

March 19, 2026

Town of Grimsby
Planning and Development Services
Attn: Sawroop Sandhu, Planner
160 Livingston Avenue
Grimsby, ON L3M 0J5

Dear Ms. Sandhu,

**Re: 13 Mountain Street & 19-23 Elm Street
Official Plan and Zoning By-law Amendment Applications
File Nos. 26OP-16-2502 and 26Z-16-2505
Planning Justification Addendum Letter**

1.0 INTRODUCTION

As you are aware, we are the planning consultants to Woolverton Holdings Corporation, (the “Owner”) with respect to the property municipally known as 13 Mountain Street and 19, 21 and 23 Elm Street (the “subject site”). The subject site is located at the northeast corner of the intersection of Mountain Street and Elm Street, generally south of the Main Street commercial core in Grimsby’s Downtown District, and north of the Niagara Escarpment.

In May 2025, we prepared a Planning Justification Report in support of applications for Official Plan and Zoning By-law amendments to permit the redevelopment of the subject site with an 8-storey mixed-use building, which included the adaptive re-use of the existing, heritage-designated Woolverton House (13 Mountain Street) and Woolverton Hall (19 Elm Street) (the “May 2025 proposal”). The applications were submitted to the Town on May 23, 2025 and deemed complete on July 25, 2025. A statutory public meeting was held on September 17, 2025.

Through the Town’s review of the applications, feedback has been received from various Town and Regional departments, external commenting agencies and the public. The Owner has worked closely with Town staff to evolve the proposal in response to the comments received, while continuing to advance a built form that will positively contribute to the form and function of the Downtown while providing new residential units, retail space and publicly accessible outdoor spaces. On this basis, the proposal has been revised; most notably through a reduction in building height from 8-storeys to 7-storeys (the “revised proposal”). The revised proposal is described in greater detail in **Section 2** of this letter.

The purpose of this letter is to provide an overview of the revised proposal and the evolving policy framework and to provide additional analysis on the appropriateness of the revised proposal. This letter is intended to act as an addendum to our May 2025 Planning Justification Report and concludes that the revised proposal is consistent with the Provincial Planning Statement, conforms with the Niagara Escarpment Plan and the Niagara Regional Official Plan and generally conforms with the Town of Grimsby Official Plan. The revised proposal represents an appropriate scale and form of redevelopment that will support the ongoing vitality of Downtown Grimsby, while contributing to the diversification of housing options in the Town. Subject to additional comments set out in this letter, the findings and analysis set out in our May 2025 Planning Justification Report continue to be relevant and accurate.

2.0 DESCRIPTION OF REVISED PROPOSAL

The revised proposal continues to provide for a new mid-rise, mixed-use building supported by the integration and adaptive re-use of the existing heritage-designated Woolverton House and Woolverton Hall, as well as new ground floor retail uses and publicly accessible open spaces that will support ongoing public realm improvements throughout the Downtown. In response to comments received following the submission of the applications, the proposal has been revised to reflect a reduced height of 7-storeys, which is consistent with the height previously approved for the majority of the subject site (13 Mountain Street and 19-21 Elm Street). Notwithstanding this change, the proposal continues to provide for market and affordable rental dwelling units, new retail spaces, and high quality private and publicly-accessible spaces.

The key changes incorporated in the revised proposal are as follows:

- The overall building height has decreased from 8-storeys to 7-storeys with a measured height of 31.0 metres inclusive of the mechanical penthouse;
- An increased setback to Mountain Street for Levels 2 to 7 at the northwest corner has been provided (9.2 metres, whereas the May 2025 proposal was setback 7.7 metres in this location);
- The two rooftop placemaking signs previously proposed have been removed;
- The number of proposed rental residential units has decreased from 177 to 150, with associated adjustments to the proposed unit mix;
- Four additional parking spaces have been provided and, coupled with the reduced unit count, an increase in the residential parking rate has been achieved;
- The community hub spaces have been removed to accommodate additional indoor amenity space and an expansion to the internalized parking structure; and
- The overall amenity area provided in the revised proposal has increased from 363 square metres to 564 square metres.

Importantly, the revised proposal continues to provide significant community benefits, including the provision of 10% of the proposed dwelling units as affordable rental dwelling units and two publicly accessible plaza spaces (one along each frontage). The Owner would like to continue conversations with the Town regarding the consideration of these elements as satisfying all or part of the applicable Community Benefits Charge and parkland dedication requirements for the proposed development. We note that consideration of the proposed plaza spaces as fulfilling the required parkland dedication is provided through Grimsby Official Plan Policy 3.5.6.4 e) and the Town’s Parks, Recreation and Culture department has indicated that an openness to this consideration. The Owner will be further engaging the Town during the detailed design of the proposed plaza spaces through a future Site Plan Control application.

2.1 Statistical Comparison

Table 1 below provides a summary of key statistical changes between the May 2025 proposal and the revised proposal.

