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February 27, 2017

Greenbelt Site Specific Review
Ministry of Municipal Affairs
Central Municipal Services Office
777 Bay Street, 13th Floor
Toronto, ON M5G 2E5

Email: greenbeltboundary@ontario.ca

TO WHOM IT MAY CONCERN:

RE: GREENBELT SITE SPECIFIC REVIEW – TOWN OF GRIMSBY SUBMISSION

On behalf of the Town of Grimsby, I am writing to provide our response to the proposed minor changes to the greenbelt boundary as released on January 11, 2017.

We are disappointed to see that our requests have not been reflected in the most recent release. The Town's submissions echoed similar ones that the Town put forward prior to the implementation of the Greenbelt Plan in 2005. These were also ignored; however, the Minister of Municipal Affairs at the time assured the Town of Grimsby that its concerns would receive fair and thorough consideration in the 2015 ten-year review. The Town has provided undisputable evidence to the Province that certain lands have been improperly designated, but we find that our requests have still been ignored.

The crux of the Town of Grimsby's issue is that when the Greenbelt Plan was implemented in 2005, approximately 280 hectares of land in Grimsby, located north of the Niagara Escarpment were identified as Specialty Crop – Tender Fruit and good Grape Lands, effectively freezing these lands for anything but specialty crop production. It is the Town's contention that much of these lands are improperly designated and inappropriate for Specialty Crop and that the following changes to the mapping in the Greenbelt Plan should be implemented:

- Schedule 2 of the Greenbelt Plan All lands located within Grimsby located north of the Niagara Escarpment Plan Area which are already developed, as detailed on the mapping provided by the town, should be redesignated from Tender Fruit and Grape Lands to Towns and Villages within the Greenbelt Plan.

- Schedule 2 of the Greenbelt Plan – All lands required for the future Grimsby GO Train Station as defined by the Niagara Region GO Hub Study and associated adjacent lands required for a viable GO Hub should be redesignated from Tender Fruit and Grape Lands to Town’s and Villages within the Greenbelt Plan.
- Schedule 4 of the Greenbelt Plan – All lands located in Grimsby located North of the Queen Elizabeth Way, which are identified as Natural Heritage System should be refined to reflect updated mapping in the approved (2012) Greenbelt and growth plan compliant Grimsby Official Plan which scoped the area of the Natural Heritage System, as the province has done in other areas.

Attached to this letter are maps, which illustrate the extent of the town’s request.

Noted on the right are two pictures of two developed subdivision whose lands are classified as Specialty Crop. If our request is denied, these are but two examples of lands for which we would like an explanation as to why they should remain designated as Specialty Crop. There are errors in the Greenbelt mapping in Grimsby.

Additionally, Grimsby has followed the intent of Section 11 of the Greenbelt Act (2005, as amended) related to Amendments to the plan by submitting a proposal, which would result in a net increase of the total land area of the plan, by 713 hectares. Grimsby’s proposal to add 923 hectares to the Greenbelt area located south of the escarpment area was explicitly for an exchange of lands to be removed or redesignated north of the escarpment.

The basis of the Town’s submission requesting redesignation of certain lands, which are currently identified as specialty crops to Towns and villages, includes the following:

- **Lands located North of the QEW Highway**
This area comprises approximately 130 Hectares, which is broken down as follows:
 - o 11 hectares are a private recreation area
 - o 29 hectares are developed as radio tower lands with topsoil stripped and infrastructure in the ground
 - o 15 Hectares are Former Sewage lagoons set aside as a natural bird habitat
 - o 29 hectares are an active Rifle Range, founded during WW1 with extensive lead pollution due to spent ammunition from the nearly 100



years that the range has been in operation. It is anticipated that the remediation of the polluted lands for tender fruit agriculture is simply not feasible as the costs would be prohibitive.

- 8 hectares are a Protected Woodlot on federal lands and natural Habitat
 - 19 hectares are an active Conservation/Recreation Area
- Although the above uses comprise the entirety total of the area and are therefore wholly unsuitable for specialty crop agriculture as a result, we have prioritized our request to 95 hectares as noted in our attached mapping.

