

**Meeting Date:** October 6, 2025  
**Department:** Building, By-law, and Planning  
**Report No.:** BBP-2025-92  
**Submitted by:** Tim Williams, Manager of Planning  
**Reviewed by:** Jake DeRidder, Manager of Growth and Development  
**Approved by:** Rob Browning, Chief Administrative Officer

**SUBJECT:** Applications for Official Plan Amendment (OPA 2-2024) and Zoning By-law Amendment (ZBA 4-2024)  
101 Hull Road and 6 Locke Heights

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**RECOMMENDATION: THAT:** Amendment No. 22 to the Official Plan of the Municipality of Strathroy-Caradoc (Application OPA 2-2024) which would amend the natural hazard boundary line for the lands municipally known as 101 Hull Road in Strathroy be adopted and forwarded to the County of Middlesex for consideration and approval, and further;

**THAT:** the rezoning application, ZBA 4-2024 which would rezone the lands municipally known as 101 Hull Road, Strathroy from 'Low Density Residential (R1) zone' to site specific 'High Density (R3-28) zone' as amended by staff, be approved, and further;

**THAT:** By-law No. 108-25 and By-law No. 109-25 be referred to the Consideration of By-laws Section of the Agenda.

**EXECUTIVE SUMMARY:**

- This is an evaluation report that provides background policies and the consultation including the statutory public meeting. The applications' supporting documentation has been amended and additional information provided to address comments before this planning evaluation report prepared.
- The proposal requires an official plan amendment to modify the Hazard layer in the Official Plan and a zoning by-law amendment to rezone the property from Low Density Residential (R1) zone to site specific High Density Residential (R3-28) zone.
- The current proposal includes 26 townhouse dwelling units with a mix of bungalows with no basements and bungalows with walk-out basements. The single access for the development is from Locke Heights however a future access is proposed to Hull Road.

The units will be accessed through an internal private street network. The plan includes two parking spaces per unit as well as four visitor parking spaces.

- A public open house was held on April 3, 2024.
- The statutory public meeting was held on May 21, 2024
- The municipality has received comments both expressing support and concern regarding this application. Concerns relate to the location of the access, quality of Hull Road, adverse impact on the adjacent homes, and concerns for natural heritage preservation. The letters of support include comments noting the target market (seniors) will have less impact on the neighbourhood and that the demand for this type of dwelling is high.
- The Applicants have made some changes to their consultant team which has also resulted in changes to proposal materials submitted. Planning Department has circulated the plans and have received comments from agencies and departments on the application. Planning Staff find that application is supportable with additional details needing to be addressed at site plan approval application stage.

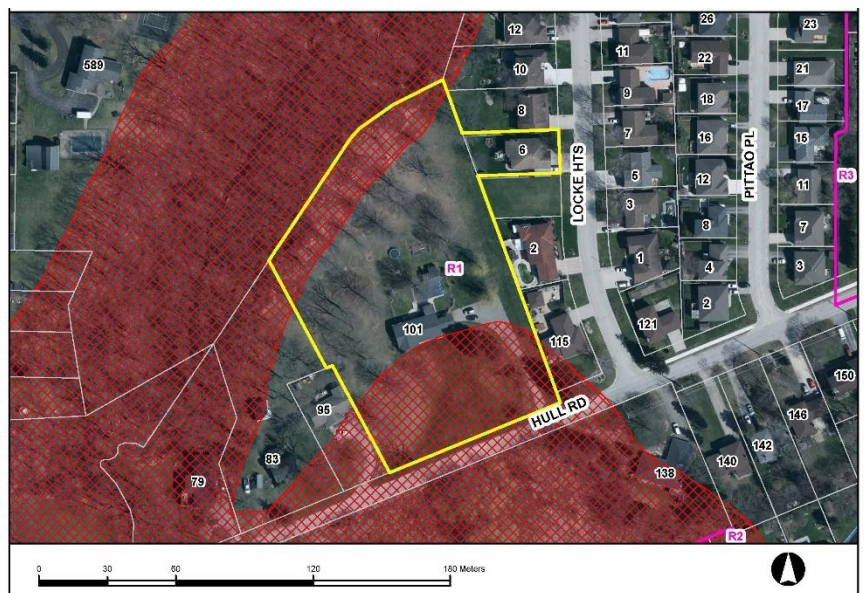
#### PURPOSE:

The purpose of the subject evaluation report is to provide Council and the public background information on the proposed official plan amendment (OPA) and zoning by-law amendment (ZBA), and evaluation of the proposal compared to the applicable policies. The applications' supporting documentation has been amended and additional information provided to address comments before this planning evaluation report was prepared.

