

December 3, 2025

City of Belleville
Greg Pinchin, Manager of Approvals
169 Front Street
Belleville, Ontario
K8N 2Y8

**Re: Hanley Park North
Draft Plan of Subdivision and Rezoning Applications
City Files: B-77-1115 & 12T-20001**

Dear Mr. Pinchin,

We have recently submitted an updated transportation report and hydrogeological memo in support of the application referenced above. All other material that supports the application remains relevant and unchanged as it relates to the revised draft plan from 2021. As you will recall, the original plan depicted 156 residential units while the current plan shows only 103 units.

We understand that there is no longer a requirement to conduct public hearings for plans of subdivision. However, a public meeting will be scheduled as it relates to the zoning bylaw amendment (ZBA file No. B-77-1115) to enable the neighbouring property owners to have the opportunity to respond to the adjustments made to the ZBA in relation to the changes to the draft plan of subdivision.

In preparation for a public meeting, below is a response to the public submissions from the previous meeting. Given there were many submissions made by the public, we have grouped them into themes to respond, as found below.

Recreational Use of the Land

A significant number of the public comments were related to the use of the property for recreational purposes, especially for dog walking, despite that it is not public space. While the owners could have blocked or limited the public from access (i.e. fenced off the property) they have chosen not to do so. Even though the land is privately held, our clients are proposing to dedicate 77 % of the land to a public body. This will enable that land to become protected public property. Further, as part of the development, there will be potential for walking trails within the public blocks to allow for the continued public recreational use of the land. We would also highlight that the walkways within the subdivision will allow for pedestrian connectivity with the existing neighbourhood to the public land and the park.

As you may be aware, our client is the same company that also owned and obtained draft plan approval for what is now being developed as Parkville Greens. They provided for 10% parkland dedication in that subdivision and redesigned the lotting to save a 100-year-old Oak tree. Their track record, working cooperatively with the City in addressing recreational and natural heritage issues, is unprecedented and has shown that they are prepared to work with the City on this application as well.

Impacts on Vegetation and Habitats

A number of questions have been raised regarding the need for a 120m buffer where a 30m buffer is depicted on the draft plan of subdivision. At the time the application for draft plan of subdivision was made, the *Provincial Policy Statement* required the demonstration of no negative impacts on the natural features or on their ecological functions. The implementation of that policy was enabled through the Province's *Natural Heritage Reference Manual* and Quinte Conservation's *Development and Interference with Wetlands and Watercourses Regulation - Policies and Procedures Manual*, both of which recommend that the adjacent land width for considering the potential negative impact be 120 m for most significant natural features including wetlands and woodlands.

More recently Ontario Regulation 41/24 revoked all previous policy and implemented a 30m setback to wetlands regardless of significance. For this application, the applicant had previously demonstrated that a 30m buffer to the wetland was appropriate, the Provincial policy now allows for a 30m buffer.

The other public comments made previously were a concern for the impact on wildlife and vegetation. While there will be a reduction in some habitat and vegetation, as noted above, over three quarters of the property will be retained in its current state providing for preservation of the various plant communities and species which will cover all types of existing habitat. The reduction in habitat does not give rise to a negative impact on either the feature or its ecological function because, as the EIS has identified, the feature and functions will continue in those areas.

Additionally, there was an expressed concern about the impacts of the fill that will be needed to develop the subdivision. Any fill that is required will meet required standards to enable construction, as well as any stormwater run off from it, to be controlled during construction to prevent erosion.

Flooding and Drainage

The public have expressed concern about the possibility for flooding the development of the property may contribute to. However, the proposed development is located outside of the flood plain as determined by the Conservation Authority. Further any stormwater from the subdivision will discharge ahead of the upstream peak flows which will not contribute to downstream flooding.

Since the wetland boundary and the flood plain boundary on the subject site are similar, in most cases the proposed development will be setback 30 m or greater from the floodplain boundary, thereby allowing for additional protection from flooding.

A stormwater management report has been prepared to address the stormwater runoff from the subdivision, and a stormwater management facility is proposed that will address the water runoff and water quality being released into the creek and wetlands.

Traffic

The public have raised concern with the volume of traffic using Tessa Blvd, Mercedes Meadows, Oak Ridge Blvd and Haig Road. In 2021, a transportation study had concluded that there were no traffic impacts to the neighbourhood. More recently, the City of Belleville had requested that the transportation study be updated to include traffic that may have increased due to development that has progressed ahead this application. In October 2025, an updated transportation study was submitted that included additional information on developments that have occurred. The conclusion of that study was that levels of service on Haig Road, the collector road that would be most impacted from development north or south of the subject site, was that traffic would not be impacted with the development of the property. While the initial transportation study concluded that there would not be an impact to the neighbourhood if the subdivision were to proceed, with the lot reduction from 156 to 103 residential units as noted in the revised report, the conclusion remains valid.

A further concern raised was that emergency access that is proposed located within the area stormwater management pond. The area was planned as the stormwater management facility, not as a park and as such does not have public access. The city does not have a zone for stormwater management facilities; therefore, they are zoned as open space (i.e. OS2). As a result, the use for the stormwater management facility for emergency access will not result in the loss of parkland.

Of further note is that the draft plan of subdivision does not depict an extension of Victoria Ave into the proposed subdivision. Quinte Conservation staff indicated they would not support the extension across the wetland to allow for a second access point. In addition, the property includes lands that could accommodate a cul de sac at the end of Victoria Ave. However, the build-out of that cul de sac would require encroachment into the wetland area which would not be permitted.

Conclusion

The land that is proposed for development is designated Residential in the Official Plan and is therefore clearly anticipated to provide new housing opportunities for the city. While the site is located immediately adjacent to existing residential development, it is understandable that concerns over how the site will be developed. However, the subdivision provides a variety of lots sizes including townhouses and does not, in our opinion, create urban sprawl but represents a planned, logical and appropriate extension of the existing community. We trust that the updated reports and studies provide sufficient support to satisfy the public and allow for a ZBA approval.

Sincerely,
MACAULAY SHIOMI HOWSON LTD.

Joe Cimer

Joe Cimer, RPP
Land Use Advisor