- **Lands located South of the QEW Highway**

This area comprises approximately 150 Hectares, which is broken down as follows:

- 26 hectares are Existing Residential and Subdivisions that have been in place as far back as the 1950s and 60s
 - 6 hectares are an active Public School
 - 4 hectares are an active Town Park with Soccer Fields and Baseball Diamonds and Buildings
 - 3.1 hectares comprise the extent of the Livingston Extension Road Allowance, owned by Niagara Region, which was cleared in the 1970s and contains underground servicing.
 - 11 hectares Comprise the Protected Woodlot and Natural Habitat (Irish Family)
 - 6.2 hectares are used by active places of Worship.
- Of the total land area in the specialty crop area south of the QEW over 1/3 of the lands are wholly unsuitable for specialty crop agriculture or designation as such.
- The Province conducted an EA study in 2010, which located a future GO Train Station partially within the Specialty Crop designation south of the QEW Highway. In 2016, Minister Del Duca announced that the Province is committed to extending GO Train Service to and beyond Grimsby by no later than 2021. GO Train service would commence at the Casablanca GO Train Station
- Niagara Region is presently conducting a GO Train Hub Study, which has identified that approximately 8.3 hectares of Specialty Crop designated land would be required for intensified development for a functional GO Train Station.
- Specialty Crop Agriculture requires bird bangers and pesticide spraying which require a minimum distance separation from public uses such as residential and schools, further reducing the extent of land area available for Specialty Crop agriculture.
- The entire area of the Specialty Crop designation in Grimsby located north of the Niagara Escarpment is fully serviced with water and sewer, which was installed at the direction of the province.
- The Town of Grimsby has been a leader in the province in building complete communities, which efficiently utilize available lands with appropriate transit supportive densities and uses.

By allowing lands which are inappropriate for specialty crop agriculture to be considered and planned in the future for urban uses within the Town's and Villages designation, the Town of Grimsby will be able to continue in its efforts to build a model, transit supportive community which is consistent with provincial objectives.

- In the absence of criteria being provided by the province to determine which lands are suitable for Specialty Crop/Tender Fruit and Good Grape Agriculture, the Town of Grimsby commissioned an independent and wholly unbiased study of agricultural viability in Grimsby's west end by a reputable and experienced agricultural consultant. The study was completed by Michael Hoffman, of AgPlan Limited, an expert in the field of agricultural viability Analysis. Mr. Hoffman's study concurred with the assumptions of the Town. The AgPlan report was included with the Town's submission to the Province in October 2016 and was handed personally to the Ministry of Agriculture. The Province had provided no evidence to contradict the conclusions contained in this Report, particularly in relation to the lands we have prioritized in this letter for redesignation. I am resubmitting this study with this letter for your perusal.

The Town's previous submissions to the Province on this matter during the timeline of the current Coordinated Land Use Planning Review included the following:

- Submission to the Honourable David Crombie, Chair of the Coordinated Review Panel, dated April 30, 2015
- Presentation to Lou Rinaldi MPP at the AMO Conference in Windsor and Ministry Staff on August 16, 2016
- Submission to the Honourable Bill Mauro, MPP, Minister of Municipal Affairs concerning the Coordinated Land Use Planning Review, dated October 27, 2016

Additionally the town also undertook to meet with Provincial officials and staff on four occasions both in Grimsby and at Ministry offices to illustrate the situation on the ground and present the Town's case. Through these meetings and evidence presented, the Town of Grimsby has obtained the support of the Ministry of Municipal Affairs and Ministry of Transportation for its arguments that much of the land which is currently designated as specialty crop/tender fruit and good grape in Grimsby's west end. Where the Town's submission did not find favour, as of yet, was with the Ministry of Agriculture. Town and Regional staff met with Ministry of Agriculture (OMAFRA) Staff Tuesday, February 14th, 2017 to discuss the Town's request. The Town's Planner indicated during the meeting that while it was understood that the Greenbelt Boundary was established back in 2005 through a high level mapping exercise, what Grimsby staff see on the ground are large areas which for reasons identified above are wholly unsuitable for Specialty Crop, Tender Fruit and Good Grape production. There are many errors in the mapping and designations that the Town had fully expected all Ministries to be prepared to correct at the ten-year review. When you have more than 26 acres of residential housing and subdivisions within the Specialty Crop designation, containing more than 200 homes there is clearly some truth to the claim that there exist errors in the mapping and designations. These lands are NOT designated Specialty Crop Area – Tender Fruit and Grape Lands by our Provincially approved Official Plan (2012).

