



INTERNAL MEMORANDUM

TO: A. B. Marshall, Chief Administrative Officer

FROM: Melissa Ricci, Senior Policy Planner

DATE: April 22, 2020

RE: Town of Halton Hills Comments on the Proposal to identify and protect a corridor of land for future electricity infrastructure in the Greater Toronto Area

Under the Emergency Management & Civil Protection Act (Revised Statutes of Ontario, 1990, Chapter E.9); and the delegated authority given to A. B. Marshall, Chief Administrative Officer for the Town of Halton Hills we hereby request the following:

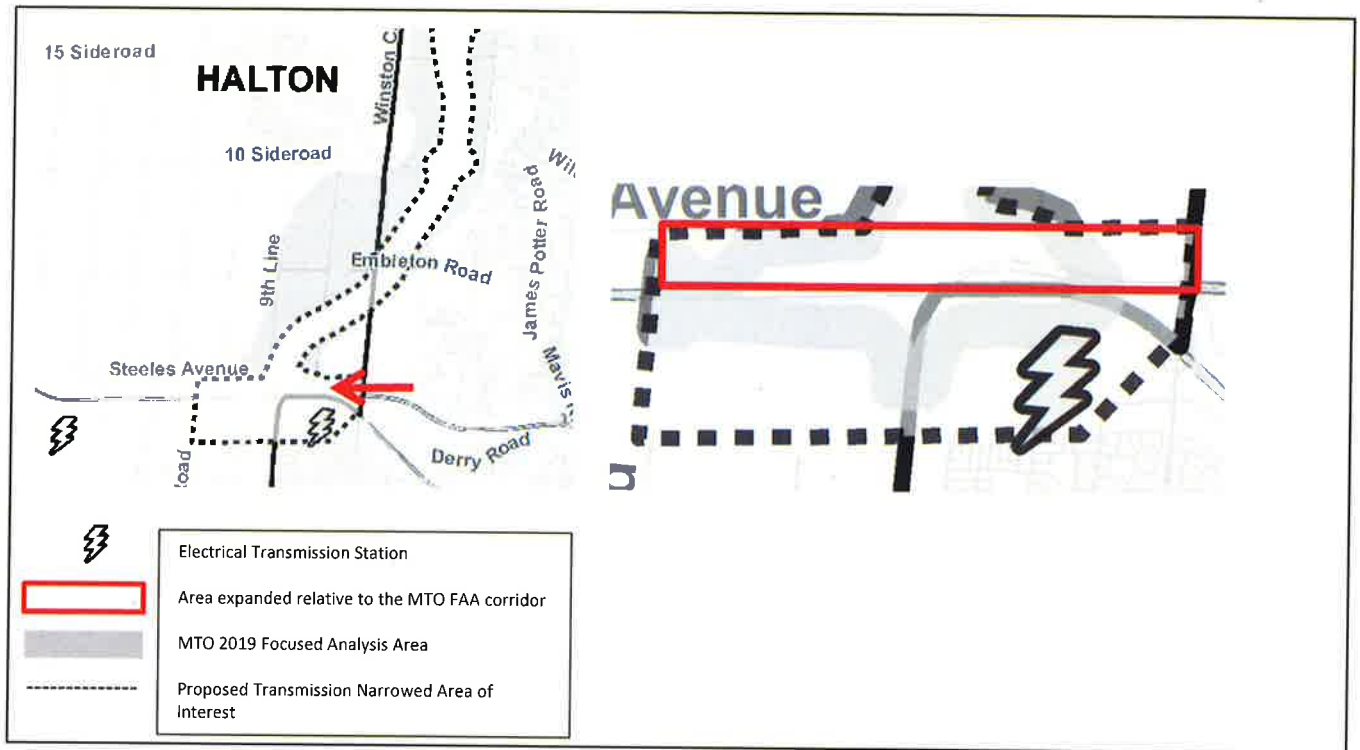
REQUEST:

The purpose of this Memorandum is to obtain approval for staff comments on the proposal to identify and protect a corridor of land for future electricity infrastructure in the Greater Toronto Area posted on the Environmental Registry of Ontario (ERO) on March 23, 2020. The Ministry of Energy, Northern Development and Mines (MENDM) has asked that all feedback pertaining to the Study Area and the guiding principles that will be considered in conducting the study be submitted through the ERO by May 7, 2020. Planning and Economic Development staff have worked in collaboration to prepare comments outlined in this Memorandum as the ultimate location of the electricity infrastructure corridor has potentially significant land use planning and economic development implications.

RATIONALE:

The purpose of the study is to identify and protect a corridor of land in the Northwest GTA for a future electricity corridor to support growth in Halton, Peel and York Regions. While the study is underway, the study area is subject to protection under policies in A Place to Grow: Growth Plan for the Greater Golden Horseshoe and the Provincial Policy Statement, 2020 (in effect on May 1, 2020). The outcome of the Study will be a recommendation specifying the land area to be protected from development in order for the area to be preserved for future transmission infrastructure. While the majority of the Study Area aligns with the GTA West Transportation Corridor Focused Analysis Area (FAA), there is a portion of land located south of Steeles Avenue, east of Eighth Line, west of Winston Churchill Boulevard and north of Highway 407, that extends beyond the GTA West Transportation Corridor FAA (see Figure 1 below). The areas that differ from the GTA West Transportation Corridor FAA are planned to accommodate transmission infrastructure connection points.