Table 1 – Summary Comparison of Development Statistics

Statistic	May 2025 Proposal	Revised Proposal March 2026
Gross Site Area	4,710 square metres	4,710 square metres
Road Widening	197 square metres	197 square metres
Net Site Area	4,513 square metres	4,513 square metres
Total Gross Floor Area	13,200 square metres	11,312 square metres
Residential GFA	12,472 square metres	11,033 square metres
Retail GFA	279 square metres	279 square metres
Community Hub GFA	449 square metres	
Building Height		
Storeys	8 storeys	7 storeys
Measured Height (Inc. MPH)	34 metres	31 metres
Floor Space Index	2.92	2.51
Lot Coverage (Net)	62%	62%
Total Dwelling Units	177 (100%)	150 (100%)
Studio	21 (12%)	15 (10%)
One Bedroom	24 (14%)	21 (14%)
Two Bedroom	102 (57%)	106 (71%)
Three Bedroom	30 (17%)	8 (5%)
Total Amenity Area	363 square metres	564 square metres
Indoor Amenity	173 square metres	374 square metres
Outdoor Amenity	190 square metres	190 square metres
Total Vehicle Parking Spaces	150 spaces	154 spaces
Resident	121 spaces	147 spaces
Non-Resident	29 spaces	7 spaces
Off-Site Non-Resident	18 spaces	23 spaces

Total Bicycle Parking Spaces	56 spaces	48 spaces
Resident	54 spaces	46 spaces
Non-Resident	2 spaces	2 spaces

3.0 EVOLVING POLICY CONTEXT

As noted above, the subject Official Plan Amendment and rezoning applications were submitted in May 2025. Since that time, while there have been amendments to the Planning Act brought about through Bill 17, the Protect Ontario by Building Faster and Smarter Act, 2025, which received Royal Assent on June 5, 2025, the policy and regulatory framework applicable to the subject site has remained relatively consistent.

However, as set out in Section 3.1 below, the Town has continued to progress their Official Plan Review since the applications were submitted, with a first draft of the new Official Plan being released in October 2025. In addition, in June 2025 Niagara Transit approved-in-principle a new master plan which includes new planned local transit service in Grimsby as well as new regional connections (see Section 3.2).

3.1 Grimsby Official Plan Review

The Town of Grimsby is currently undertaking an Official Plan Review project, with the ultimate goal of a new Official Plan to guide growth and development in the Town to 2051. The new Official Plan, once approved, will replace the current Official Plan which was adopted by Town Council in 2009 and approved by the Ontario Municipal Board in 2012, as well as the Niagara Regional Official Plan which became an official plan of the Town of Grimsby (and of other municipalities within Niagara Region) on March 31, 2025.

A first draft of the new Official Plan, entitled “Envision Grimsby”, was released to the public for comment in October 2025 (the “draft new Official Plan”). A statutory Open House and Public Meeting to consider the draft new Official Plan were held on February 12, 2026 and February 23, 2026 respectively. At these engagement events, Town staff noted that a revised draft is targeted to be released in April 2026, with a final draft brought to Council for consideration in June 2026. The draft new Official Plan will be subject to final approval through the Ministry of Municipal Affairs and Housing.

Although the draft new Official Plan has not yet been endorsed by Town Council or approved by the Ministry, we note that the current draft outlines the Town’s latest vision for future growth and development through to the 2051 planning horizon. As such, we have reviewed the draft new Official Plan as it relates to the revised proposal for the subject site and have identified the below key policies which are informative but not determinative with respect any future decision on the subject applications.

Schedule B – Town Structure of the draft new Official Plan identifies the subject site as being within the ‘Downtown District Area’ in the Town’s Urban Settlement Boundary, as well as the Niagara Escarpment Plan Area. Schedule C – Land Use locates the subject site within a ‘Strategic Growth Area’ and designates the site as *Mixed Use*, while Schedule C3 – Downtown District Character Areas designates the subject site as *Downtown Neighbourhood*.

The preamble of Section 2.2 in draft new Official Plan states that the Town is anticipated to reach a population of 51,100 people in 2051, which means the Town is anticipated to grow by approximately 19,500 people over the next 25 years, requiring approximately 9,500 dwelling units over this time frame. Among other guiding principles in Section 2.3, the new draft Official Plan identifies the need for land use planning decisions to balance the protection and enhancement of the natural environment with the intensification of Grimsby (2.3.1.1).

With respect to housing, Section 2.4.1 of the draft new Official Plan encourages a diversity of housing in support of a complete community. Specifically, Policy 2.4.1.4 targets a Town-wide minimum housing ratio of 20% multi-unit housing (apartments and mixed-use buildings) to 2051. In addition, through Policy 2.4.1.5 the Town seeks to facilitate the provision of affordable housing by promoting higher density housing forms in appropriate locations and encouraging a mix of unit sizes. Policy 2.4.1.6 states that the Town will target 30% of all new housing units constructed over the long term to consist of affordable housing units.

Section 3.1 of the draft new Official Plan provides the Town’s policies for lands located within the Urban Settlement Area. Policy 3.1.1.1 provides that the Downtown shall continue as Grimsby’s most prominent mixed use area and a central hub of vibrant activity and placemaking, providing a mix of residential and commercial uses, community facilities and parks and open spaces. Policy 3.1.1.4 states that reduced parking shall be considered in the Downtown to support a variety of built forms and increased pedestrian activity. Policy 3.1.1.7 provides that the Downtown shall be planned to have the highest concentration of commercial, and retail uses and the greatest variety of residential building forms and sizes.

