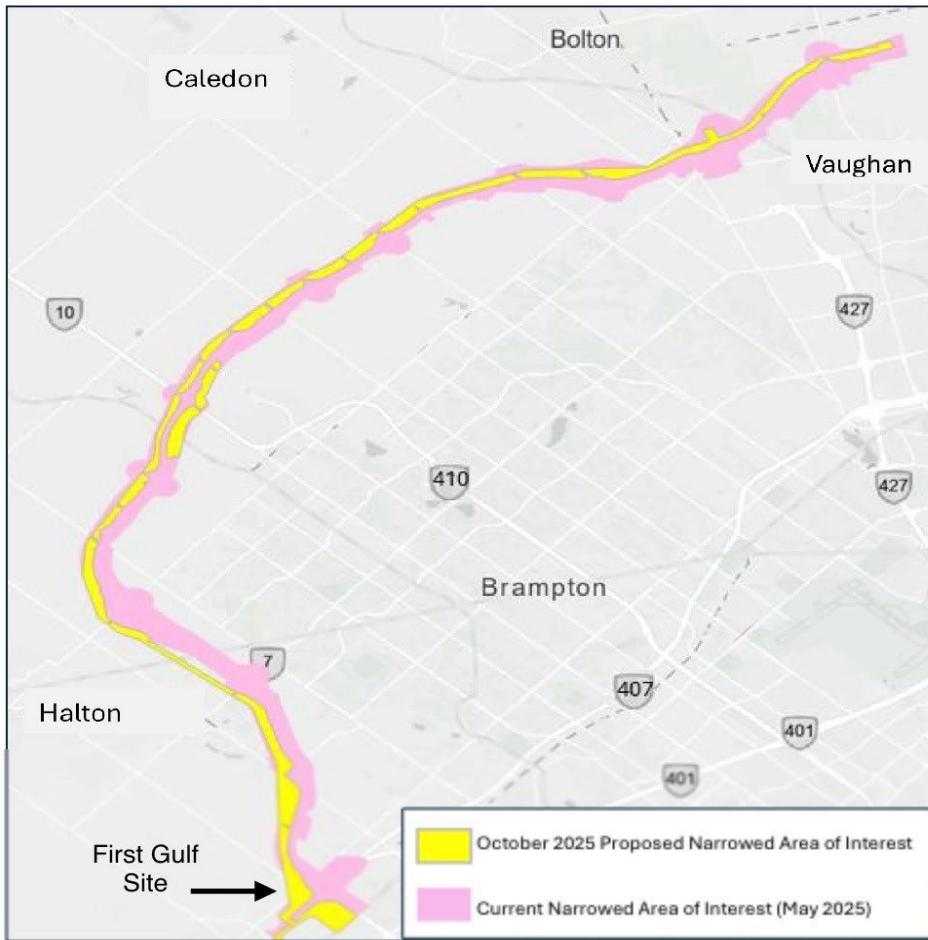
After more than six years of a process in which the hydro corridor was always proposed, and shown, to be adjacent the Highway 413 corridor, and hardly touched First Gulf Halton lands, the October 10, 2025 announcement suggests a new expanded route, on previously unstudied First Gulf lands. The area in question is identified by the black arrow in the map below.

**October 2025 Proposed Narrowed Area of Interest (NAI) for the  
Northwest Greater Toronto Area Transmission Corridor Study  
Compared to the Highway 413 Project**



The image that follows shows how most of the new proposed Narrowed Area of Interest on the First Gulf lands is outside of the previously published Narrowed Area of Interest - demonstrating that most of this land was previously unstudied.

### October 2025 Proposed Narrowed Area of Interest (NAI) for the Northwest Greater Toronto Area Transmission Corridor Study



#### The Width and Impact of the New Proposed Hydro Corridor On the First Gulf Lands Is Not Consistent With Provincial Policy Requirements

The new proposal to extend the Narrowed Area of Interest to much of the First Gulf Lands is not consistent with Provincial Policy requirements.

Provincial Planning Statement policy 3.3.5 indicates that *"The co-location of linear infrastructure should be promoted, where appropriate."*

Provincial policy then requires that planned corridors avoid, minimize or mitigate negative impacts on adjacent lands.

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.*

*Although the policy assumes that adjacent land uses are decided AFTER the planned corridor is established, 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, by opting to now significantly widen the corridor in this area, to extend to much of the First Gulf site, the negative impact and adverse effects of the corridor are expanded.

In fact, the effect of the newly expanded corridor is such as to adversely affect the ability of the First Gulf site to deliver on its previous economic development potential for major employment creating uses, at a strategic location where three different 400 series highways come together.

