

November 20, 2023

Tim Williams, MCIP, RPP  
Planning Manager  
County of Middlesex  
399 Ridout Street North  
London, ON N6A2P1

**Re: Addendum to Development Assessment Report for  
Buchanan Crossings Subdivision in Strathroy**

Dear Mr. Williams:

Chris Hart & Associates submitted a Development Assessment Report (DAR) on October 25, 2023, which incorporated the comments received as part of a third-party review of the previous DAR from September 2023. This addendum has been prepared to address additional items raised in your e-mail from November 17, 2023. Please view the response to these items below.

**Comment 5**

**Comment:** It should be understood that any trees with bat habitat (cavities, cracks, crevices, and areas of loose bark) should be considered potential habitat for SAR bats. The surveys conducted were not appropriate for detecting bats. The proponents are responsible for ensuring development does not impact SAR bats, and it should be a condition of approval that bat habitat in trees to be removed should be identified, and MECP consulted if trees with bat habitat are to be removed.

**Response:** Any trees with bat habitat are considered potential habitat for SAR bats. It is recommended that as a condition of approval that bat habitat in trees to be removed shall be identified, and MECP consulted if trees with bat habitat are to be removed.

**Comment 7**

**Comment:** It was stated that three amphibian surveys were conducted, but only one field sheet was provided. Field sheets for bird surveys do not have weather conditions recorded on them. Please note that recording weather conditions is standard practice for bird, amphibian and turtle surveys. However, since most of the habitat that would likely support this type of wildlife is protected, this point is considered moot.

Response: Only one field survey for amphibians identified frog calls. All habitat that would support this type of wildlife would be protected.

**Comment 15**

Comment: Please clarify whether a 30 m buffer has been provided from the dripline of the woodland. The previous response to this comment (in September 2023) indicated that a 30 m buffer was to be set back from the walnut grove, and the recommendation for a 30 m buffer from the walnut grove has been added on page 23, 43, 46 and 48 (shown most clearly by redline version). However, the section in the revised DAR on "Proposed Mitigation" (page 50) has deleted the recommendation for the 30 m buffer. If the buffer is no longer proposed to be 30 m, the buffer width be stated and the rationale for the width provided so it can be reviewed.

Response: It is recommended that a 30-metre buffer be provided from the dripline of the woodland. This was unintentionally removed from the "Proposed Mitigation" section of the previous DAR.

**Comment 16**

Comment: As noted above, SAR bats are not detected in conventional surveys such as those described in the DAR. As a condition of approval, all trees to be removed should be surveyed for bat habitat as described above, and MECP consulted if trees with bat habitat are to be removed.

Response: Any trees with bat habitat are considered potential habitat for SAR bats. It is recommended that as a condition of approval that bat habitat in trees to be removed shall be identified, and MECP consulted if trees with bat habitat are to be removed.

**Comment 19**

Comment: Please clarify whether the 30 m buffer is still proposed from the dripline of the woodland, as stated in the original response to comment 15.

Response: It is recommended that a 30-metre buffer be provided from the dripline of the woodland. This was unintentionally removed from the "Proposed Mitigation" section of the previous DAR.

**Comment 24**

Comment: The Migratory Birds Convention Act (MBCA) applies to most birds that nest in agricultural lands, including Savannah Sparrow, Field Sparrow, Song Sparrow and Killdeer, which were reported on the site. It should be a condition of approval

that if vegetation removal is scheduled within the bird activity season, a qualified surveyor must survey the area for birds protected by the MBCA. If MBCA-protected birds are found nesting, the nesting area should be protected until the nest is no longer active.

**Response:** It is recommended that if vegetation removal is scheduled within the bird activity season a qualified surveyor will survey the area for birds protected by the MBCA. If Migratory Birds Convention Act – protected birds are found nesting, the nesting area shall be protected until the nest is no longer active.

**Comment 25**

**Comment:** Please see response to comment 15.

**Response:** Please see response to comment 15.

**Comment 30**

**Comment:** Please address the comment regarding the proposed buffer to the woodland, as requested in #15.

**Response:** Please see response to comment 15.

**Comment 35**

**Comment:** As noted above, it should be a condition of approval that surveys for bat habitat be conducted for any tree proposed to be removed. If bat habitat is found, the MECP should be consulted on how tree removal should be accomplished according to the Endangered Species Act, 2007.

**Response:** Any trees with bat habitat are considered potential habitat for SAR bats. It is recommended that as a condition of approval that bat habitat in trees to be removed shall be identified, and MECP consulted if trees with bat habitat are considered for removal.

**New Comment**

**Comment:** The original recommendation in the DAR for installing a fence at the rear of lots 109 to 134 has been deleted, but not in response to a comment. Please explain the rationale for deleting this mitigation. The mitigation appeared reasonable in the DAR as it provided appropriate protection from the potential encroachment by landowners (which is very common in lots adjacent to natural features). The recommendation should be reinstated.

**Response:** Fencing is an efficient mitigation measure for development that directly abuts a natural heritage feature. It prevents potential negative impacts associated with

encroachment onto the feature, restricts movement of household pets and their impact on wildlife, and restricts unlawful dumping of refuse into adjacent natural features.

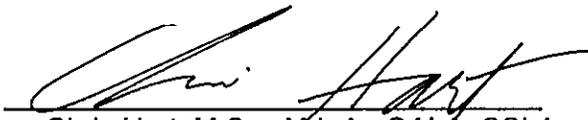
However, in the case of the proposed development, the rear lots are located between 54 metres (Lot 134) and 130 metres (Lot 109) from the nearest natural heritage features. Due to the large separation between the development and these features, fencing is not necessary to mitigate any impact the subdivision may have on nearby natural heritage features.

While the lands west of the development are outside the Settlement Area, there is a conceptual design to develop the lands west of Lots 109 to 119 and potentially enlarge Lots 120 to 134. There's also potential for a multi-use trail to be located in this area that residents may want direct access to. For these reasons, it would be more appropriate to require fencing as part of a future development application once the details of the development pattern are known and when the development directly abuts the natural heritage feature and its associated buffer area.

I trust that the response provided in this addendum addresses the comments from your November 17, 2023 e-mail. Please contact me if you require any further information.

Yours very truly,

Chris Hart & Associates

Per   
Chris Hart, M.Sc., M.L.A., OALA, CSLA  
Ecologist / Landscape Architect

Cc: Eva Baker, Municipality of Strathroy-Caradoc  
Klaud Czeslawski, SLD Group Inc.  
Jordan Fohkens, B.M. Ross and Associates Limited