As noted, the subject site is proposed to be designated *Mixed Use* on Schedule C. The *Mixed Use* designation policies are provided in Section 5.6 of the draft new Official Plan, which states that development in *Mixed Use* areas shall support sustainable transportation choices and contribute to the creation of complete communities. Scale, intensity and pace of development are to vary by location.

Policy 5.6.1 permits residential uses, retail and service commercial uses, hotels, motels, office uses, community facilities, public parks and urban squares, among others uses on lands designated *Mixed Use* areas. In addition, Policy 5.6.3 provides that new mixed-use

development is to support the Town's intensification objectives, and Policy 5.6.6 states that development in *Mixed Use* areas shall be designed to create compact, walkable environments with active ground-floor uses, particularly along arterial and collector roads. Policy 5.6.13 further directs that new development in the *Downtown Neighbourhood* per Schedule C3 should be provided in a mixed-use building.

Section 6.1.1 provides policy direction with respect to views, prominent sites, landmarks and gateways. With respect to the Niagara Escarpment, this section notes that Grimsby is unique to its location along the escarpment and that the Town has an opportunity to create a skyline that enhances the relationship with the escarpment. Policy 6.1.1.1 states that centres, which includes the Downtown, shall contribute to a distinctive skyline that integrates with the backdrop of the Niagara Escarpment. Policy 6.1.1.4 directs that prominent views from Lake Ontario to the Niagara Escarpment and from the Niagara Escarpment to Lake Ontario shall be protected and enhanced.

In Section 6.4.1 outlines a Public Realm and Built Form Framework for the Downtown Character Areas identified on Schedule C3. With respect to the *Downtown Neighbourhood* area, which includes the subject site, Policy 6.4.1.9 provides that a range of low-rise to medium-rise buildings shall be permitted with a minimum building height of six storeys for new development. It is noted that Policy 6.2.3 defines medium-rise development as buildings that are between four and 12 storeys in height.

Policy 6.4.1.10 states that, to achieve a building height above six storeys in the *Downtown Neighbourhood*, the following requirements shall be met:

- a. The building and site development shall enhance the public realm through the provision of items such as:
 - i. public art;
 - ii. publicly accessible amenity space;
 - iii. heritage protection, enhancement or commemoration;
 - iv. community facilities;
 - v. ground floor retail uses; and
 - vi. pedestrian pathway connections (excluding public sidewalks).
- b. Building design must include a two to four storey podium or a minimum three metre stepback at or between the second and sixth storey;
- c. Along the street, buildings shall include weather protection for pedestrians; and
- d. If parking is provided, the parking must be provided in a structure.

Section 7.3 provides policies with respect to the lands within the Town, including the subject site, that are located within the Niagara Escarpment Plan Area. While Policy 7.3.2 states that all new development in the Niagara Escarpment Plan Area requires a development permit from the Niagara Escarpment Commission, we note that this policy is

inconsistent with *the Niagara Escarpment Planning and Development Act, R.S.O. 1990, c. N.2* which differentiates between the Niagara Escarpment Planning area and the Niagara Escarpment Commission's development control area.

3.2 Niagara Transit Master Plan

On June 17, 2025, the Niagara Transit Commission Board approved the Transit Plan 10-Year Investment and Growth Strategy (2026-2035) in principle (the "NRT Master Plan"). The purpose of the NRT Master Plan is to improve transit services across Niagara Region over the next decade, which includes specific transit investments in the Town of Grimsby. Overall, the NRT Transit Plan contemplates an 84% increase in new vehicles with a 10-year capital budget of approximately \$890 million.

As part of Stage 1 the NRT Master Plan (2026-2027), Grimsby is anticipated to receive a new regional bus route connecting Grimsby to St. Catharines, including a connection to the Hamilton Street Railway ("HSR") network. In addition, two new microtransit hubs are planned, as well as service expansion from 6 a.m. to midnight, a Sunday service fixed route and increased availability of speciality services (i.e specialized and microtransit).

The expanded transit services contemplated for Grimsby in Stage 2 (2027-2030) include a new Regional Route connecting Grimsby through West Lincoln and Pelham with a connection to the HSR at Winona Crossing, along with two new local fixed routes, and increased service expansion hours. Stage 3 (2031-2035) includes a further new fixed route in Grimsby, service enhancements to an existing local fixed route into a 15-minute network, and some overnight service expansion.

4.0 PLANNING AND URBAN DESIGN ANALYSIS

In our opinion, the revised proposal continues to represent good planning and urban design, contributing to the ongoing function and planning vision for Downtown Grimsby and will contribute to sustaining the Downtown as a vibrant, mixed-use community. This letter should be read in conjunction with our May 2025 Planning Justification Report as the analysis and conclusions from that report remain relevant and applicable to the revised proposal.

4.1 Conformity with Niagara Escarpment Plan

The Niagara Escarpment Plan (the "NEP") derives its authority from the Niagara Escarpment Planning and Development Act. It was originally approved on June 12, 1985, and was subsequently revised through reviews in 1990, 1995 and most recently in 2017. The current version of the NEP came into effect on June 1, 2017 and the most recent office consolidation is dated April 1, 2025.