#### SITE CONTEXT:

The lands are municipally known as 6 Locke Heights and 101 Hull Road, Strathroy and are approximately 1.28 ha (3.16 ac) in size with approximately 80.9 metres of frontage along Hull Road and 19 m of frontage along Locke Heights. The lands are currently used for residential purposes and contain a dwelling on each of the parcels. The property is located on the north side of Hull Road and the west side of Locke Heights.

These lands are currently designated for residential with a natural hazard overlay along the Hull Road frontage and are zoned for residential uses.



The lands have municipal water, sanitary and storm services located along both Locke Heights and Hull Road. Both Locke Heights and Hull Road are under municipal jurisdiction.

## **PROPOSAL SUMMARY:**

The purpose of the official plan and zoning by-law applications are to facilitate the development of 26 townhouse dwelling units on a private road network. The proposal has changed since the original submission. The following is a highlight of the changes:

- 1) A single access to Locke Heights is continuing with a second future access to Hull Road.
- 2) Locke Heights access point has been amended to remove visitor parking spaces.
- 3) Common lot lines with properties that front onto Locke Heights (2, 4, 8 and 10 Locke Heights and 115 Hull Road) have a proposed fence to mitigate impacts to noise, light and improve effects to privacy.
- 4) The number of visitor parking spaces is four whereas previous configuration had eleven.
- 5) The retaining wall along the Hull Road frontage has been removed and replaced with dwellings that have walkouts. The buildings are essentially acting as the retaining walls.

The proposal includes a single access from Locke Heights and future access to Hull Road. The applicants have noted sightline concerns along Hull Road as the reason for not making this the primary access point. The Hull Road frontage will include a grade change that will increase the height of the main portion of the site by adding a significant amount of fill in the front portion of the property and however as noted in the above changes the retaining wall along the frontage has been replaced with minor retaining steps with most of the grade change being made in the buildings (see also attached grading plan). The proposal also contains single car garages and double-wide driveways for a total of three parking spaces per dwelling as well as 4 visitor parking spaces. The St. Clair Region Conservation Authority has been consulted on matters of flood hazard. The Conservation Authority has also agreed with the depicted location of the stable top of bank as included in geotechnical report.

This development is intended to be privately held as one property and the units will be rented. The applicants have advised that the development will be marketed to seniors.

Applications for OPA and ZBA were received and deemed complete on April 2, 2024, the submission materials are included with report on the agenda.

The original and current site plan is shown below, and the current is included as an attachment to this report.

Original Site Plan





- 2) The site is close to a Significant Woodland and contains Natural Heritage Features. A review of the Development Assessment Report is on-going and is looking to confirm adequate means of limiting human impact on the natural heritage feature.

*Response: The development assessment report has been peer reviewed, leading to an addendum and led to changes to the setback of the townhouses and patios. A barrier will be secured as part of the site plan approval.*

- 3) The proposal will be required to provide a road widening, sidewalk and lighting along the Hull Road frontage which would be secured through the site plan process.

*Response: This road widening has been confirmed, and the proposed development can provide the sidewalk and lighting without an encroachment.*

- 4) The Geotechnical report includes an “Erosion Hazard Limit” that does not match the site plan at the rear of units 18 to 20. This needs to be clarified to ensure that the proposed dwellings are setback as per the Conservation Authority’s direction of 6 metres.

*Response: The technical documents have been revised to reflect the Conservation Authority's approved staple top of bank. This ensures that the buildings will be setback 6 metres from the stable top of bank. The zoning by-law will reflect the 6 m setback.*

- 5) The development requires two access points as per County Official Plan policy. Comments from County and Local engineering, Land Ambulance, Fire Service, and Police departments confirming the proposed single access point is acceptable have not yet been received and follow-up is on-going.

*Response: The application has been reviewed by the relevant emergency services. Both Land Ambulance and Fire Services have confirmed that the underground utilities are adequately separated from the Locke Heights access. Specifically, no underground services are located within this access, as all required services are provided from the Hull Road frontage. The planned Hull Road access will accommodate a stormwater service within the paved surface. In addition, the water service is situated to the west of the proposed Hull Road access, while the sanitary service is aligned along the eastern property boundary.*

- 6) Discussion with applicants is continuing in regard to access from Hull Road, upgrades to the road and cost sharing of same.