Grimsby Understands Agriculture. However, the Town of Grimsby's intent with its various submissions to the Province over more than a decade is to simply recognize the truth in land uses, as they exist on the ground. We seek to determine land use with a true recognition of the actual viability in these developed and fragmented areas to be able to establish and sustain a tender fruit industry. If these lands are indeed inappropriate for Specialty Crop/Tender Fruit and Good grape production, the Town

should be allowed to continue its good work in establishing a complete model, transit supportive community in our west end.

I wish to emphasize that we understand and support the Government's objective of preserving valuable tender fruit and Grape lands and the unique natural treasure that is the Niagara Escarpment. We also support the Province's objectives of forging more complete communities and realizing more efficient use of valuable public infrastructure. This is demonstrated by the fact that Grimsby was one of the first municipalities in Ontario to adopt a new Official Plan and Zoning By-law that were compliant with the Greenbelt Plan, Growth Plan and Niagara Escarpment Plan. We envision a development around the Go Train where people get off the train and to their right is a natural Niagara woodlot, across the road is a working farm, perhaps with a stand at the road selling locally grown produce, including specialty crop produce. The lands that would become available on the north side of the QEW would continue to be developed as a complete community, including with community gardens and perhaps a partnership with the local garden club to teach locals how to grow a variety of vegetables. If these lands are redesignated, as they should be, they will be developed in a uniquely Niagara way.

As a local municipality, we constantly have our feet on the ground and are able to see and know our community and the lands upon which it sits in intricate detail. The comments contained within this letter are based on sound professional advice from our staff and agricultural consultant to the Panel and the Province based on our knowledge of our Town, its needs and its environment. It is clear that there is much good that has come from the Provincial Plans. It is equally clear, however, that there are certain changes that need to be looked at to ensure that all provincial goals and objectives are properly considered and that errors in mapping are corrected. I hope that you will seriously consider our comments and recommendations and I would extend a warm welcome to members of Ministries to Grimsby for a further tour of the community and provide an opportunity for the Town to describe, in more detail, the issues that we feel need to be considered and understood.