On NEP Map 1 – Niagara Region, the subject site designated as Urban Area. It is noted that while the subject site is within the NEP area, it is outside of the Niagara Escarpment Commission’s (“NEC”) Development Control area. The closest point of the NEC’s Development Control area is located approximately 200 metres to the southwest of the subject site.

The Urban Area designation of the subject site and the relevant policies of the NEP have not changed since the preparation of our May 2025 Planning Justification Report. However, through their review of the subject Official Plan amendment and rezoning applications, the NEC has requested additional analysis regarding the conformity of the proposed development with the NEP. On this basis, a detailed review of the applicable NEP policies has been completed and is included as **Appendix A** to this letter. A summary of our review is provided in this sub-section.

The purpose of the NEP is to provide for the maintenance of the Niagara Escarpment and lands in its vicinity substantially as a continuous natural environment and to ensure only such development occurs as is compatible with that natural environment. As set out in Section 1.7 of the NEP, the Urban Areas designation is meant to identify Urban Areas in which the Escarpment and closely related lands are located, with the objective of minimizing impact and preventing further encroachment of urban growth on to the Escarpment environment.

It is our opinion that the proposed development conforms to the policies of the NEP, including those policies related to the Urban Areas designation, climate change and energy efficiency, and the preservation of scenic resources. As a mid-rise, mixed-use infill development, the proposal represents an appropriately scaled, intensified form of development that is reflective of its urban, Downtown context, visually compatible with the Niagara Escarpment, will encourage reduced energy consumption and greenhouse gas emissions and will relieve development pressure on surrounding rural and less developed areas.

With respect to the policies of the NEP that encourage environmental sustainability and climate change resilience, it is our opinion that the revised proposal will inherently support these ambitions by encouraging a lifestyle that does not require daily use of a personal automobile, resulting in reduced greenhouse gas emissions and consumption of non-renewable resources. Furthermore, being located within the existing built-up area of the Town of Grimsby, redevelopment of the subject site will help to relieve residential development pressure on undeveloped greenfield lands. By making better use of existing urban infrastructure and services before introducing new ones, redevelopment of the subject site will help to reduce demands on nature and preserve high quality agricultural lands.

The revised proposal also incorporates specific design and functional elements to further support its sustainability efforts including: a reduced parking rate and the provision of bicycle parking spaces to encourage alternative modes of transportation; the retention and adaptive re-use of existing structures to reduce the embodied carbon demand of the proposal; and a simplified massing approach that will optimize operational and construction-related energy efficiency. The Owner is also considering further sustainability measures, including a geothermal mechanical system, which will be further explored through a future Site Plan Control application.

With respect to the preservation of Escarpment scenic resources, it is our opinion that the massing of the revised proposal is appropriate for its location and has been suitably sculpted to preserve views of the Escarpment and to ensure that the Escarpment remains the predominant feature of the Downtown Grimsby skyline. This careful massing is reflected in the revised draft Zoning By-law Amendment being submitted concurrently with this Addendum. Compared to the previously submitted draft Zoning By-law Amendment, the revised version utilizes a height and setback schedule to ensure consistency in the future interpretation and implementation of the proposed massing.

In order to evaluate the visual impact of the revised proposal onto views of the Escarpment, a scoped Visual Impact Assessment (dated March 18, 2026) has been prepared by Land Art Design. This Visual Impact Assessment was undertaken to evaluate the visual impact of the proposed development at specific viewpoints identified by the NEC. These viewpoints are located along Mountain/Christie Street at varying distances north of the subject site. As demonstrated in the Visual Impact Assessment, the proposed development will be visible along the Mountain/Christie Street corridor but will only partially impede views of the Niagara Escarpment ridgeline at the viewpoint closest to the subject site located at the intersection of Mountain Street and Main Street. Utilizing this viewpoint, the project team considered massing revisions along the Mountain Street frontage and evaluated these against the as-of-right massing previously approved for the majority of the subject site. The resulting massing of the revised proposal, which includes an increased setback to Mountain Street for Levels 2 through 7 at the northwest corner of the site, results in only a very minor increase in the area of the Escarpment ridgeline that is obscured by the proposed development compared to the as-of-right condition. It should be noted, although not included in the Visual Impact Assessment, if the viewpoint is shifted further south towards Elm Street, more of the ridgeline would be visible.

Overall, it is our opinion that the revised proposal represents an appropriate balancing of the preservation of Escarpment scenic resources, the preservation of on-site cultural heritage resources and the provision of much needed new, rental dwelling units, while conforming to the policies of the NEP. While the proposed development will be visible against the backdrop of the Escarpment, it will not detrimentally impact the Escarpment

environment and will only minorly impede views of the ridgeline from specific highly urbanized locations in the Downtown.

4.2 Intensification

In our opinion, the revised proposal supports the policy direction provided in the Provincial Planning Statement, the Region of Niagara Official Plan, and the Town of Grimsby Official Plan (the “Grimsby OP”), all of which promote intensification in strategic growth areas and on sites that are well served by municipal infrastructure. The proposed redevelopment will contribute to the Town and Region’s intensification targets with a mix of residential and non-residential uses that balances the need for growth with the applicable policies of the Greenbelt Plan and Niagara Escarpment Plan.