*Response: The applicants have revised the development proposal to include a future second access point on to Hull Road. In order for the development to be serviced the main elevation of the site must be at a certain height so access to existing Hull Road elevation is too steep. Further to this the applicants have noted concerns that connecting this access intersection to Hull Road at the current road condition (elevation) would result in substandard sightlines given the changes in elevation. To accommodate municipal sanitary servicing using a gravity fed system, the main elevation of the site must be constructed at a specified grade. As a result, direct access to Hull Road at its existing elevation would create slopes that are too steep to be*

*functional. In addition to servicing, the applicants have identified concerns that establishing an intersection at the current road elevation would result in substandard sightlines due to the grade changes along Hull Road. The applicants are not proposing to regrade or raise the Hull Road in this area, citing both the limited width of the road right-of-way and the associated costs. The applicant's engineer has provided preliminary road grades that could be used for Hull Road in the future, however the viability won't be fully known until the time of reconstruction. Staff have reviewed the sightline analysis and confirm that, at the posted speed limit of 50 km/h, the required standard can be achieved if access is located at certain points along the Hull Road frontage.*

7) Staff have not yet received the results of the peer review of the Traffic Study.

*Response: The peer review of the traffic study confirmed that the analysis prepared correctly follows the traffic models. The results of the traffic study show that increased car trips will be taken however the intersection at Hull Road and Locke Heights will continue to function at acceptable standards.*

Following are the technical comments:

St. Clair Region Conservation Authority advised that the discrepancies with the top of bank on the plans have been corrected. The erosion hazard limit should remain designated Open Space and be restrictively zoned (i.e. Environmental Protection) to ensure no building or structures will be permitted, other than those required for the purposes of flood and erosion control.

Bluewater Recycling Association advised that the Association has no comments at this time, but we look forward to reviewing the proposed development when the site plans are submitted.

Fire Service has advised that upon review of the proposed site plan for 101 Hull Rd/6 Locke Heights, it is the Fire Department's position that are able accept the proposed site plan specifically the access, road widths and turning radii however will review further site plan details including placement of hydrants, garbage receptacles and a like at site plan application.

County Engineer has advised that they have no objection to the official plan amendment or zoning by-law amendment application. It is acknowledged that the County Official Plan contains a policy that developments such as this should have two access points for emergency services. As the commenting person for ambulance services, The County Engineer offers the following comment:

The property contains a second frontage and would be appropriate to have a second access from this frontage however understanding that there is a grade difference of more than three metres the Hull Road and private road it is possible to mitigate the risk of a single driveway. The proposed width of the right of way for access onto Locke Heights meets the sufficient minimum width and the municipal water and sanitary connections are not located with the driveway. The entirety of the Locke Heights property will be used for access so it will not require the installation of services under the travelled portion of the roadway which is important for any consideration of a single access point. Any future maintenance

or replacement of these services would require the closure of that road and therefore completely isolate the development from emergency access.

### Municipal Engineering Comments:

#### Roads

- The Road Management Study in 2024 identifies Hull Road between Locke Heights and Caradoc Street N for 2031. This study is based on the current road surface condition. It does not explore road widening, which is required to reconstruct Hull Road to Strathroy-Caradoc municipal standard.
- One of the challenges in this location is the minimal road allowance owned by Strathroy-Caradoc. The 330-meter road length between Locke and Caradoc varies in width from 10m to 12.5m of public property. The municipality standard is 20.0m to build a road which means a large amount of property acquisition is required to upgrade this road. From Locke to Penny, we own the necessary 20.0m but as you get closer to Head St, the public ROW narrows back down to 12.0m. As well, the road is in a CA regulated area which will add natural hazard challenges during design and construction when it comes time (as noted above the design of the road improvements has not been completed).
- The applicant is showing proposed future grades along Hull Road to accommodate the entrance on to Hull Road. Although staff don't have a concern with this proposal, these grades are preliminary and may not reflect what is achievable during the detailed design if Hull Road is reconstructed by the Municipality in the future.

#### Public Works

- Road widening will be required along Hull Road frontage, being 10 m from centreline of the constructed road and will be secured during site plan approval.
- Sidewalk and streetlights will be required along Hull Rd frontage and will be secured during site plan approval.
- Construction traffic management plan will be a requirement of site plan approval.
- As part of the circulation of the application a hydrogeological Peer Review was completed and comments on this report will be addressed during the detail design of site plan approval.

Director of Community Services advised that the parkland required is 5% for residential developments however given the size of the dedication it is more appropriate for this development to provide a cash in lieu of parkland.

Manager of Growth and Development advised that a key strategy to address the Municipality's housing affordability challenges is the support for the provision of housing options. The dwelling type proposed as part of this application will help address the need in Strathroy for a more diversified housing stock.

