



WESTON CONSULTING

planning + urban design

Ontario Ministry of Energy, Northern
Development and Mines
Network and Microgrid Policy Section
77 Grenville Street, 6th Floor
Toronto, ON
M7A 2C1

June 5, 2020
File 6053

Attn: Kirby Dier, Senior Policy Advisor

**Re: Submission of Commentary and Request for Consideration
Northwest Greater Toronto Area (NWGTA) Energy Infrastructure Corridor
11970 Highway 50 (PINS: 14213-0104 & 14213-0102)
Southwest Corner of Highway 50 and Mayfield Road
City of Brampton**

Weston Consulting is the planning consultant for 809017 Ontario Limited, the owners of the lands municipally addressed as 11970 Highway 50 in the City of Brampton (herein referred to as the 'subject lands'). We have been engaged to provide assistance to the owners related to various planning matters, including monitoring the Greater Toronto Area West Transportation Corridor Route Planning and Environmental Assessment (GTA West Study), and Northwest Greater Toronto Area Transmission Corridor Identification Study (NWGTA Study) that the Province of Ontario and Independent Electricity Systems Operators (IESO) are currently undertaking.

The subject lands are located on the southwest corner of Mayfield Road and Highway 50 in the City of Brampton. The subject lands are comprised of two parcels with a total area of 27.9 hectares (68.8 acres) and are occupied by a single-detached dwelling and associated structures.

The purpose of this letter is to provide a formal response to the Ministry of Energy's Call for Comment to the NWGTA Study and request the co-location of the NWGTA Study Narrowed Area of Interest with the GTA West Study Technically Preferred Route on the southern portion of the subject lands (see enclosed map entitled *GTA West Transportation Corridor Route S6-1 & NWGTA Narrowed Area of Interest*).

Applicable Policy Context

Provincial Policy Statement (2020)

The Provincial Policy Statement (PPS) provides direction on land use planning throughout the Province of Ontario, and requires towns and cities, among other things, to:

- Efficiently manages resources, land and infrastructure;

- Protect the environment and resources; and,
- Encourage employment and residential development and supporting a mix of land uses within the province.

The PPS states that the co-location of linear infrastructure *should be promoted, where appropriate* (Policy 1.6.8.5). It is the intent of the PPS to plan for growth in Peel Region and the GTA, and to accommodate growth through *Transportation and Infrastructure Corridors*. The Province is currently assessing transportation and energy infrastructure corridors to support growth within GTA West Study Technically Preferred Route and NWGTA Study Narrowed Area of Interest.

Growth Plan for the Greater Golden Horseshoe (2019)

While the PPS provides overall policy direction specifically related to matters of Provincial Interest, the Growth Plan for the Greater Golden Horseshoe (Growth Plan) also provides direction on the development and growth of communities within the Greater Golden Horseshoe. As such, the two should be received in conjunction.

The intent of the Growth Plan is to guide growth for the development of compact and vibrant communities and to plan and manage growth in order to support a strong and competitive economy. Planning decisions are required to conform or not conflict with the Growth Plan for the Greater Golden Horseshoe.

The Growth Plan states that the Province, when *planning for development, optimization or expansion of existing and planning corridors and supporting facilities...will:*

- encourage the co-location of linear infrastructure where appropriate;*
- where applicable, demonstrate through an agricultural impact assessment or equivalent analysis as part of an environmental assessment, that any impacts on the Agricultural System have been avoided or, if avoidance is not possible, minimized and to the extent feasible mitigated; and*
- where applicable, demonstrate through an environmental assessment, that any impacts on key natural heritage features in the Natural Heritage System for the Growth Plan, key hydrologic features and key hydrological areas have been avoided or, if avoidance is not possible, minimized and to the extent feasible mitigated. (Policy 3.2.5.1).*

It is the intent of the Growth Plan to facilitate a coordinated effort to land use planning and growth in the Province. This includes ensuring that development of strategic employment lands not be compromised and that planning for infrastructure to support growth in the Province be coordinated with all stakeholders to ensure sustainability for the future.