Thank you for your consideration,



Robert Bentley
Mayor – Town of Grimsby

APPENDIX A: GRIMSBY OFFICIAL PLAN (2012) LAND USE SCHEDULE

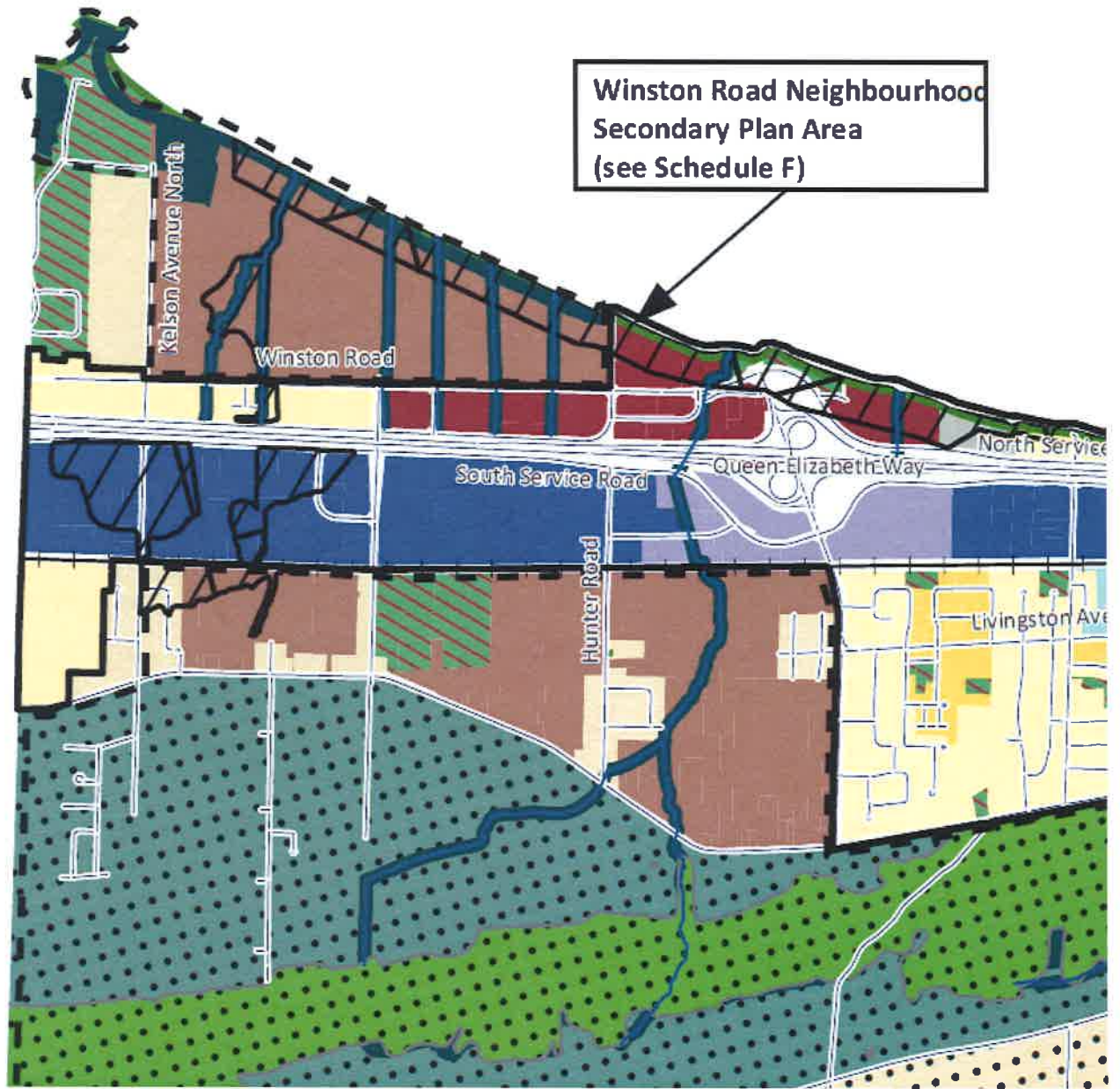
APPENDIX B: MAPS - GRIMSBY GREENBELT REQUEST

- Land uses – Current and under development (Grimsby)
- Requested Changes to Greenbelt Plan Designation (Grimsby)
- Requested Changes to Environmental Protection Areas based on Grimsby Official Plan mapping (Approved 2012).

APPENDIX C: SPECIALTY CROP GREENBELT STUDY REPORT FOR THE TOWN OF GRIMSBY
Prepared by AG Plan Limited, 2016 (Separate Attachment)