Environmental Review since the Provincial changes to the Conservations Authorities Act, the scope of work for Conservation Authorities no longer extends to Natural Heritage. Accordingly, the municipality has retained a third-party reviewer to provide comments on Development Assessment Review submitted by the applicant's environmental consultation, NRSI. In this case, the third-party reviewer has advised that while they are generally accepting the proposed planting plan, they had noted the following concerns which have been addressed as noted in italics:

- a. bollards and a landowner brochure will not be sufficient to deter encroachment into the buffer. It is recommended that additional more rigorous means be used to deter encroachment.  
*This requirement will be addressed in the site plan agreement and with inclusion of bollards obstructions to limit access.*
- b. the encroachment into the erosion hazard limit, could have impacts. The St. Clair Region Conservation Authority should be consulted, as hazard lands may be subject to Conservation Authority regulation.  
*The plan has been revised to reflect this.*
- c. A landowner brochure should clarify that natural woody debris (including dead and dying trees) should not be removed from the woodland.  
*This requirement will be addressed in the site plan agreement and with inclusion of bollards obstructions to limit access.*

#### **PUBLIC CONSULTATION SUMMARY:**

A Virtual Neighbourhood Open House was held on April 3, 2024. There were members of the public and Council who attended the meeting as well as staff to observe. The application has been circulated to agencies and the public in accordance with the requirements of the Planning Act. This included the circulation of the Notice of Public Meeting which included details of the application, a copy of the site plan, and a location map. On April 4, 2024, the Notice of Public Meeting was circulated to property owners within 120 metres of the subject property, two signs were posted on the property as well as circulated agencies and departments.

The following is a summary of comments that were received throughout the process:

- 1) There were concerns primarily related to access for the development being on Locke Heights rather than previous iterations which had access from Hull Road. This issue was split into a number of sub-issues:
  - a) Increased future traffic on Locke Heights;
  - b) Increased demand on Locke Heights during construction leading to degradation of the street pavement;
  - c) Privacy and noise impacts on the properties beside the new access point (4 and 8 Locke Heights); and,
  - d) Impact of headlight shine on the homes on Locke Heights opposite the entrance.

*The applicant's response to this has been to add a future access point to Hull Road, that would be constructed once Hull Road is upgraded by the Municipality. The development proposes a fence along the common boundary line with the development for improved privacy, mitigate light and noise impacts.*

2) The impact of private street lighting on the rear yards of the adjacent homes.

*The applicant will be installing lower height downward facing street lighting that will be secured through the site plan.*

3) The lack of fencing proposed along the perimeter of the subject site.

*The applicant proposes a fence along the common boundary line with the development for improved privacy, mitigating light and noise impacts.*

4) There were other concerns about additional traffic on Hull Road. Associated with this were comments about the lack of sidewalk along the extent of Hull Road.

*The applicant is required to construct a sidewalk along the frontage of the subject frontage.*

5) The proposed zoning is not correct, and the owner should be seeking a 'Lifestyle Community (R4) zone'.

*The Lifestyle Community permits modular and mobile homes. While there was community support for this zone category to be used, this type of housing is not what the applicant is looking to rent to seniors as the modular units, once assembled, are raised from the ground.*

6) The cutting of trees on the property prior to the application being submitted.

*Staff are aware of the trees that were cut on the property prior to the application being submitted. The woodlands conservation officer attended the site and confirmed that the trees removed were not in contravention of the Woodland's Conservation By-law.*

7) There are concerns with pedestrian safety, especially for the senior population that this development is targeted towards, along Locke Heights and Hull Road as there is currently no sidewalk.

*The applicant will be providing a sidewalk along the front of the development.*

Throughout the consultation process a number of letters have been provided and include a more detailed description of the concerns and support that were raised at the public open house and are included in the Consultation Attachment \*5 below.

## **PLANNING CONSIDERATION AND ANALYSIS:**

The subject lands are located within a fully serviced Settlement Area as per the definitions of the Provincial Planning Statement and the County of Middlesex Official Plan. The lands are designated “Residential” under the Strathroy-Caradoc Official Plan. The subject lands are within the Low Density Residential (R1) zone.

Planning staff have reviewed the applications and find that it is consistent with the Provincial Planning Statement 2024, conforming with the County of Middlesex Official Plan as well as the Strathroy-Caradoc Official Plan. The following section will review policies and the reasons for this opinion:

### Planning Act

Under Section 2 of the Planning Act, there are several criteria that a development must meet that addresses public interest. The list includes but is not limited to, the orderly development of safe and healthy communities; the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies; the adequate provision of a full range of housing, including affordable housing; the adequate provision of employment opportunities; the protection of public health and safety; the appropriate location of growth and development; the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians; the promotion of built form that, is well-designed, encourages a sense of place, and provides for public spaces that are of high quality, safe, accessible, attractive and vibrant.