The subject site is an appropriate location for residential and mixed-use intensification as it is within a “strategic growth area” due to its location along a Regional Arterial Road (Mountain Street) and within Downtown Grimsby which is identified as a “Major Intensification Area” in the Grimsby OP. Furthermore, the draft new Official Plan identifies the subject site as being within a “strategic growth area” on Schedule C – Land Use. On this basis, the existing low rise buildings and surface parking areas on the subject site represent an underutilization of land. As one of a limited number of locations the town where intensified growth is not only expected but encouraged by the planning policy context, it is important that the use of the subject site be optimized through the proposed redevelopment.

Finally, it is noted that the overall scale of intensification contemplated in the revised proposal is generally similar to what was approved in 2024 for the majority of the subject site. It is our opinion that allowing a height of 7-storeys (and the resulting increased density) to apply across the expanded site is consistent with both good planning and will support the broader policy goals set out by the Province, Region and Town.

4.3 Land Use

The revised proposal continues to provide for a mix and range of housing options and at-grade commercial uses, which is appropriate and desirable in land use planning terms. The proposed residential uses are desirable given the Town’s anticipated housing needs and the subject site’s location in a highly walkable urban area and the proposed commercial uses are compatible with the existing mixed-use context of the Downtown. Both the residential and non-residential uses will support the long-term vitality and vision for the Downtown.

The proposed land uses are permitted by both the in-force Grimsby OP and the draft new Official Plan. In this respect, it is noted that the draft new Official Plan proposes to

designate the subject site as *Mixed Use* on Schedule C, and identifies it as being within the Downtown Neighbourhood Character Area on Schedule C3. Draft Policy 5.6.1 permits a variety of residential and non-residential uses on lands designated *Mixed Use* areas, and draft Policy 5.6.13 directs new development on lands designated *Downtown Neighbourhood* to be provided in a mixed-use building.

The draft new Official Plan emphasizes that the Town of Grimsby is anticipated to grow by approximately 19,500 people over the next 25 years, requiring approximately 9,500 new dwelling units over this time frame. In this context, draft Policy 3.1.1.7 specifically identifies the Downtown as being planned to have the highest concentration of commercial and retail uses and the greatest variety of residential building forms and sizes. The revised proposal would support the Town in meeting its anticipated housing needs and would provide for a diversification of housing options in the Downtown. Furthermore, by supporting residential growth in Downtown Grimsby, the proposal will support the continued success of the Downtown by providing opportunities for future residents to use active transportation to access surrounding commercial uses and publicly accessible spaces.

In terms of housing options, the revised proposal continues to provide new purpose-built rental housing with a mix of unit sizes. The revised proposal will create a total of 150 dwelling units, including 15 studio units (10%), 21 one-bedroom units (14%), 106 two-bedroom units (71%) and 8 three-bedroom units (5%). Of these, the Owner intends to provide 10% (or 15 units) as affordable units which will be leased through a non-profit affordable housing provider.

Finally, with respect to the proposed change in land use from the current non-residential uses to the proposed mixed-use building which includes residential, it is acknowledged that a future Record of Site Condition (“RSC”) will be required. On this basis, Phase One and Phase Two Environmental Site Assessments (“ESA”) have been completed for the subject site and were submitted as part of the May 2025 initial submission of the applications. The Phase Two ESA identified exceedances of the applicable Table 2 Site Condition Standards (“SCS”) for various metals, hydride-forming metals and mercury within the fill stratum at depths ranging between 0 to 2.9 metres below grade. Electrical Conductivity and Sodium Adsorption Ratio impacts (from de-icing activities) were identified in soil; however, these were considered to be exempt per Section 49(1).1 of Ontario Regulation 153/04. Native soils underlying the fill were found to meet the applicable standards for residential property use. Groundwater samples met the Table 2 SCS with the exception of sodium and chloride, which were also considered exempt.

The project environmental consultant anticipates that a majority of the impacted fill material will be removed during site excavation associated with the proposed development. Following excavation, verification sampling will be undertaken to confirm

that the remaining soils meet the applicable standards. If there are areas in which the fill material will not be removed, it can be managed in place through the completion of a Risk Assessment (“RA”) and implementation of Risk Management Measures. The RSC will be filed on the Environmental Site Registry following removal of the impacted soil and verification sampling and/or the acceptance of an RA and Certificate of Property Use by the Ontario Ministry of Environment, Conservation and Parks. A Letter of Reliance to the Town and Region which permits reliance on the findings of the previously submitted Phase One and Phase Two ESAs has been included in the resubmission package.

4.4 Height, Massing & Density

As previously noted, the most significant change to the revised proposal when compared to the May 2025 proposal is the reduction in overall building height from 8-storeys to 7-storeys. In terms of measured height, the revised proposal has a height of 26.7 metres to the top of the main roof and 31 metres to the top of mechanical penthouse. As a result of this change, the height of the revised proposal is generally consistent with the height previously approved for the majority of the subject site (7-storeys or 26 metres excluding the mechanical penthouse). It is our opinion that the proposed height is reasonable and appropriate given the site’s location, context, relationship with surrounding land uses and on-site cultural heritage resources.

