

April 21, 2022

Attn: Growingthegreenbelt@ontario.ca

Dear Sir / Madam,

**Re: Comments from the City of Hamilton – Proposed Amendments to the Greenbelt Plan: Growing the Size of the Greenbelt – ERO Postings #019-4485, 019-4483, and 019-4803**

Thank you for the opportunity to provide comments on the following ERO Postings:

- ERO Posting #019-4485: Proposed Amendment to the Greenbelt Plan - Growing the Size of the Greenbelt;
- ERO Posting #019-4483: Proposed Amendment to the Greenbelt Area Boundary Regulation - Growing the Size of the Greenbelt; and,
- ERO Posting #019-4803: Ideas for Adding More Urban River Valleys.

City of Hamilton staff have reviewed the postings and supporting documents and have prepared the comments below.

ERO Postings #019-4485 & 019-4483: Proposed Amendment to the Greenbelt Plan - Growing the Size of the Greenbelt

*Context:*

The purpose of the proposed amendments is to add a number of Urban River Valleys to the Greenbelt Plan. Urban River Valley (URV) is a designation within the Greenbelt Plan. URVs connect the Greenbelt to the Great Lakes and inland lakes through urban areas that are not part of the Greenbelt Plan. The lands in this designation comprise river valleys and associated lands and are generally characterized by being:

- lands containing natural and hydrologic features, including coastal *wetlands*
- lands designated in official plans for uses such as parks, open space, recreation, conservation and environmental protection

Staff note that the policies of the Greenbelt Plan specify the following in relation to URVs:

“For lands falling within the Urban River Valley, the following policies shall apply:

1. Only publicly owned lands are subject to the policies of the Urban River Valley designation. Any privately owned lands within the boundary of the Urban River Valley area are not subject to the policies of this designation. For the purposes of this section, publicly owned lands means lands in the ownership of the Province, a municipality or a local board, including a conservation authority.
2. The lands are governed by the applicable official plan policies provided they have regard to the objectives of the Greenbelt Plan."

*City of Hamilton implications:*

Within the City of Hamilton, the effect of the proposals is to add Stoney Creek and Battlefield Creek to the Greenbelt Plan as URVs. Fifty Creek has already been added to the Greenbelt Plan as a URV through the Co-ordinated Provincial Plan Review.

*City of Hamilton history:*

Staff note that the City has previously provided comments on the URV designation in 2015 through the Co-ordinated Provincial Plan Review, and in 2021 through Phase One of the Growing the Greenbelt Consultation (ERO Posting 019-3136), as summarized below:

- Based on extensive review in 2015 as part of the City's Greenbelt Plan Boundary Review, which included a focus on the URVs, staff recommend that no additional URVs be added to the Greenbelt Plan (other than to reiterate two previous Council requests to add Coldwater Creek in Dundas, further discussed in relation to ERO Posting 019-4803 below). It was noted that the URVs have an extensive amount of existing natural heritage system protection based on a combination of public ownership, inclusion within the Niagara Escarpment Plan, being regulated by the Conservation Authorities, designated Open Space in the Urban Hamilton Official Plan and zoned as Open space. An additional layer of planning policy would not enhance the existing protection. This recommendation was submitted to the Province as part of the City's submission on the Co-ordinated Provincial Plan Review.

With the release of the Greenbelt Plan 2017, Coldwater Creek was not added as a URV. Within Hamilton, Fifty Creek was added as a URV.

- In 2021, the Province requested comments on addition of URVs to the Greenbelt Plan through the Growing the Greenbelt consultation (ERO 019-3136). City comments provided to the Province in April 2021 reiterated the recommendation to add Coldwater Creek to the Plan as a URV. No other URVs were recommended for addition at that time.

*Current Recommendation:*

While staff reiterate previous comments that the lands are already protected by a combination of Official Plan policy and zoning and Conservation Authority regulations, staff note that both Stoney Creek and Battlefield Creek have extensive areas of public ownership and provide connection to the Escarpment, which then provides connection to the Greenbelt. The boundaries of the URVs are generally based on a 60 m setback from the water's edge, providing for protection of the natural environment surrounding the urban rivers, including the urban forest.

The addition of Urban River Valleys to the Greenbelt Plan aligns with the Hamilton's High Impact Climate Change Goals by protecting and enhancing the natural environment, as well as the City's climate adaptation goal, as the natural environment can play a key role in reduction and protection from climate change impacts. [ICLEI Canada's Climate Science Report for the City of Hamilton](#) states "On a seasonal basis, in Hamilton, spring, winter and autumn precipitation accumulations are projected to increase by the end of the century with spring and winter experiencing the greatest increases." Protection of river valleys is vitally important to address the impacts of a changing climate by providing stormwater management and flood protection to protect citizens, agricultural land and infrastructure, and the natural environment. Staff therefore support the inclusion of Stoney Creek and Battlefield Creek as URVs in the Greenbelt Plan.

ERO Posting #019-4803: Ideas for Adding More Urban River Valleys

*Recommendation:*

As noted above, the City previously provided a recommendation to add Coldwater Creek (also known as Ancaster Creek) to the Greenbelt Plan as a URV. This recommendation was first put forward as part of the Co-ordinated Review in 2015 and followed up in 2021 as part of the Growing the Greenbelt Phase One consultation. Through ERO Posting 019-4803, staff reiterate the recommendation to add Coldwater Creek to the Greenbelt Plan as a URV.

Please accept these comments to meet the April 23, 2022 Provincial deadline for the submission of comments on the ERO Postings. Please note that additional comments may be forthcoming following Council consideration of the above comments. If you have any questions, please feel free to contact Heather Travis at (905) 546-2424, ext. 4168, or by email at [Heather.Travis@hamilton.ca](mailto:Heather.Travis@hamilton.ca).

Yours truly,

Steve Robichaud  
Director of Planning and Chief Planner  
Planning and Economic Development Department  
City of Hamilton