Under Section 3 of the Planning Act, where a municipality is exercising its authority affecting a planning matter, such decisions, “shall be consistent with” all policy statements issued under the Act.

Section 36 (1) of the Planning Act, provides for Council to pass a holding symbol “H” in conjunction with any use designation to limit the uses on the property until such time in the future as the holding symbol is removed by amendment to the by-law.

### Provincial Planning Statement (2024)

The PPS provides policy direction on matters of provincial interest related to land use planning and development.

Section 1.1.1 establishes that healthy, liveable, and safe communities are sustained by accommodating an appropriate range and mix of residential housing (including additional units, affordable housing, and housing for older persons) to meet long-term needs and promotes cost-effective development that minimizes land consumption and servicing costs.

Section 1.1.3.1 states that settlement areas will be the focus of growth. Land use patterns within settlement areas shall be based on:

- Densities and a mix of land uses which are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available;
- Support active transportation;
- Efficiently use land and resources; and,

- A range of uses and opportunities for intensification and redevelopment in accordance with the criteria of Policy 1.1.3.3, where this can be accommodated.

Section 1.4 and 1.5 of the PPS identifies that planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents as well as promoting the creation of healthy, active communities by encouraging pedestrian connections.

Section 1.6.6 of the PPS outlines the hierarchy for sewage and water services and establishes that municipal water and sewage services are the preferred form of servicing for development areas to support protection of the environment and minimize potential risks to human health and safety.

Section 1.7 of the PPS speaks to the long-term economic prosperity which includes the encouragement of residential uses that respond to the dynamic market-based needs and provide housing options.

Section 3.1.1 of the PPS outlines that development should be directed away from hazard lands and flood plains which would be impacted by flooding and erosion hazards.

#### **Comments on Consistency with the Provincial Planning Statement 2024**

- The proposal is located within a designated growth area of a settlement area, in a settlement area where the supply of residential land is less than 20 years.
- The residential dwellings will be fully serviced and provide for the efficient use of existing infrastructure and public service facilities.
- The proposal will be an infill development that has been within the settlement boundary for many years and is an appropriate location for development.
- The hazard land mapping has been reviewed and confirmed to be limited to the south side of Hull Road further the Conservation Authority has confirmed the drainage from the site has been appropriately directed to the water course to the west/south and it will not have an impact on other Municipal Drains in the area.

Given the above, it is staff's opinion that the application is consistent with the Provincial Planning Statement.

#### **Middlesex County Official Plan (2023 Update)**

The subject lands are designated 'Settlement Areas (Urban and Community)' according to *Schedule A: Land Use*, as contained within the County of Middlesex Official Plan.

Section 2.3.7 of the Middlesex County Official Plan identifies that the County encourages a wide variety of housing by type, size, and tenure to meet projected demographic needs and market requirements of current and future residents of the County, and further, that the County will support intensification and redevelopment within settlement areas where an appropriate level of services are, or will be,

available to service the lands, and further, that 15 percent of all development occur by intensification and redevelopment.

Section 2.4.2.2 of the MCOP indicates in subsection f) that the development should encourage safe, convenient, and visually appealing pedestrian and cycling infrastructure for all ages and abilities. Subsection g) limits direct vehicular access to County Roads where access is available by a local road. Section h) and i) identifies the need for an engineer's report for developments that are likely to generate traffic and any improvements be paid for by the developer. Subsection l) requires that all new residential developments provide a minimum of two access points to the existing road network. Exceptions to this policy shall be considered if the proposed street pattern is approved by the local Municipality, emergency service provider(s), and the County Engineer.

Section 2.4.5 states that the County shall encourage development on municipal water and sanitary systems.

Section 3.2.2 directs that settlement areas shall develop in a manner that is phased, compact, and does not result in a strip pattern of development. Further, development is to complement the positive elements of the existing built form in an effort to preserve the historic character of the area.

County Council adopted Amendment No. 3 to the County official plan on July 19, 2022, and received Minister approval on July 7, 2023. The purpose of the Amendment was to update the Official Plan to ensure that the land use planning policies are current, reflect Provincial legislation and policy, have regard for matters of Provincial interest and any guideline documents, are consistent with the Provincial Policy Statement (PPS), and reflect changing community needs for the next 25-years.

