

November 7, 2025

GSAI File: 713-005

Ministry of Energy and Mines (MEM)
77 Grenville Street, 6th Floor
Toronto, ON, M7A 2C1

Attention: Callee Robinson
Senior Policy Advisor

RE: ERO 025-1133 (*Refining a protector corridor of land for future electricity transmission infrastructure in the Northwest Greater Toronto Area*)
Block 40-5 Landowner's Group
Public Input Letter

Glen Schnarr and Associates Inc. (GSAI) is pleased to make this ERO comment submission on behalf of the Block 40-5 Landowners Group (Block 40-5 LOG). Our firm, along with another planning firm (Gagnon Walker Domes Ltd.), jointly represents various landowners within the Block 40-5 area. The Block 40-5 LOG owns approximately 112 hectares (278 acres) across multiple land holdings in Block 40-5 of the Bram West Secondary Plan Area (40a).

The Bram West Secondary Plan Area (40a) and Block 40-5 is outlined in **Attachment 1**. The Block 40-5 LOG Concept Plan is further detailed in **Attachment 2**. These lands are directly impacted by Highway 413 and the Northwest GTA Transmission Corridor Narrowed Area of Interest (NWGTA NAI), and the proposed October 2025 NWGTA NAI is overlaid in **Attachment 1** and **Attachment 2** for information.

Chronology of Key Events and Provincial Direction

The coordinated planning of transportation and transmission infrastructure in the northwest Greater Toronto Area (GTA) has long been guided by a consistent Provincial direction emphasizing integration and co-location. This approach has been reaffirmed through a series of studies, and Environmental Registry postings over the past decade.

In April 2015, the Independent Electricity System Operator (IESO) released the Northwest GTA Integrated Regional Resource Plan, which first recommended that a future transmission corridor be planned in proximity to the proposed GTA West Transportation Corridor. This early directive established the foundational principle of coordinated infrastructure planning, ensuring efficiency, minimizing land use conflicts, and reducing cumulative environmental and social impacts.

In February 2018, the Ministry of Transportation (MTO) and the IESO jointly announced the Joint Corridor Identification Study, a collaborative initiative intended to identify lands suitable for multipurpose linear infrastructure. The stated objective of this study was to protect a shared corridor

for both transportation and electricity transmission purposes, thereby reinforcing the Province's integrated planning framework.

In June 2019, the Province released the Narrowed Area of Interest (NAI), which closely mirrored MTO's Focused Analysis Area (FAA) for Highway 413. This alignment reflected the continued commitment to co-location and inter-ministerial coordination. Subsequently, in March 2020, the Ministry of Energy and Mines (MEM) posted an update to the Environmental Registry confirming that Provincial policy continued to support co-location of linear infrastructure and that the hydro corridor study would be coordinated with MTO's previous corridor analyses from 2015 and 2019.

The Province reaffirmed this policy direction in November 2020 through an Environmental Registry Decision Notice, citing strong stakeholder and public support for co-location along the Highway 413 alignment. This approach was recognized as the most effective means of minimizing impacts on natural heritage features, agricultural lands, and planned community areas. The IESO's GTA West Integrated Resource Plan, published in July 2021, further confirmed that the proposed transmission corridor was anticipated to align closely with MTO's highway study area.

This direction was reiterated during joint IESO–MTO public engagement sessions held in October and December 2024, where both agencies presented materials demonstrating that the hydro corridor study remained adjacent to Highway 413 and that the NAI and FAA boundaries were “almost identical.”

In May 2025, the Province issued another ERO Decision Notice reaffirming that ongoing refinements to the corridor were informed by updated technical studies and continued to be guided by the objective of co-location. As of mid-2025, co-location remained the underlying Provincial assumption and planning basis.

The long-standing alignment between the NAI and FAA boundaries clearly illustrates the Provincial intent that the transmission and highway corridors be planned in proximity, reinforcing the importance of keeping the two infrastructure projects co-located.

Comments

On behalf of the Block 40-5 LOG, we reviewed the Ministry of Energy and Mines (MEM) ERO posting (#025-1133) and note that the MEM's scoped study area impacts Block 40-5. As such, we provide the following comments and recommendations.