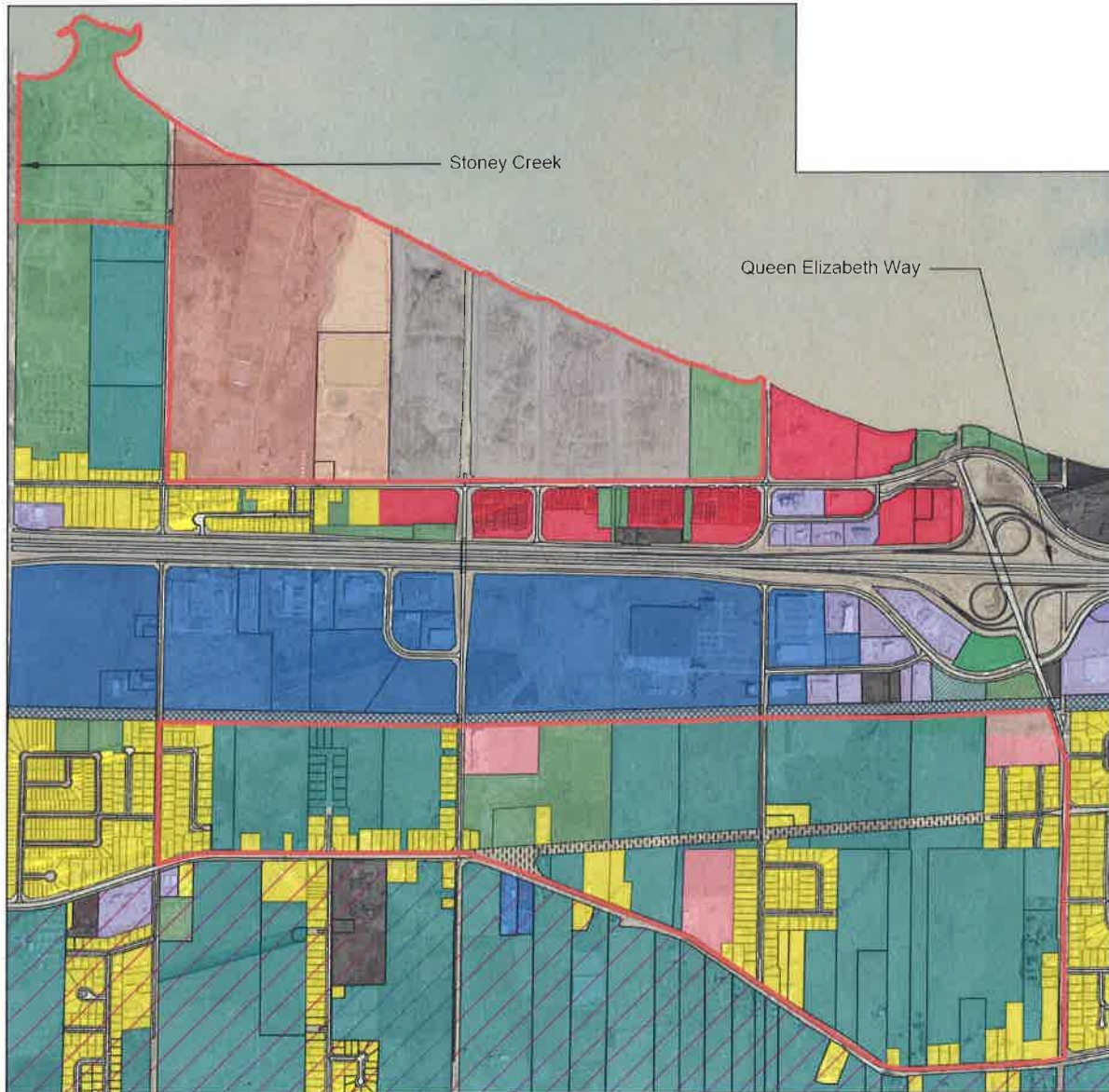
Legend

- +— CN Railway
- Streams
- Greenbelt Plan Area Boundary
- Urban Settlement Area Boundary
- Downtown District Boundary
- Hamlet Area Boundary
- Hazard Land Area (Ont. Reg. 155/06)
- Escarpment Natural Area
- Escarpment Protection Area
- Escarpment Rural Area
- Environmental Protection Area
- Environmental Conservation Area
- Low Density Residential Area
- Medium Density Residential Area
- High Density Residential Area
- Residential / Mixed Use Area
- Parks and Open Space
- Downtown - Main Street
- Downtown - Intensification
- Downtown - Transition
- Neighbourhood Commercial Area
- Marine Commercial Area
- Service Commercial Area
- Employment Area
- Institutional Area
- Utility Area
- Agricultural Area
- Rural Area
- Specialty Crop Area - Tender Fruit and Grape Lands



APPENDIX B: MAPS - GRIMSBY GREENBELT REQUEST

LAND USES (CURRENT OR UNDER DEVELOPMENT) WITHIN AND ABUTTING TENDER FRUIT & GRAPE LANDS IN GREENBELT PLAN, NORTH-WEST QUADRANT OF GRIMSBY, ONTARIO