Grimsby OP Policy 3.5.5.8 permits heights of up to 6-storeys in the *Downtown-Intensification* designation subject to the undertaking of a visual impact assessment that demonstrates that views of the Escarpment are not detrimentally impacted. As outlined in further detail in **Section 4.1** and **Appendix A** of this letter, a new, scoped Visual Impact Assessment has been completed for the revised proposal and is included in the resubmission package.

The draft new Official Plan Policy 6.4.1.9 provides that a range of low-rise to medium-rise buildings shall be permitted with a minimum building height of six storeys for new development in the *Downtown Neighbourhood* area. It is noted that draft Policy 6.2.3 defines medium-rise development as buildings that are between four and 12 storeys in height. As such, the revised proposal is within the range of height envisioned for new medium-rise development in the Downtown.

In consideration of the draft new Official Plan Policy 6.4.1.10, which sets out criteria for buildings with heights above six storeys, the revised proposal:

- enhances the public realm through the provision publicly accessible amenity space, the protection and enhancement of cultural heritage resources, and the provision of ground floor retail uses;

- incorporates a 3.5 metre setback above Level 3 along the Elm Street frontage and is generously set back along the Mountain Street frontage;
- includes canopies along both streets to enhance pedestrian comfort; and
- provides all parking within an integrated parking structure.

In terms of massing, the revised proposal continues to contextually address both street frontages and the existing on-site heritage designated buildings, while establishing the mid-rise character envisioned for the Downtown. Aside from the height reduction noted above, the massing of the revised proposal is generally consistent with the May 2025 proposal, with one key exception. At the northwest corner of the building an increased setback to Mountain Street for Levels 2 to 7 has been provided (9.2 metres whereas 7.7 metres was previously proposed). This increased setback was incorporated as a result of analysis undertaken as part of the updated Visual Impact Assessment, to maximize views of the Escarpment ridgeline when viewed from the intersection of Mountain Street and Main Street.

The revised proposal has a density of 2.51 net FSI which is a slight reduction from the 2.92 net FSI of the May 2025 proposal. As noted in Section 4.2, the optimization of density on the subject site is appropriate in consideration of the proposed built form design, site context and planned and existing urban structure. Furthermore, it is noted that neither the Grimsby OP nor the draft new Official Plan provide density limitations within the Downtown. As such, it is our opinion that the proposed density is appropriate and reasonable for the redevelopment of the subject site.

4.5 Built Form Impacts

From a built form perspective, the revised proposal is not expected to result in any unacceptable built form impacts onto surrounding properties, the adjacent public realm or within the subject site itself. The design and massing of the revised proposal, including the overall height, building setbacks and setbacks, have been illustrated on a zoning diagram included within the draft Zoning By-law Amendment included in the resubmission package. To ensure built form impacts are minimal and acceptable within an urban context, the zoning diagram has been provided to clearly delineate the proposed stepping of heights and separation distances to adjacent properties.

As part of the Town's circulation of the applications, we received comments from the representative of the landowner to the immediate east of the subject site (25 Elm Street). These comments related to the scale of the proposed building, the provided separation distances, wind impacts, and the sufficiency of vehicle and bicycle parking. The transportation related matter has been addressed in the Transportation Comment Response Letter (dated March 19, 2026) prepared by BA Group and included in the

resubmission package. In response to the remaining comments, we have noted the following:

- As discussed above, the overall building height of 7-storeys is an appropriate height that aligns with the Town's vision for medium-rise development between four and 12 storeys in height in this area of the Downtown.
- The revised proposal incorporates a minimum ground floor setback to the east property line abutting 25 Elm Street of 2.0 metres, which is consistent with the minimum interior side yard setback required in the Town's Zoning By-law 14-45. Furthermore, along this property line a stepback between 2.2 and 4.2 metres is provided above Level 3.
- To ensure adequate separation between windows, it can be assumed that similar setbacks and stepbacks to those provided would be required if 25 Elm Street were to redevelop. This would result in a separation distance between 8.4 and 12.4 metres between facing windows above Level 3, which would be adequate for light access and privacy purposes.
- The Pedestrian Level Wind Study included in the May 2025 submission was prepared in November 2025 and based on a 10-storey massing concept which was being considered at that time. Compared to the 10-storey concept, the revised proposal incorporates greater setbacks and stepbacks along the east and south facades of the building, as well as lower building heights. While an updated Pedestrian Level Wind Study has not yet been undertaken for the revised proposal, in our experience the massing differences between the revised proposal and the 10-storey concept will likely result in improved wind conditions on the adjacent public sidewalk and building entrances for 25 Elm Street.

5.0 CONCLUSION

In our opinion, the revised proposal is in keeping with the planning and urban design framework established by the applicable planning documents, specifically the Provincial Planning Statement, the Niagara Region Official Plan, and the Town of Grimsby Secondary Plan. The proposed residential, commercial and publicly accessible open spaces contemplated in the revised proposal will contribute to the ongoing evolution, vitality and growth of Downtown Grimsby. Ultimately, the revised proposal will result in an appropriate and desirable mixed-use intensification that adaptively reuses existing heritage designated buildings on an underutilized site.

Accordingly, our analysis and conclusions provided in our May 2025 Planning Justification Report remain relevant and applicable to the revised proposal, subject to the additional comments set out in this letter. It is our opinion that the revised proposal is appropriate and desirable for the subject site, and we recommend approval of the proposed Official Plan and Zoning By-law Amendment applications.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned or Celina Hevesi of our office.