Figure 1: Main Area of Concern for the Town of Halton Hills (identified in the Town's Official Plan as Premier Gateway Employment Area Phase 2A)



Source: Environmental Registry of Ontario website

The proposal indicates that since consideration is being given to the opportunity to co-locate the transmission corridor within the Ministry of Transportation's proposed GTA West Transportation Corridor, the study timeline will be aligned with key milestones related to the Ministry of Transportation's Environmental Assessment. However, an estimated timeline for when the Study will be completed has not been provided.

Town of Halton Hills Comments and Concerns with the NWGTA/IESO Transmission Corridor Study:

- The proposal highlights that corridor routing should minimize impacts on existing municipal plans in the study area, including impacts on existing built up areas, cultural heritage, planned developments and airports. The Town of Halton Hills Premier Gateway Phase 2A and western portion of Phase 1A lands are located in the area that differs from the GTA West Focused Analysis Area (FAA). These lands are strategically located along the Hwy 401/ Hwy 407 Corridor (south of Steeles Avenue, east of Eighth Line and west of Winston Churchill Boulevard). The lands have been identified by the Ministry of Municipal Affairs and Housing (MMAH) as a Provincially Significant Employment Zone (PSEZ), which emphasizes their key role in helping drive job growth and prosperity across the region. It is also worth noting that there is existing development already located in the area west of Eighth Line and south of Steeles Avenue (i.e., Toronto Premium Outlets). While the Town understands the importance of planning for a transmission corridor of this nature, there is a significant concern that the additional areas contemplated for connection

infrastructure that are outside the GTA West FAA, will sterilize the development potential of these lands. Any further delays in finalizing this and other provincial studies impacting lands in the Premier Gateway will have substantially negative impacts on the Town's economy and finances, with associated negative impacts on the broader region due to delays in economic development.

To allow for development, the Town requests that the Province identify alternative areas for infrastructure connection and explore other approaches/technologies such as the burial of connection infrastructure.

- The proposal indicates that MENDM will align the timing of this study with milestones related to the Ministry of Transportation's Environmental Assessment. There is significant concern that there are no set timelines for completion of the NWGTA/IESO Transmission Corridor Study. The indefinite nature of study completion introduces significant uncertainty and risks, thereby undermining the ability of investments to move forward in the area, including major active files. This puts non-residential investment and associated jobs at risk at a time when they are urgently needed, both locally and regionally.

The Town respectfully requests that the appropriate planning, scheduling work and coordination between GTA West and NWGTA/IESO Transmission Corridor teams take place to establish more definite timelines for the completion of the study. Complex projects of this nature always incorporate a tentative date of completion so it is unusual for a project of this magnitude to not have an end in sight.

- The uncertainty related to the timing of study completion will potentially result in a number of missed major economic development opportunities for the Town. For example, a major development and job creation proposal by Conestoga Cold Storage is currently impeded by the development freeze on certain lands within the additional lands identified as necessary for NWGTA/IESO connection infrastructure. This situation is described in more detail within the attached letter sent from the Mayor of Halton Hills, Rick Bonnette, to Minister Steve Clark (MMAH) on March 25, 2020 (see Appendix 1).
- In addition, the Town is in the process of initiating the Premier Gateway Phase 2B Employment Area Integrated Planning Project to proceed with the development of approximately 257 hectares of employment lands located north of Steeles Avenue, between Eighth Line and Winston Churchill Boulevard. The Project is expected to be completed in approximately three years. Considering that these lands are designated for employment uses in the Official Plan and have been identified as a Provincially Significantly Employment Zone by the Ministry of Municipal Affairs and Housing (MMAH), it is the intent of the Town to ensure that the lands are ready to be developed as soon as the required planning studies are completed. The uncertain timing of the NWGTA Transmission Corridor Study means that a large portion of the Premier Gateway Phase 2B Secondary Plan could be under corridor protection policies for a long period of time. This can cause a delay in developing the lands in a timely fashion and leveraging the economic potential of the area.

Economic development implications and risks being caused by the Study need to be carefully considered and the study process refined accordingly to minimize these risks.

Once approved by the Chief Administrator Officer, these comments will be forwarded to the Ministry of Energy and Northern Development and Mines, the Ministry of Municipal Affairs and Housing, the Ministry of Transportation and the Region of Halton. The comments will also be uploaded to the Environmental Registry of Ontario.

FINANCIAL IMPLICATIONS:

There are no financial implications at this point. However, considering the proposed Study Area and undefined timeline for completing this study, it is anticipated that the corridor protection policies in place will have financial implications for the municipality in the future due to the inability to develop key provincially significant employment lands, leading to a loss of non-residential assessment and associated jobs.

PURCHASING APPROVAL: Yes No N/A

TREASURER APPROVAL: Yes No N/A

Reviewed by:



J. Linhardt, Commissioner of Planning and Development

Approved by:



A.B. Marshall, Chief Administrative Officer

Date:

April 29 / 20