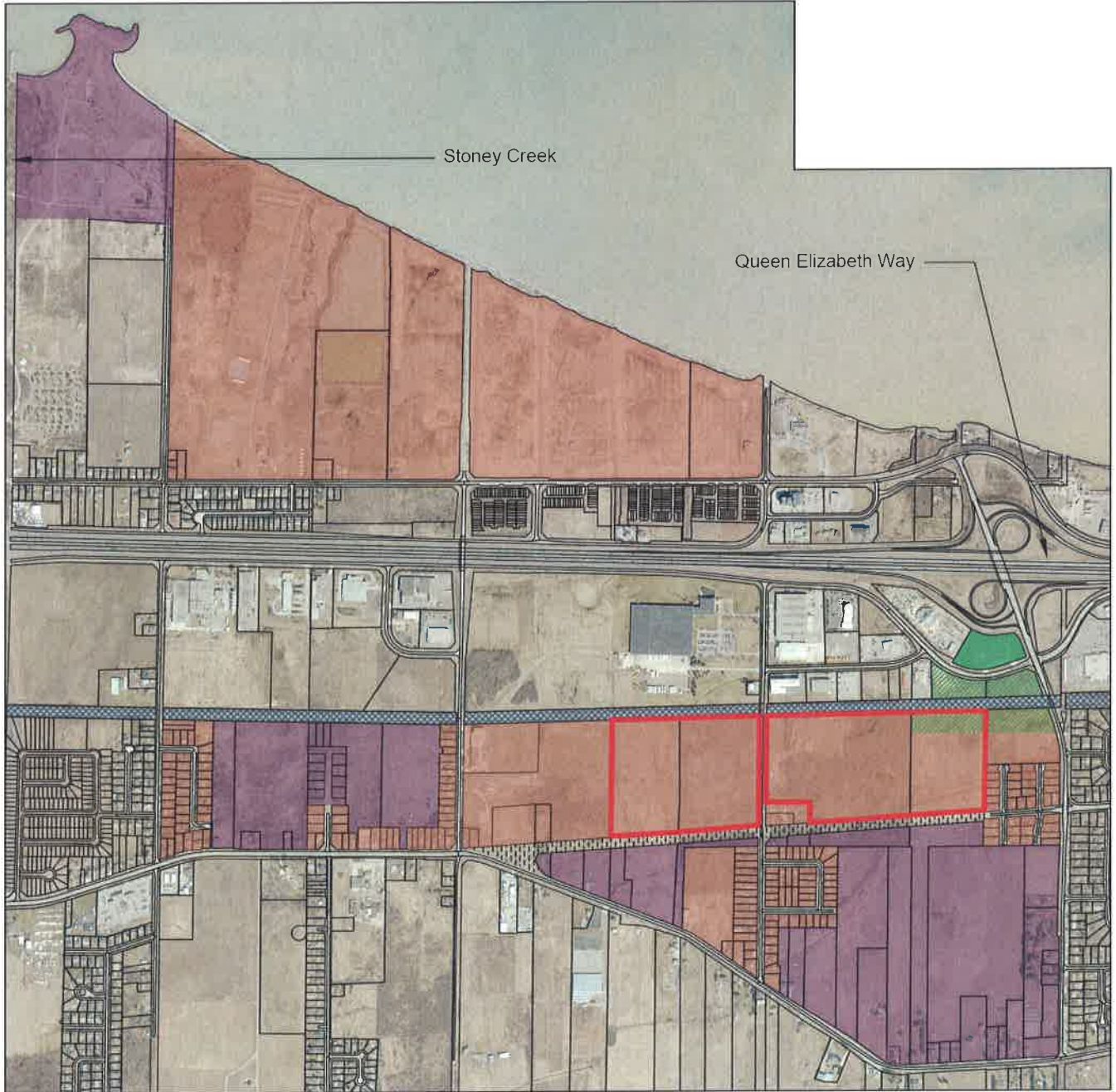


Legend	
	Tender Fruit & Grape Lands Boundary (Greenbelt Plan)
	Niagara Escarpment Plan Area Boundary (Niagara Escarpment Plan)
Current Land Use	
	Low Density Residential
	Medium & High Density Mixed-Use
	Employment Area
	Service Commercial
	Rural/Agricultural
	Parks & Open Space
	Institutional
	Radio Towers
	Government (Rifle Range)
	Former Sewage Treatment Plant (Bird Area)
	Existing GO Bus Station
	Expanded GO Station- EA Approved, Train 2021
	Serviced Unopened Regional Road Extension
	Vacant
	CN Rail








- Notes:
- a) Land use categories assigned based on use which occupies at minimum one-third of the total lot area
 - b) Land uses current as of February 27, 2017.