Sincerely,
Bousfields Inc.

A handwritten signature in black ink, appearing to read "A. Chewter". The signature is fluid and cursive, with a large initial "A" and a long, sweeping tail.

Allison Chewter
Senior Associate



APPENDIX A:

Niagara Escarpment Plan Policy Review

NIAGARA ESCARPMENT PLAN POLICY REVIEW

Policy Number	Policy Text	Response
Part 1.7 (Urban Area)		
Policy 1.7.5.1	All development shall be of an urban design compatible with the scenic resources of the Escarpment. Where appropriate, provision for maximum heights, adequate setbacks and screening are required to minimize the visual impact of urban development.	<p>In our opinion, the massing of the revised proposal is compatible of the scenic resources of the Escarpment, including the nearby landform features. With a reduced height of 7-storeys (plus mechanical penthouse), and appropriate setbacks and stepbacks, the revised proposal has been designed to balance views of the Escarpment, the preservation of on-site cultural heritage resources and the provision of much needed new, rental dwelling units.</p> <p>As demonstrated in the scoped Visual Impact Assessment for the revised proposal completed by Land Art Design, the visual impact of the proposed development has been appropriately minimized, with consideration for the site’s urban context and the planned intensification of lands in Downtown Grimsby.</p>
Policy 1.7.5.2	Development within Urban Areas should encourage reduced energy consumption, improved air quality, reduced greenhouse gas emissions (consistent with provincial reduction targets to 2030 and 2050) and work towards the long-term goal of low carbon communities, including net-zero communities and	As a mid-rise, mixed-use building located in an urban context within the existing built-up area of the Town of Grimsby, the revised proposal will inherently support the sustainability ambitions of Policy 1.7.5.2 by encouraging a lifestyle that does not require

	<p>increased resilience to climate change, including through maximizing opportunities for the use of green infrastructure and appropriate low impact development.</p>	<p>daily use of a personal automobile and by relieving development pressure on surrounding rural and less developed areas.</p> <p>The proposal supports the use of alternative modes of transportation, and thereby reduced greenhouse gas emissions, through the provision of bicycle parking spaces for future tenants. While public transit service in Downtown Grimsby is currently limited, significant transit expansion is planned for the area, including both regional transit (including GO Train and Niagara Transit bus service) and local transit service.</p> <p>In addition, the proposed development accommodates for the retention and adaptive re-use of the existing heritage designated buildings on the site, which will help to reduce the embodied carbon demand of the proposed development.</p> <p>Finally, green roofs and other stormwater management low impact development best management practices are being explored for the proposal. Consideration for a geothermal mechanical system is also currently being studied by the Owner. These elements will be</p>
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		further examined as part of a future Site Plan Control application.
Policy 1.7.5.3	The co-location of compatible public services should be promoted to address local community needs in convenient locations that are accessible by walking, cycling and public transit, where available.	The proposed development does not include any specific public service component. The previously contemplated “community hub” has been removed from the revised proposal following discussions with Town staff. Notwithstanding, it is noted that the subject site is highly walkable and located in an area with a variety of existing community services and amenities. A new local public transit service is planned for Grimsby, with service in Downtown Grimsby, as part of Niagara Transit’s 2025 Master Plan.
Part 2.2 (General Development Criteria)		
Policy 2.21	The Escarpment environment shall be protected, restored and where possible enhanced for the long term having regard to single, multiple or successive development that have occurred or are likely to occur.	The proposed development will not detrimentally impact the Escarpment environment, which includes scenic resources associated with the Escarpment landscape. While the proposal will be visible from various locations throughout Grimsby, in the majority of these locations the visual impact onto views of the Escarpment is minimal. Where views are more significantly impacted, it is our opinion that these impacts are appropriate in consideration of the site’s urban context.

<p>Policy 2.2.6</p>	<p>Any development permitted should be designed and located in such a manner as to promote design and orientation that:</p> <ul style="list-style-type: none"> (a) maximizes energy efficiency and conservation and considers the mitigating effects of vegetation; (b) maximizes opportunities for the use of renewable energy systems and alternative energy systems; and (c) reduces greenhouse gas emissions so that the development is contributing to the goal of low-carbon communities and net-zero communities in Minor Urban Centres, Urban Areas, and Escarpment Recreation Areas 	<p>As noted in the response to Policy 1.7.5.2, the proposal has been designed with regard to environmental sustainability metrics. In addition to the matters addressed in that response, we note that the proposed built form has been designed to optimize energy efficiency which is a significant consideration for a future rental residential building. The consideration of a geothermal mechanical system is currently being studied by the Owner.</p> <p>While renewable energy systems are not specifically contemplated as part of the revised proposal, by contributing to an increased population density in the Downtown the proposal would contribute to the potential future viability of community-wide renewable/alternative energy systems.</p> <p>Finally, as noted previously the proposal will support the reduction in greenhouse gas emissions through adaptive re-use of heritage buildings, and by providing an option for a lower-carbon lifestyle in a highly walkable community.</p>
<p>Policy 2.2.8</p>	<p>Development permitted should be designed and located in such a manner as to provide for or protect</p>	<p>The revised proposal will not impede access to the Niagara Escarpment, including the Bruce Trail corridor. Rather, future residents</p>