### **Comments on the Conformity with the County of Middlesex Official Plan**

- As noted above, the property is within a designated growth area of a settlement area and will be fully serviced and provides for the efficient use of infrastructure and public service facilities.
- The development will be compact and will utilize lands within the settlement area in a manner that will increase the variety of housing types in this neighbourhood.
- The proposed townhouse buildings are a built form that would be expected to generate some traffic however this is expected to peak at different times than adjacent residential neighbourhoods.
- The proposal initially provides one access point however; the owners have proposed a future connection out Hull Road. The policy section 2.4.2.2 l) requires two access points and provides for flexibility in requiring two access points by noting that one access point is permitted if it is designed to the satisfaction of emergency services, the municipality and the County Engineer. The emergency services have reviewed the proposed access and note that there are no services located in this area and further that the access is approximately 19 m in width so there are options within the area for access and as such do not have an objection to the development proposal
- applicant has designed a second site access; however Hull Road needs to be raised, and the developer is not willing to pay for this improvement to the right of way. The details of the access point will be secured during the site plan process.

- The proposal results in the orderly development of this underutilized property.

Given the above, it is staff's opinion that the application conforms with the County Official Plan.

### Strathroy-Caradoc Official Plan

The subject lands are designated 'Settlement Area' and 'Residential' according to *Schedule A: Structure Plan* and *Schedule B: Land Use & Transportation Plan*, respectively. The Strathroy Caradoc Official Plan has been updated through OPA 14 in 2022 and then received approval from County however it was appealed. The purpose of this Amendment is also to update the Official Plan to ensure that the land use planning policies are current, reflect Provincial legislation and policy, have regard for matters of Provincial interest and any guideline documents, are consistent with the Provincial Planning Statement (PPS), and reflect changing community needs for the next 25-years. The changes in OPA 14 to the Residential designation do not materially change the impact of the policies applicable to this application. An additional note relating to each of the policies below has been included to provide detail for some of the changes as a result of OPA 14.

Section 2.4.1 encourages the provision of a wide variety of housing types with greater densities within the settlement area. Residential intensification and redevelopment are encouraged where compatible with existing development and infrastructure is appropriate. OPA 14 encourages development intensification where amenities are available rather than being compatible with existing development.

Section 2.4.4 encourages the municipality to partner with other levels of government to ensure adequate supply of housing is available for those in social and economic need. OPA 14 now includes this in a shared housing policy but still includes this intent of supply for all residents.

Section 2.4.6 establishes that residential intensification shall be encouraged in settlement areas where it is complementary to, and compatible with, the nature, scale, design, and general character of neighbouring development, and where municipal services and facilities are capable of accommodating the development. Where residential intensification is proposed, it shall keep with the character of the area and not adversely affect neighbourhood stability. OPA 14 continues the complementary reference and removes compatible with phrase from the policy.

Section 2.4.8 of the SCOP outlines the importance of housing affordability and meeting the social, health and well-being of current and future residents. OPA 14 continues this intent.

Section 3.2 outlines the goal of maintaining adequate supply of housing, more specifically dwelling types, tenure, and affordability. The section also has the objective to maintain the essential qualities of privacy, quiet enjoyment, public health and safety, and land use compatibility in residential areas. OPA 14 has modified this to focus on land use compatibility in neighbourhoods but continues this intent.

Section 3.3.4 provides policies for lands designated 'Residential' and identifies that primary uses include residential purposes including a range of housing types and densities from single detached dwellings to high-rise apartment buildings. Secondary uses may be permitted that are complementary to, and compatible with the area, serve the neighbourhood needs, and do not detract from the predominantly residential nature, such as neighbourhood parks. OPA 14 does not substantially modify this direction.

Section 3.3.4.5 further details the policies related to the medium density development. "Medium density development (e.g. walk-up apartments and townhouses) shall be encouraged on lands that have access onto an arterial or collector road. Development on local streets shall be permitted within close proximity to intersections with arterial or collector roads and providing vehicular conflicts are minimized. The height, density, arrangement and design of buildings and structures shall complement and not adversely impact neighbouring lower density residential development." OPA 14 modifies this section to relate the development to density rather than number of storeys or use. Based on the updated policies this development could be considered 'low density' (townhouses and less than 31 units per hectare).

Residential intensification within Strathroy is specifically addressed in Section 3.3.4.7, which identifies that residential intensification in existing developed areas is considered desirable to make efficient use of underutilized lands and infrastructure. This is subject to evaluation and conditions, as necessary, to ensure that the development is in keeping with the established residential character and is appropriate in terms of height, lot fabric, building design, dwelling types, and parking, and where appropriate services are available. OPA 14 focuses on having 15% of development to be in the form of residential intensification and mix of housing options.