### **Halton Hills Official Plan Amendment 50 - Secondary Planning Protected for the Hydro Corridor Including At an Ontario Land Tribunal Hearing - Province Did Not Participate, Apparently Satisfied with Proposed Corridor Protection**

Through its Premium Gateway Employment Area Phase 2B Secondary Plan (Halton Hills Official Plan Amendment 50) the Town of Halton Hills protected lands identified for a potential hydro corridor. It did so through a “Highway 413 Corridor Protection Area” land use designation.

The policy is as follows:

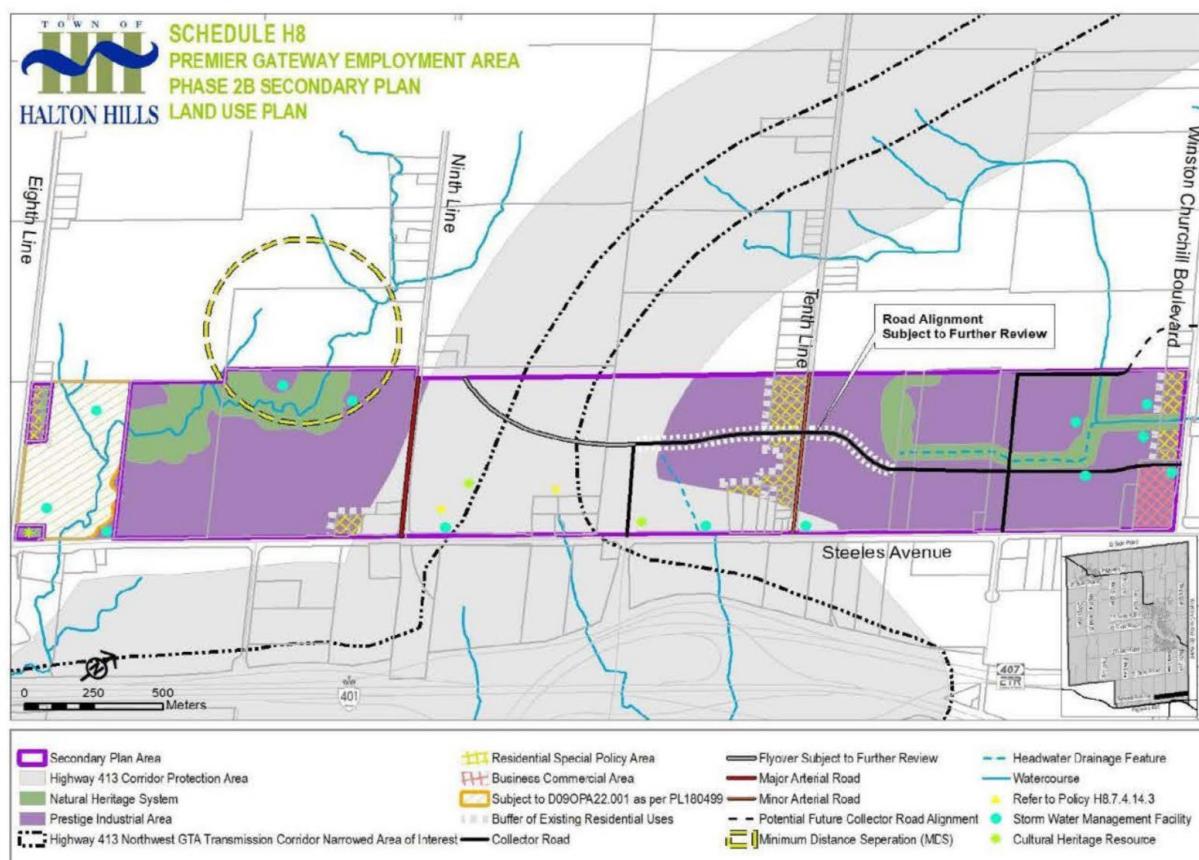
#### ***H8.9.1 Highway 413 and the Northwest GTA Transmission Corridor***

*H8.9.1.1 The Highway 413 Focused Analysis Area and the Northwest GTA Transmission Corridor Narrowed Area of Interest are to be protected as planned corridors for the purpose(s) for which they are identified.*

*H8.9.1.2 Development within the Highway 413 Focus Analysis Area and Northwest GTA Transmission Corridor Narrowed Area of Interest shown on Schedule H8 of this plan will not preclude or negatively affect the planning and/or implementation of the planned corridors for the purpose(s) for which they are identified.*

*H8.9.1.3 Lands shown on Schedule H8 as being within the Highway 413 Corridor Protection Area, have an underlying Prestige Industrial Area designation. When the final location of Highway 413 and Northwest GTA Transmission Corridor has been determined by the Province, all lands not required for Highway 413 or the Northwest GTA Transmission Corridor may develop in accordance with the Prestige Industrial Area designation and policies of this Plan without an amendment to this Secondary Plan.*

Schedule H8 delineating the protected corridor for the Focused Analysis Area and the Narrowed Area of Interest is in the grey colour below:



The protected corridor is a co-located highway FAA and hydro corridor Narrowed Area of Interest. Only a small portion touches the southeast corner of the First Gulf site - which is north of Steeles and west of Ninth Line (not including the small lots at the very corner of that block as shown on the map).

