

November 28, 2023

Honorable Paul Calandra  
Ministry of Municipal Affairs and Housing  
Planning and Growth Division  
777 Bay Street, 12<sup>th</sup> Floor  
Toronto, ON M7A 2J3

VIA EMAIL: [greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)

Dear Minister Calandra:

**RE: Proposal to Return Lands to the Greenbelt – *Greenbelt Statute Law Amendment Act, 2023*  
ERO # 019-7739  
Main Street Lands, Town of Grimsby (Map Reference #11)**

On behalf of the development group comprised of DeSantis Homes, Melrose Investments and Valery Group (together referred to as “DMV”), this letter is being submitted in response to the above noted ERO posting regarding the Government’s Proposed Amendments to the Greenbelt Plan.

As you may be aware, DMV has been in discussions with the Office of the Provincial Land and Development Facilitator (the “OPLDF”) regarding the lands located on Main Street East, bounded by Oaks Road to the east, Craig Boulevard/Linda Street to the west and the CN tracks to the north in the Town of Grimsby (the “Subject Lands”) subsequent to the government’s removal of the Subject Lands from the Greenbelt Area in December 2022 (ERO Posting # 019-6216). We are writing to request that the Subject Lands continue to remain outside of the Greenbelt.

Over the course of the last year, DMV has been working diligently with the OPLDF, Town of Grimsby, Region of Niagara, and Habitat for Humanity to secure Development Agreements that would provide over 500 new homes by 2025 and to ensure that *growth pays for growth*. A Pre-Consultation Application for plans of subdivision to create residential blocks, municipal streets, a naturalized channel, parkland, and SWM facilities was submitted to the Town on August 17<sup>th</sup>, 2023. This plan was informed by multiple technical studies by natural heritage, transportation, archaeology, acoustic engineering, civil engineering, and planning disciplines to demonstrate that the proposal will satisfy the applicable planning policy and be developed in accordance with the Town and Regional guidelines/standards.

This request is appropriate as the Subject Lands meet the criteria for Strategic Removals that were identified via ERO # 019-6216, being that they are (1) adjacent to existing settlement areas; (2) located on the edge of the Greenbelt area boundary; (3) able to be serviced in the near term with local infrastructure upgrades to be entirely funded by the developers; and, (4) are not encumbered by any significant natural heritage features and have the characteristics that would enable housing to be built in the near term. Moreover, in the enclosed Greenbelt Amendments and Motions report PA-23-36 that was endorsed by

Town of Grimsby Council at the November 20<sup>th</sup>, 2023 meeting, Town staff have requested that the Province exclude the Subject Lands from the land to be returned to the Greenbelt so that they can be considered for inclusion in the Town's urban area.

There is an extensive history relating to the Subject Lands that is unique from other parcels that were included in the Greenbelt removal via ERO # 019-6216. The Town and Region have continuously advocated for the lands to be available for urban expansion to accommodate much needed growth, and their requests for expansion into the Greenbelt lands go back as far as the enactment of the *Greenbelt Act* in 2004/2005.

In 2005, the Town of Grimsby Growth Management Study identified the Subject Lands as a potential development area (Area #2 on Map 11-4 Potential Development Areas appended to PA-23-36 as Appendix 'A'). Subsequent enactment of the Greenbelt Plan removed the possibility of future expansion of the urban boundary with those lands, despite Town staff having identified that the Greenbelt plan designations were inconsistent with the regional and local official plan mapping in effect at the time. In 2016/2017, the Town requested again that the Subject Lands be removed and put forward a land exchange at the time of the Coordinated Review of the Growth Plan, Greenbelt Plan and Niagara Escarpment Plan. This request was supported by a Town-initiated Agricultural Study demonstrating that the Subject Lands are unsuitable for the production of speciality crops and therefore appropriate for removal from the speciality crop area designation (Appendix 'B' of PA-23-36). In 2017, former Town of Grimsby Mayor Bentley submitted correspondence to the Province requesting redesignation (Appendix 'C' of PA-23-36). Most recently, in response to the December 2022 ERO posting of amendments to the Greenbelt Plan boundary (ERO Posting # 019-6216), Regional council endorsed staff report PDS-27-2022 that endorsed the removal of the Subject Lands from the Greenbelt Area.

Removal of the Subject Lands from the Greenbelt is logical, reasonable, and supported by the Regional and local staff and Council. Therefore, we reiterate our request to exclude the Subject Lands from those to be returned to the Greenbelt, allowing for the balance of the approvals process to unfold for the proposed development of over 500 new dwelling units in support of the government's objective to address Ontario's housing crisis.

Thank you,



Amber Lindsay  
Director of Development

CC. Adam Cairns, Melrose Investments  
Fernando Puga, DeSantis Homes  
Martha Greenberg, Deputy Minister, Municipal Affairs and Housing  
Sean Fraser, Assistant Deputy Minister, Municipal Affairs and Housing, Planning and Growth Division  
Paula Dill, Office of the Provincial Land and Development Facilitator