December 4, 2022

Ministry of Municipal Affairs and Housing

Office of the Minister

777 Bay Street, 17th Floor

Toronto, ON, M7A 2J3

Attn: Honourable Steve Clark, Minister of Municipal Affairs and Housing

Dear Minister Clark,

**Re: Kaneff Group Comments on proposed amendments to the Greenbelt Plan (ERO No. 019-6217)**

On behalf of the Kaneff Group, we would like to first commend your efforts in ensuring that over the next decade, the 1.5 million newcomers to our Province, 70% of which will settle in the GTA and surrounding areas, will have decent and affordable housing options. We support your vision and leadership in promoting reasonable policies to engender that plan; specifically, your government’s decision to remove an immaterial portion (less than 1%) of developable lands from the Greenbelt. By doing so, you will be allowing responsible companies like ours – a long-established developer and builder of purpose-built rental housing – to create shelter so desperately sought and needed for Ontarians.

Accordingly, we ask that you consider the removal of the following lands from the Greenbelt for 3 main reasons: (1) the lands are within the urban boundary or adjacent to urban areas (2) the lands are close to major transport routes; (3) the lands have services & amenities nearby.

Thank you for taking the time to review our concerns. We hope that our perspective provides insight on your decision-making process. We appreciate the opportunity to provide comments on the proposed changes to the Greenbelt, and we look forward to your consideration.

Sincerely,

The Kaneff Group

1. **Royal Niagara Golf Club, 1 Niagara-on-the-Green Boulevard, Niagara on the Lake & St. Catharines**

Firstly: PT TWP LT 10 STAMFORD; PT TWP LT 11 STAMFORD PT 8, 9 & 10, 59R5648 & PT 3, 4 &5, 59R1065; S/T RO246385; NIAGARA FALLS (PIN 64051-0079 (LT))

Secondly: PT LT 4-5 CON 10 GRANTHAM; PT RDAL BTN LT 4 & LT 5 CON 10 GRANTHAM; PT RDAL BTN TWP OF THOROLD & TWP OF GRANTHAM; PT RDAL BTN TWP OF (PIN 46416—0563 (LT))

Thirdly: PCL 3-1, SEC CON 10; NIAGARA-ON-THE-LAKE; PT LT 3 CON 10 GRANTHAM; PTS 1, 2 & 3 30R9466,S/T GRN40947; NIAGARA-ON-THE-LAKE (AMENDED 99.09.10 GB)(PIN 46416-0587 (LT))

Fourthly: PT LT 3-4 CON 10 GRANTHAM; PT RDAL BTN TWP OF STAMFORD & TWP OF GRANTHAM CLOSED BY RO754201 PT 2, 3, 4, 5 & 7, 30R 5262; S/T GRN40705; ST. CATHARINES (PIN 46416-0568 (LT))

Fifthly: Part of Lot 6, Concession 10, Township of Grantham, City of St. Catharines (PIN 46416-0897 (R))

Sixthly: PART OF LOT 5, CONCESSION 10, GRANTHAM, PARTS 9, 10, 11, AND 12, ON PLAN 30R15197; ST. CATHARINES; TOWN OF NIAGARA-ON-THE-LAKE (PIN 46416-1844 (LT))

Seventhly: PART OF THE ROAD ALLOWANCE BETWEEN THE TOWNSHIP OF THOROLD & THE TOWNSHIP OF GRANTHAM , PARTS 1 AND 2 ON PLAN 30R15197; ST. CATHARINES; TOWN (PIN 46416- 1842 (LT))

Eighthly: PART OF LOT 1, TOWNSHIP OF THOROLD; PART OF LOTS 10 & 11, TOWNSHIP OF STAMFORD; PART OF THE ROAD ALLOWANCE BETWEEN THE TOWNSHIP OF THOROLD (PIN 64051-0133 (LT))

The subject lands are located within the boundary of the Niagara Escarpment Plan and Greenbelt Plan, while being surrounded by major urban contexts. The Site has superior servicing and infrastructure available, with access to highways 406, 405, and the QEW. The Niagara Region is expected to receive regular GO Train service which would benefit the accessibility of the Site.

Map

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