	access to the Niagara Escarpment, including the Bruce Trail corridor.	of the proposed development will benefit from being within easy walking distance of the Escarpment and Bruce Trail.
Policy 2.2.12	<p>The following additional provisions apply to signs where permitted as an accessory use and billboards where permitted as a principal use:</p> <ul style="list-style-type: none"> (a) a sign may be permitted where the sign and its information is accessory to the existing principal use located on the same lot (e.g., home occupation or home industry, agriculture-related use, etc.); (b) signs and billboards shall not alter the natural features or cultural heritage landscape of the property and shall be compatible with the local topography, surrounding scenic resources and rural or residential community; (c) signs and billboards shall have minimal negative impact on the Escarpment environment through compatible design, materials, colour, siting and landscaping; (d) billboards are not permitted on prominent Escarpment slopes or in places where such billboards would obstruct views associated with prominent Escarpment slopes; (e) illumination of signs and billboards is discouraged and, where permitted, shall be subdued (e.g., shielded, downward directional, not internally lit); 	The previously proposed rooftop destination signage has been removed from the revised proposal. As such Policy 2.2.12 is no longer applicable in the review of the revised proposal.

	<p>(f) signs shall be limited to one per lot and shall not exceed 0.9 square metres, unless it can be demonstrated that a larger sign or an additional sign would have minimal negative impact on the Escarpment environment;</p> <p>(g) roof signs, signs attached to towers or other similar structures, animated or automated signs, and signs affixed to trucks and trailers adjacent to roads are not permitted; and</p> <p>(h) municipal official plan policies and standards respecting signs and billboards must be met, including any municipal sign by-laws.</p> <p>(i) with the exception of subsection h), the above restrictions do not apply to the following signs or billboards:</p> <ul style="list-style-type: none"> i. election signs; ii. temporary real estate signs advertising the sale of the property on which they are located; iii. temporary construction site signs; iv. no trespassing or warning signs; and iv. signs approved, sponsored or required by a public body. 	
Part 2.13 (Scenic Resources and Landform Conservation)		
Policy 2.13.1	Development shall ensure the protection of the scenic resources of the Escarpment.	The proposed development has been revised in response to earlier comments from the NEC in order to better ensure the protection of the scenic resources of the Escarpment as

		directed by Policy 2.13.1. As noted below, a scoped Visual Impact Assessment has been undertaken, which demonstrates that while the proposal will be visible from the identified viewpoints along Mountain/Christie Street, the Niagara Escarpment will remain the predominant feature of the Downtown Grimsby skyline.
Policy 2.13.2	Where a visual impact on the scenic resources is identified as a concern by the implementing authority, a visual impact assessment shall be required.	A scoped Visual Impact Assessment for the proposed development has been completed by Land Art Design (dated March 18, 2026).
Policy 2.13.3	<p>A visual impact assessment shall:</p> <ul style="list-style-type: none"> (a) establish a baseline for the existing conditions; (b) identify the proposed physical changes; and (c) assess the impact of the proposed change on the scenic resources of the Escarpment; and (d) propose measures to minimize any visual impacts. 	<p>The scoped Visual Impact Assessment referenced in our response to Policy 2.13.2 has been prepared in accordance with the considerations outlined in Policy 2.13.3.</p> <p>The scoped Visual Impact Assessment does identify one location (viewpoint 13) where a greater level of visual impact is anticipated. At this location, the project team has explored massing changes, including an increased setback to Mountain Street to reduce this impact. The draft Zoning By-law Amendment included in the resubmission package reflects this massing change.</p>
Policy 2.13.4	Appropriate siting and design measures shall be used to minimize the impact of development on the scenic resources of the Escarpment, including:	The proposed development, as revised, has been designed with regard to the siting and design measures outlined in Policy 2.13.4 to

	<ul style="list-style-type: none"> (a) establishing appropriate setbacks and maximum building heights; (b) changing the orientation and height of built form to reduce visibility and skylining; (c) clustering buildings where appropriate; (d) minimizing the development footprint and changes to the existing topography and vegetation; (e) using natural topography and vegetation as screening for visual mitigation; (f) where there is minimal existing screening or vegetation that cannot be retained, providing new planting of native species to screen development; (g) using non-reflective materials on roofs and walls along with measures to reduce reflectivity associated with windows; and (h) minimizing the effect from exterior lighting (e.g., lighting directed downward). 	<p>minimize its impact on the scenic resources of the Escarpment. Specifically, the proposal:</p> <ul style="list-style-type: none"> - incorporates generous setbacks to Mountain Street, including stepbacks above the ground floor; - provides for a maximum building height of 7-storeys or 31 metres (including mechanical penthouse) which is reflective of a moderate mid-rise development; - has been revised to reduce the overall proposed height and to remove rooftop signage elements that were identified as problematic by the NEC; - will support the planned evolution of the Downtown Grimsby skyline, while still allowing the Escarpment backdrop to remain generally visible throughout the town. <p>As part of a future Site Plan Control application, materiality of the proposed development and exterior lighting will be further explored with consideration Policy 2.13.4.</p>
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