1. The Block 40-5 LOG has concerns with the proposed October 2025 refinements to the NWGTA NAI. In support of the vision for the future 40-5 community, **it is our professional planning opinion that the Transmission Corridor should be aligned immediately adjacent to the Highway 413 right-of-way, on the east side of the Trans-Canada Pipeline.** Further, **best efforts should be made to minimize the width of the future Transmission Corridor, where feasible, to preserve future homes and jobs within the City of Brampton.**
2. In reviewing the proposed October 2025 refinement, we note that the NWGTA NAI is still within the Highway 413 Focused Analysis Area (FAA) limits, which we are in agreement with. However, **we recommend that the MEM direct the future infrastructure to abut**

the Highway 413 and Transitway Right-of-Way (between the Trans-Canada Pipeline and the Highway 413 Right-of-Way). Locating the Transmission Corridor in this consolidated infrastructure corridor will establish a more efficient land use pattern, minimizing impacts on valuable developable lands while supporting the City's housing and employment objectives. This configuration will also facilitate a more coordinated approach to infrastructure delivery at a time when job creation and economic stability in Brampton are critical.

3. Over the past decade, the Block 40-5 LOG has been actively developing a Block Plan for the 40-5 area and engaging with City Staff to advance a formal Block Plan Application. Efforts to advance **a formal Block Plan Application have been significantly delayed and constrained due to the ongoing uncertainty surrounding the configuration of major transportation infrastructure in the area, including the GTA West Corridor.** These unresolved planning variables have restricted the ability to finalize a comprehensive land use strategy for the Block Plan.

As shown in **Attachment 2**, the Block 40-5 LOG has recently prepared a preferred Draft Block Plan that identifies a conceptual hydro/transmission corridor located within the current FAA and immediately adjacent to the proposed Highway 413 right-of-way. This configuration represents the most efficient use of land, as it protects higher-value development blocks and supports the delivery of additional housing on lands that are better suited for urban development.

If the Transmission Corridor were to be located elsewhere, it would not only result in a less efficient land use pattern but would also undermine the considerable progress made by the Block 40-5 LOG in its ongoing discussions with the City regarding the formal Block Plan Application. Any such change at this stage would introduce further delays and ultimately impede the timely delivery of both housing and employment within the Block 40-5 area.

4. As illustrated in **Attachment 1**, the limits of the proposed October 2025 NWGTA NAI are situated over lands that the City has conceptually identified for Natural Heritage System (NHS) functions and Mixed Use/Employment Special Policy Areas. Aligning the Transmission Corridor immediately adjacent to the Highway 413 right-of-way will help maintain the integrity of these planned areas and support efficient development, including opportunities for higher-density built form where appropriate.

Conversely, **locating the Transmission Corridor elsewhere within Block 40-5 would risk fragmenting both the Natural Heritage System and future neighbourhoods.** Such fragmentation would reduce land-use efficiency, constrain development block configurations, and ultimately diminish the quality and quantity of future housing and employment opportunities within Block 40-5

4. Refining the NWGTA NAI and releasing the impacted lands will allow ongoing development applications to advance, including within Block 40-5, and **support the repeal/modification of the City of Brampton's Interim Control By-law 306-2003.** This

will contribute to the delivery of much-needed housing in this part of the GTA, however, we again encourage an efficient land design abutting the Highway 413 Right-of-Way that minimizes impact on adjacent planned/existing land uses.

5. We understand that there are existing and ongoing studies applicable to the Highway 413 FAA that include the NWGTA NAI in their scope. **We encourage the MEM to refer to and utilize those studies to support and expedite the necessary work required to refine the NWGTA NAI and the future NWGTA Transmission Corridor Environmental Assessment.** Referring to existing and ongoing studies that are applicable to the lands impacted by the NWGTA NAI will reduce duplication of effort, streamline review, expedite the planning process and accelerate housing approvals.

We appreciate the opportunity to provide these comments and reserve the right to submit additional input on the NWGTA NAI. We have shared similar comments with the City of Brampton and also intend to raise our concerns directly with the Independent Electricity System Operator (IESO), which is responsible for undertaking the NWGTA Transmission Corridor Study.

GSAI and the Block 40-5 Landowners Group would be pleased to meet or discuss these matters further, either in person or virtually. Please feel free to contact the undersigned should you have any questions or require additional information.

Sincerely,

GLEN SCHNARR & ASSOCIATES INC.



Patrick Pearson, MCIP, RPP
Associate

cc. *Bram West Precinct 40-5 Landowners Group*
Mayor and Members of City Council
Steve Ganesh, Commissioner of Brampton Planning
C. Chung, Managing Partner, GSAI
Z. Bouchard, Planner, GSAI

Attachment #1: Bram West Secondary Plan Draft Land Use Concept (City of Brampton, June 2025) with Proposed NAI Overlay (GSAI, October 21, 2025)

Attachment #2: Block Plan 40-5 LOG Concept Plan with Proposed NAI Overlay (GSAI, October 21, 2025)