



December 4, 2022

Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th floor  
Toronto, Ontario, M7A 2J3

To whom it may concern:

**Re: Niagara Peninsula Conservation Authority (NPCA) Comments  
Proposed Amendments to the Greenbelt Plan  
Proposed Amendments to the Greenbelt Area Boundary Regulation  
ERO Postings #019-6216 and 019-6217**

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The Province is proposing to remove approximately 7400 acres of land from within the Greenbelt Plan Area and add approximately 9400 acres of land to the Greenbelt Plan Area located in the Paris Galt Moraine. There are two areas identified for removal (one in the City of Hamilton and the other in the Town of Grimsby) and one area for redesignation (in the Town of Grimsby) within the NPCA's watershed. In principle, the NPCA discourages removal of environmentally sensitive and agricultural lands from the Greenbelt Plan Area that meet the criteria for designation in the Greenbelt Plan. NPCA staff acknowledges that the Greenbelt Plan is implemented by our watershed municipalities who need to consider factors other than environmental (e.g. availability of existing servicing, transportation network, existing land uses, previous municipal planning decisions, etc.) when assessing whether the proposed Greenbelt Plan Area boundary amendments are appropriate.

The NPCA previously recommended in its letter of April 19<sup>th</sup> 2021, in response to earlier Environmental Registry of Ontario Posting 019-3136, that consideration be given to extending the Greenbelt Natural Heritage System along the Welland River Valley and Twenty Mile Creek Valley. These two systems have their headwaters in the Greenbelt and are significant, both hydrologically and in a natural heritage context. In the case of Twenty Mile Creek, the lower reach is also part of the Greenbelt Natural Heritage System. Incorporating both watercourses into the Greenbelt Natural Heritage System would help in protecting these important systems. The NPCA continues to recommend environmental enhancements, setbacks, and buffers along Lake Ontario shoreline and watercourses (specially the headwaters and riparian zones of river systems for habitat protection and hazard mitigation).

The NPCA offers the following comments for the Province's consideration, which highlight NPCA regulatory and policy interests associated with the three properties located within our watershed jurisdiction. Our comments are focused on identifying the technical constraints related to natural environment, natural heritage, and Drinking Water Source Protection that must be fully considered in making key decisions on these lands.

#### Town of Grimsby

There is one area for removal in the Town of Grimsby. The lands are located in the Town's west end, north of Main Street West between Oakes Road, and Kelson Avenue and south of the CN Rail line. There is one mapped NPCA-regulated watercourse and associated 100 Year Flood Plain. NPCA staff note that there may be unmapped and unevaluated regulated features within these lands. There are also portions of these lands that are within the Intake Protection Zone 2 (IPZ 2) of the Niagara Source Water Protection Plan.

There is another parcel of land on the west side of Hunter Road and abutting the Lake Ontario shoreline that is proposed to be redesignated from Greenbelt Natural Heritage System to Towns/Villages. The main NPCA-regulated feature affecting this property is the Lake Ontario Shoreline and associated lakeshore floodplain and erosion limit hazards. There is also a small portion of this property located within the IPZ 2.

#### City of Hamilton

The one area within the NPCA's watershed in the City of Hamilton is located east of Upper James Street, south of White Church Road East and west of Ferris Road. The lands in question contain several small watercourses that are part of the headwaters of the Welland River.

#### Planning Process

For any of the lands identified, detailed planning work will need to be completed to identify environmental constraints, identify servicing options (including appropriate recommendations for source water protection) and feasibility and identify the appropriate land uses categories for the subject lands before individual development applications can be made. It is through such work that any environmental constraints and natural hazards would be identified and appropriately designated in municipal planning documents. This work takes time to complete properly. The NPCA is concerned that the one year timeframe proposed by the Province to complete this work and have land use plans in place does not provide sufficient time to properly complete the necessary studies and may not help achieve the desired goals of fast tracking attainable housing.

The NPCA is committed to working with the Province and our municipal partners to ensure an efficient planning review process while ensuring appropriate protection of the natural environment.

Sincerely,



David Deluce, MCIP, RPP  
Senior Manager, Environmental Planning & Policy

Encl.

cc: NPCA Board of Directors  
City of Hamilton  
Town of Grimsby  
Region of Niagara