

November 30, 2023



Via ERO Online

Provincial Land Use Plans Branch

13th Floor – 777 Bay Street

Toronto, ON | M7A 2J3

**RE: ERO Number: 019-7739 | Proposed Greenbelt Statute Law Amendment Act
502 Winston Road, Town of Grimsby**

New Horizon Development Group c/o 502 Winston Road Inc. is the owner of the lands municipally known as 502 Winston Road in the Town of Grimsby. New Horizon Development Group is a developer based out of Burlington. We are proud to have built over 30 communities ranging from ground-related housing to high-rise, mixed-use buildings throughout the Greater Golden Horseshoe during our 30-year history. We have consistently sought to provide quality housing to enhance existing communities and would like to thank you for the opportunity to comment on the proposed Greenbelt Statute Law Amendment Act via ERO No. 019-7739.

In November 2022, the Ministry of Municipal Affairs and Housing announced that the Province would remove or redesignate 15 different areas of the existing Greenbelt. One of the changes made to the Greenbelt was the redesignation of a 5.7-hectare property located at 502 Winston Road in the Town of Grimsby from 'Specialty Crop Area' designation to the 'Greenbelt Towns/Villages' designation. New Horizon Development Group is the parent company of 502 Winston Road Inc., the registered landowners of 502 Winston Road in the Town of Grimsby.

The 'Specialty Crop Area' Designation is defined in the Greenbelt Plan as *"areas designated using guidelines developed by the Province, as amended from time to time. In these areas, specialty crops are predominantly grown such as tender fruits (peaches, cherries, plums), grapes, other fruit crops, vegetable crops, greenhouse crops, and crops from agriculturally developed organic soil, usually resulting from:*

- a) soils that have suitability to produce specialty crops, or lands that are subject to special climatic conditions, or a combination of both;*
- b) farmers skilled in the production of specialty crops; and*
- c) a long-term investment of capital in areas such as crops, drainage, infrastructure and related facilities and services to produce, store, or process specialty crops".*

The subject property currently does not contain any specialty crops, or any crops in general, which would align with the definition outlined above. Further, the existing condition of the site is not agricultural in nature, rather it is used as a multi-purpose community space which is being rented by a church group. This has been the historic condition for the property for over 90 years. Additionally, the soil on site is not suitable to produce the specialty crops outlined in the definition for Specialty Crop Areas. Accordingly, the 'Specialty Crop Area' designation does not accurately reflect the existing conditions of the subject property.

Since the November 2022 announcement, our team has been working diligently alongside the Provincial Land Development Facilitator to prepare and advance a development concept on the subject property which meets the Province's housing and affordability goals. Through this collaboration, a development concept which included over 1,400 residential units contained multiple dwellings and townhouse dwellings as well as a range of community benefits was agreed to in principle with the Town of Grimsby and the Provincial Land Development Facilitator. Notably, one such community benefit was the enhancement to the existing shoreline protection wall running along the northern boundary of the site to mitigate erosion of the land. Further, community benefits included in the development proposal include affordable housing, cash contributions to the Town, creation of additional privately owned public space

and the establishment of a 30-metre-wide public park which would run the length of the shoreline and be dedicated to the Town of Grimsby.

On October 23, 2023, Minister Calandra of the Ministry of Municipal Affairs and Housing (MMAH) announced that the Province intended to reverse the Provincial changes made to the Greenbelt Plan throughout the region which were enacted on November 4, 2022. The Province invited the various impacted municipalities to submit any other updates they would like made to the Greenbelt Plan boundaries in relation to the November 2022 Provincial modifications. These changes will be implemented through the subject *Greenbelt Statute Law Amendment Act, 2023*. The Region of Niagara Staff Report (PDS 27-2022) dated December 1, 2022 and included as Appendix A to this letter, endorsed the changes made by the Province as they were consistent with previously requested mapping corrections made by Regional Council to recognize historic Greenbelt mapping errors. The report expands on this recommendation stating that “based on existing non-agricultural uses and the previous evaluation of the lands, staff do not object to the changes proposed for the two sites in Grimsby”.

Similarly, through the November 20, 2023 Staff Report (PA-23-36) included as Appendix B to this letter, the Town of Grimsby Planning Staff reviewed the previous Greenbelt modifications made to the 502 Winston Road site and recommended that Council request that the Province not include the parcel in the Greenbelt through Bill 136. Specifically, Town staff state in their Report “These lands are adjacent to the existing urban boundary and servicing. They represent a logical extension of the urban area...Expansions in the northern area would continue the development of the Grimsby on the Lake / Winston Road neighbourhood. Potential expansions...would support the Town’s efforts to provide additional housing choice, and balance the tax-base to leverage additional commercial / industrial development”. Accordingly, the Town of Grimsby Council made a motion to support the Town Staff’s recommendations requesting the Province not include the parcels identified in Map 11 of their Staff Report in the Greenbelt through Bill 136.

As the Province works to address the housing crisis currently facing Ontario, the efficient development of residential units will become even more critical to achieve the increased housing supply desired across the various regions of the Greater Golden Horseshoe. Given their greenfield nature and ability to accommodate current trends in the housing industry, the subject lands in Grimsby are well suited for development opportunities which can aid in providing desired community benefits in addition to the implementation of the housing development.

As proposed, the aforementioned development is supported by both New Horizon Development Group as well as the Region of Niagara and Town of Grimsby Planning Staff and Council. The development proposal ensures the goals and objectives of the Province are realized, and align with realistic growth and development outcomes for the municipality. As such, this is to acknowledge our alignment with the Town of Grimsby stance that the Province reconsider the re-instatement of the subject lands as Specialty Crop area by retaining the Towns/Villages designation within the Greenbelt Plan.

Thank you for this opportunity to comment on the new Niagara Region Official Plan. Please feel free to contact the undersigned.

Regards,



Jeff Paikin, President

New Horizon Development Group

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Encl. (2) - Appendix A – Niagara Region Staff Report PDS 27-2022
Appendix B – Town of Grimsby Staff Report PA-23-26