Region of Peel Official Plan (2018 Office Consolidation)

The Region of Peel Official Plan was adopted by Council on July 11, 1996 and was approved with modifications by the Minister of Municipal Affairs and Housing through the Minister's Notice of Decision on the Plan date October 22, 1996. The 2018 Office Consolidation includes policy changes up to the most recent Official Plan review, and includes Ministry and OMB/LPAT

approvals as well as other amendments. A number of the Regions' Official Plan schedules are still under appeal.

The subject lands are designated *Urban Systems* and *Greenfield Area* in the Region of Peel Official Plan. Development and growth are anticipated on the subject lands, as the Region has planned that *Designated Greenfield Areas* to attract a minimum density of 50 persons and jobs combined per net hectare by 2031.

City of Brampton Official Plan (2013 Office Consolidation)

The City of Brampton 2006 Official Plan (2013 Consolidation) was approved in part by the OMB by Order in October 2008. Parts of the 2006 Official Plan are still under appeal.

The Brampton Official Plan contemplates future Employment Uses on the subject lands, as the main designation on the subject lands is *Industrial*, which permits a range of Employment-related uses, including, industrial, manufacturing, distribution, and warehousing.

In addition, the subject lands are designated as *Prestige Industrial* per the City of Brampton's Highway 427 Industrial Secondary Plan, which encourages major employment growth and development on the subject lands, and to this part of the City. The permitted uses include research and development facilities, communications/telecommunication facilities, and among others, manufacturing, processing and warehousing.

Aside from the employment related land uses, additional designations that apply to the subject lands subject lands relate to the lands' the natural heritage features (Open Space), and the protection of a future infrastructure corridor (Parkway Belt West).

The planned land use for the subject lands is employment-industrial, and has been identified by the Brampton Official Plan as an area that will introduce and support employment-related uses that benefits the City, Region and Province's economy.

City of Brampton Zoning By-Law (270-2004)

The City of Brampton Zoning By-law applies site- and area-specific regulations that determines the use of subject lands. The Brampton Zoning By-law currently zones the subject lands *Agricultural*, which only permits agriculture and agricultural-related uses. The intent of the land owner is to conform with the City of Brampton and Peel Region Official Plans, which plans for employment-related development on the subject lands. A Zoning By-law Amendment application is required to facilitate consistency with policy statements and the Official Plans.

GTA West and NWGTA Corridor Studies

Through an updated preliminary GTA West Corridor Environmental Assessment document, the Ontario Ministry of Transportation identified a Technically Preferred Route for the GTA West Highway Corridor, which was presented to the public in Fall 2019. As previously mentioned, the subject lands are located within the revised NWGTA Proposed Narrowed Area of Interest, released in 2020 and the GTA West Technically Preferred Route (identified by the MTO as Route S6-1), released in September 2019.

Should the GTA West Study and the NWGTA Study proceed concurrently, Weston Consulting respectfully requests that the planned energy infrastructure associated with the NWGTA Study be consolidated and co-located with the Ministry of Transportation's preferred alignment.

It is acknowledged that the technical work and studies undertaken as part of the EA process, including feedback obtained through stakeholder consultation will inform the capital project. As such, we request that the subject lands' existing natural heritage features, key hydrological features and existing/future land use be considered in co-locating all infrastructure components as closely aligned with the MTO Technically Preferred Route S6-1.

If the tests as specified in Policy 1.6.8.5 of the PPS and Section 3.2.5.1 of the Growth Plan are confirmed, we believe that the co-location of the infrastructure components for both provincial capital projects would be in the best interest of the Province and the landowner, as it reduces the impact of the infrastructure project on the total land area, would limit impacts to environmental and natural features, and would support provincial policy that supports development and growth of employment-oriented uses in the future.

We kindly request to be notified of any future reports, meetings or consultations, and decisions regarding the GTA West Study and NWGTA Study. If you have any questions or require further information, please contact the undersigned at ext. 320 or Mathew Halo at ext. 282.

Yours truly,

Weston Consulting

Per:



Tara Connor, MCIP, RPP
Senior Planner

- c. Ryan Guetter, Weston Consulting
- Cisca McInnis, Ontario Ministry of Energy
- Lukasz Grobel, Ontario Ministry of Transportation
- Jim Dowell, WSP on behalf of MTO
- Client