It is unfair to all the parties to the Ontario Land Tribunal Hearing, including the Town of Halton Hills, Halton Region, and First Gulf, for the Province to now suddenly expand the corridor into the approved secondary plan area. The above mapping in Schedule H8 to Official Plan Amendment 50, reflects the Provincial interest that was expressed.

The consequence of adoption of the new proposed Narrowed Area of Interest will be to disrupt, after the fact, this extensive planning process. The consequence will be to adversely affect the ability of the Town and the landowners to achieve a premium employment development on this prime location - causing an enormous adverse economic impact, and a loss of significant economic development potential to the Province, and loss of assessment to the municipality.

The Municipality will also find it is no longer able to satisfy its employment targets, as set out in Section H8.6.1 of the approved secondary plan.

### **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 that will result in a significant increase in land acquisition cost over the previously planned route more immediately adjacent to the highway. This is not in the interests of the taxpayers, or hydro ratepayers.

If the corridor is more adjacent in its co-location with the highway, much of the route here will be on a parcel of land that will be acquired for the highway. The parcel on the east side of Ninth Line, immediately to the east of the First Gulf site, will be required by the Province to accommodate the Highway 413 corridor. The land acquisition cost to establish the hydro corridor in this area is significantly mitigated if it is located on land that will be acquired by the Province, in any event, for the highway.

A related land cost consideration is the diminution of value to unacquired remnant part of the First Gulf Site. The site, as a smaller remnant, will not be able to fulfill the needs of a large sized user. This will give rise to an injurious affection claim that would not arise with the originally proposed corridor.

Such an avoidable escalation in land acquisition costs, including an increased injurious affection claim, 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.

### **No Reason Has Been Given for the New Expansion of the Corridor Onto Long Ago Released First Gulf Lands - A More Efficient Alignment Would Follow the Previously Identified Corridor, and Be Adjacent to the Highway**

There has been no explanation offered to First Gulf respecting the expanded NAI that is approved, would occupy First Gulf lands not originally subject to the NAI. In fact, the Independent Electricity System Operator has not even advised First Gulf of this sudden change to capture much of their land within the proposed corridor. This is despite First Gulf's previous submissions identifying concerns with the (then much more limited) Narrowed Area of Interest in a letter dated December 23, 2024.

We observe that a large box of land south of the 401, and west of the 407, had been previously protected for the hydro corridor. We presume that this was to allow a connection to other existing parts of the hydro grid - including the east-west transmission line south of the 401.

We note that, in February 2025, the Province acquired a parcel of land on the south side of Highway 401 within the block lands that were added to the Narrowed Area of Interest in 2020 - presumably to facilitate connection to the existing transmission line. A direct route north from that parcel will allow connection to the new hydro corridor therefore reducing the need to impact privately owned parcels including the First Gulf site. This would locate the hydro corridor entirely on lands either already provincially acquired, or to be acquired for the Highway 413.

Such an approach would have significantly less adverse impact on land use planning policies, on economic development potential, and on cost to the taxpayers.

### **The Proposed New Narrowed Area of Interest Should Be Abandoned and the Hydro Corridor Should Be Returned and Refined to a Location Adjacent to the Highway 413**

For reasons of fairness and the integrity of the facility siting process, the abrupt departure from the previous corridor onto the First Gulf site should be reversed.

The plan for the hydro corridor to be located tightly beside the Highway 413, understood to be the approach for over six years, should be resumed.

Lands not previously impacted will be subject to additional studies should the expanded NAI be approved. This goes against the Provinces' mandate of streamlining development approvals in Ontario.

There are considerable negative impacts of the change from an economic development and land use perspective. The effect of the unanticipated expansion of the hydro corridor is contrary to provincial policy, which seeks to avoid, minimize or mitigate negative impacts.

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

There is considerable hardship that will be caused to First Gulf and to Halton Hills. It is unfair to change the route at this late stage, after years of good faith reliance upon the Province's long-stated identification of the corridor as not applying to the overwhelming majority of the First Gulf site.

The proposal to significantly and unnecessarily expand the hydro corridor on the First Gulf lands should be abandoned, and the hydro corridor should be restricted to the now already acquired lands, and lands under negotiation including east of Ninth Line.

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We ask that our client be informed of any future notices as it relates to both the FAA and NAI, and we ask that the Province consider our client in any future community engagement opportunities.

Yours truly,

AIRD & BERLIS LLP



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

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