3.4.1.4 Local Street policy notes the primary function of local streets is provide direct access to abutting properties. For streets such as Locke Heights (single access/ cul-de-sac) the expectation is that there would be a maximum of 200 vehicles per day. For streets like Hull Road the typical carrying capacity is noted as 1500 vehicles per day. OPA 14 has removed this 200 per day policy.

#### **Comments on Conformity to the 2008 Strathroy-Caradoc Official Plan**

- The proposal is located within a settlement area, within the Strathroy-Caradoc Official Plan.
- The proposal will be fully serviced and provides for the efficient use of infrastructure and public service facilities. Engineering staff have confirmed municipal service (water, sanitary and storm) capacity and have noted that Stormwater needs to be directed to the municipal drain which will be secured at site plan.
- As noted above, the development proposes a housing type that is less common in Strathroy, as such the development will increase accessibility to the apartment dwelling type.
- The proposed layout represents an efficient use of lands, further it represents intensification of development.
- The proposal is not meeting the definition of "affordable" units however the units are not overly large dwellings making them more attainable to a wider group of people.

- The access on Locke Heights will see an additional 30 vehicles during the two peak hours and existing counts have noted 250 vehicle trips are made daily. The Hull Road traffic counts range from 1000 to 1300 per day which is in line with a local road count. It is important also to note that these rates were changed in OPA 14.
- The development is to be designed to complement the design of the existing buildings in the area.

As noted in the background OPA 14 has been appealed to the Ontario Land Tribunal and while it was noted in the policy section of this report it has no legal implications for this application. It is worth noting that the application would conform with the new policies.

Given the above, it is staff's opinion that the applications with the Official Plan Amendment conform to the Strathroy-Caradoc Official Plan.

#### Strathroy-Caradoc Zoning By-Law No. 43-08

The property is currently within the Low Density Residential (R1) zone, and the proposal is to rezone the property to High Density Residential.

Section 3.3 of the zoning by-law outlines different holding provisions limit the use of the land until such time as the conditions of the hold is/are lifted. The application currently is not proposing any provisions.

The 'R3' zone is intended for lands that are designated 'Residential' in the Strathroy-Caradoc Official Plan and permits a range of higher density residential uses, such as multiple unit dwellings, apartment buildings, townhouses, long term care facilities. The zone does not permit single detached homes.

The following chart identifies the zoning provision applicable to the R3 zone as well as the zoning statistics for the proposed townhouses. Bold numbers below indicate provisions that do not meet the zoning standards. The application is not requesting and site-specific development provisions currently.

#### **Comments on Amendments to the Strathroy-Caradoc Zoning by-law**

The layout has been designed to follow the development standard policies with seven deviations, minimum rear yard setback, landscape open space, setback and size of accessory structure, building height landscape strip adjacent to R4 zone, parking coverage 40% (max 25% permitted). This has resulted in a site-specific zone for development. The plan has not changed since the public meeting. The following site-specific provisions are proposed along with the analysis.

- 1) Rear yard setback – the proposal is providing a rear yard setback of 4 m whereas the by-law requires 9m. The proposed rear yard for this development is the common lot line with 95 Hull Road which is opposite the front lot line which is on Locke Heights (the smaller of the two lot lines). This from major frontage (Hull Road) appears to be a side yard and the rear yard opposite Hull Road will have in excess of 12 metre depth to the property line. There would be minimal issues with privacy and overlook as a result.

- 2) Deck/Porch encroachments the by-law requires the extensions to be 2.5 m whereas 3 metres is proposed. It is understandable why a covered space would be proposed as it would provide greater protection from the elements, and it would have limited impact on what the space would be used for. The additional 0.5 m projection would not have significant changes to privacy and no impact on overlook for the neighbours.
- 3) The internal driveway where there are parking spaces the driveway/parking aisle is required to be 7.3m whereas 6 m is provided. This is limited to four visitor spaces opposite a block of townhouses which are located centrally on the plan. This is straight section of the private road, so it is not expected to have a significant impact.