**REQUESTED CHANGES TO GREENBELT PLAN DESIGNATIONS,
NORTH-WEST QUADRANT OF GRIMSBY, ONTARIO**

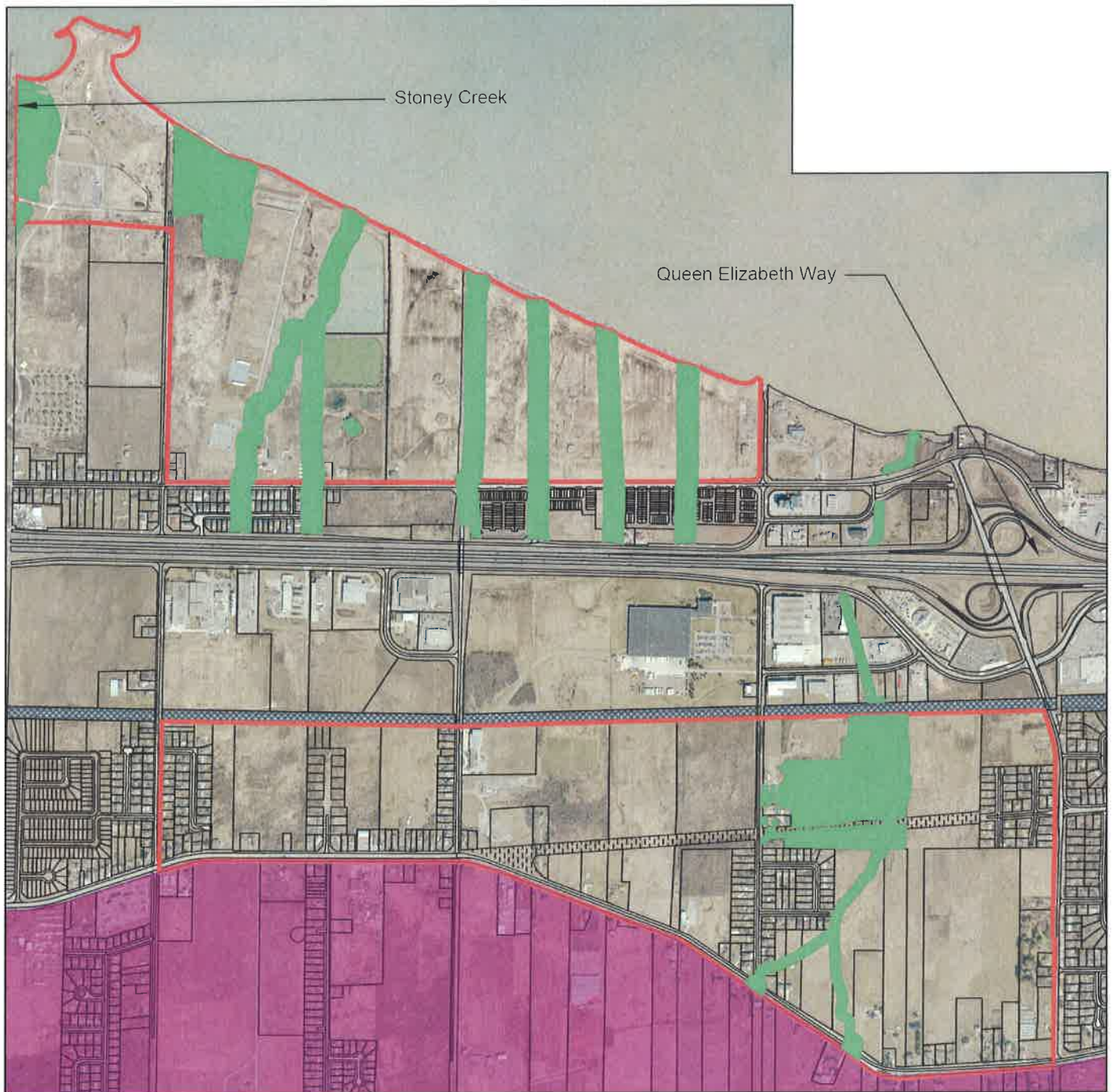


Legend

	Lands to remain Tender Fruit & Grape
	Lands requested to be re-designated Towns & Villages
	Existing GO Bus Station
	Expanded GO Station- EA Approved, Train 2021
	Serviced Unopened Regional Road Extension
	CN Rail
	Undeveloped Lands



**REQUESTED CHANGES TO ENVIRONMENTAL PROTECTION AREA DESIGNATIONS,
AS BASED ON SCHEDULE A OF THE TOWN OF GRIMSBY OFFICIAL PLAN, APPROVED IN 2012**



Legend	
	Environmental Protection Area (Schedule A, Town of Grimsby Official Plan)
	Tender Fruit & Grape Lands Boundary (Greenbelt Plan)
	Niagara Escarpment Plan Area (Niagara Escarpment Plan)
	Serviced Unopened Regional Road Extension
	CN Rail

