

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 ATFP Brampton III Limited, ATFP Brampton IV Limited, ATFP Brampton V Limited and TFP Heritage Wanless Developments Limited the owners of approximately 311 acres of land within three precinct areas, forming part of the approved Heritage Heights Secondary Plan ("HHSP"), in the City of Brampton ("City").

These comments are intended to supersede comments 158528 and 158526 (that we provided shortly after the new information was made public about the NAI), and takes into account new information and analysis that we have received recently. These comments also align with the position of the City and Heritage Heights Landowner Group (of which we are an active member).

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 52-1, 52-2 and 52-4 in the HHSP, we have been completing and submitting technical studies and working with the City, Region and agencies towards approval of the Precinct Plan and site specific development Official Plan Amendments, Zoning and Draft Plan of Subdivision applications. We anticipate that our applications will support several hundred residential units on full build-out as well as at least 2,000 new jobs.

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. 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.

Yours truly,



Mitchell Taleski

Director, Land Development

cc: Mayor Patrick Brown and Members of Brampton City Council

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