<b>Provision</b>	<b>High Density Residential (R3) Zone</b>	<b>Proposed</b>
Use	Apartments, multiple unit dwelling, and townhouses use	Townhouse Dwellings
Accessory Buildings	Other than a private garage, 10 m <sup>2</sup> maximum floor area Max height 4.5 m	Utility shed less than 10m <sup>2</sup>
Lot Frontage (min)	6 m per unit	8.6 m per unit
Lot Area (min)	210 m <sup>2</sup> per unit (5,460 m <sup>2</sup> ) towns	492 m <sup>2</sup> per unit (12792.4 m <sup>2</sup> )
Front Yard Depth (min)	4.5 m	+25 m
Side Yard Width (min)	2 m	2.0 m to .13.86 m
<b>Rear Yard Depth (min)</b>	<b>9 m</b>	<b>4.16 to 8.51 m</b>
<b>Encroachment decks and porches</b>	<b>2.5 m</b>	<b>3.0 m</b>
Lot Coverage (max)	45%	32.74%
Landscaped Open Space (min)	30%	45.84%
Outdoor Common Amenity Area (min)	20 m <sup>2</sup> per unit (520 m <sup>2</sup> )	No dimension provided however not a requested change
Parking Coverage (max)	25%	No coverage provided; however, staff have estimated to be less than 20%
Parking to location	None in front or exterior side yards	No parking in front yard
Parking, aisle, or driveway	Not permitted between building and street line	No Parking proposed between building and street line
Parking	1.5 parking spaces per unit – tenant = 39 sp	Proposed = 52 sp

	0.15 parking spaces per unit- visitor = 4 sp	Res Visitor= 11 sp
Building Height	15 m	~5.0 m
Accessible Parking	2 Type 'A' 3.4 m by 5.4 2 Type 'B' 2.4 m by 5.4	While not identified the site has capacity to provide this.
Parking Space Dimension	2.6 m by 5.4 m	2.7 m by 5.5m
<b>Parking aisle width (adjacent to visitor parking spaces width)</b>	<b>7.3m</b>	<b>6.0 m</b>

**FINANCIAL IMPLICATIONS:**

This application would have a positive impact on assessment growth and tax revenues. The amount of growth is dependent on the assessed value of the dwellings on the properties which review is completed by the Municipal Property Assessment Corporation (MPAC). Financial services will work with Planning Staff to collect any required security deposits / bonds related to the potential development.

The Municipality will also receive Development Charges as per the most recent Development Charge By-law and subsequent indexing / phasing. This would be offset by increased costs associated with maintaining any new assets assumed (sidewalks and lighting along Hull Road). Upon building permit issuance, Finance will help calculate the development charges, subject to any credits or exemptions, if they arise at that time.

The Municipality will also receive building permit fees as per the most recent Building Fees and Charges By-law. The amount of building permit fees collected will be determined upon the refinement of the building plans during preparation of the permit application.

Ultimately, upon the substantial completion of the development, the municipality will assume all infrastructure found on municipal streets, (including sidewalks and municipal services) as new assets that will require a commitment for future maintenance. As this development will remain under private ownership, the Municipality will not be assuming the internal streets and infrastructure, including the proposed fencing or, now smaller, retaining walls.

With respect to Hull Road upgrades, there are no capital funds committed to this project at this time, nor has it been identified as a DC eligible capital project in the existing Development Charge by-laws. Consideration of adding it to a future capital project could rely on the results of the Road Needs Study which identified this road for repair but not upgrade in the next ten years.

**STRATEGIC PLAN ALIGNMENT:**

This matter is in accord with the following strategic priorities:

1. *Local Infrastructure and Capital Investment:* Households and businesses in Strathroy-Caradoc will be supported by reliable, financially responsible, and well-maintained infrastructure networks.

2. *Economic Development, Industry, and Jobs*: Strathroy-Caradoc will have a diverse tax base and be a place that offers a variety of economic opportunities to current and prospective residents and businesses.
3. *Managing the Challenges of Growth for the Municipal Organization*: Strathroy-Caradoc will be an inclusive community where growth is managed to accommodate a range of needs and optimize municipal resources. We are committed to maintaining operational efficiency and economies of scale through these times of change.

**ALTERNATIVE(S) TO THE RECOMMENDATION:**

Planning Staff have provided their recommendations, however there are alternative options to this recommendation:

1. THAT: the subject report BBP-2024-126 for OPA 1-2024 and ZBA 2-2024 be received for information and the application for Zoning By-law Amendment be deferred sine die.;
2. THAT: the subject report BBP-2024-126 for OPA 1-2024 and ZBA 2-2024 be received for information and the application for Zoning By-law Amendment be denied.; OR
3. THAT: the subject report BBP-2024-126 for OPA 1-2024 and ZBA 2-2024 be received for information.  
AND THAT: Council provide alternate direction.

**SUMMARY AND NEXT STEPS**

Based on the above analysis staff are supportive of the proposed official plan amendment and the rezoning as amended by planning staff as they are considered to be consistent with the Provincial Planning Statement, in conformity with the County of Middlesex Official Plan, Strathroy Caradoc Official Plan and represents good planning.

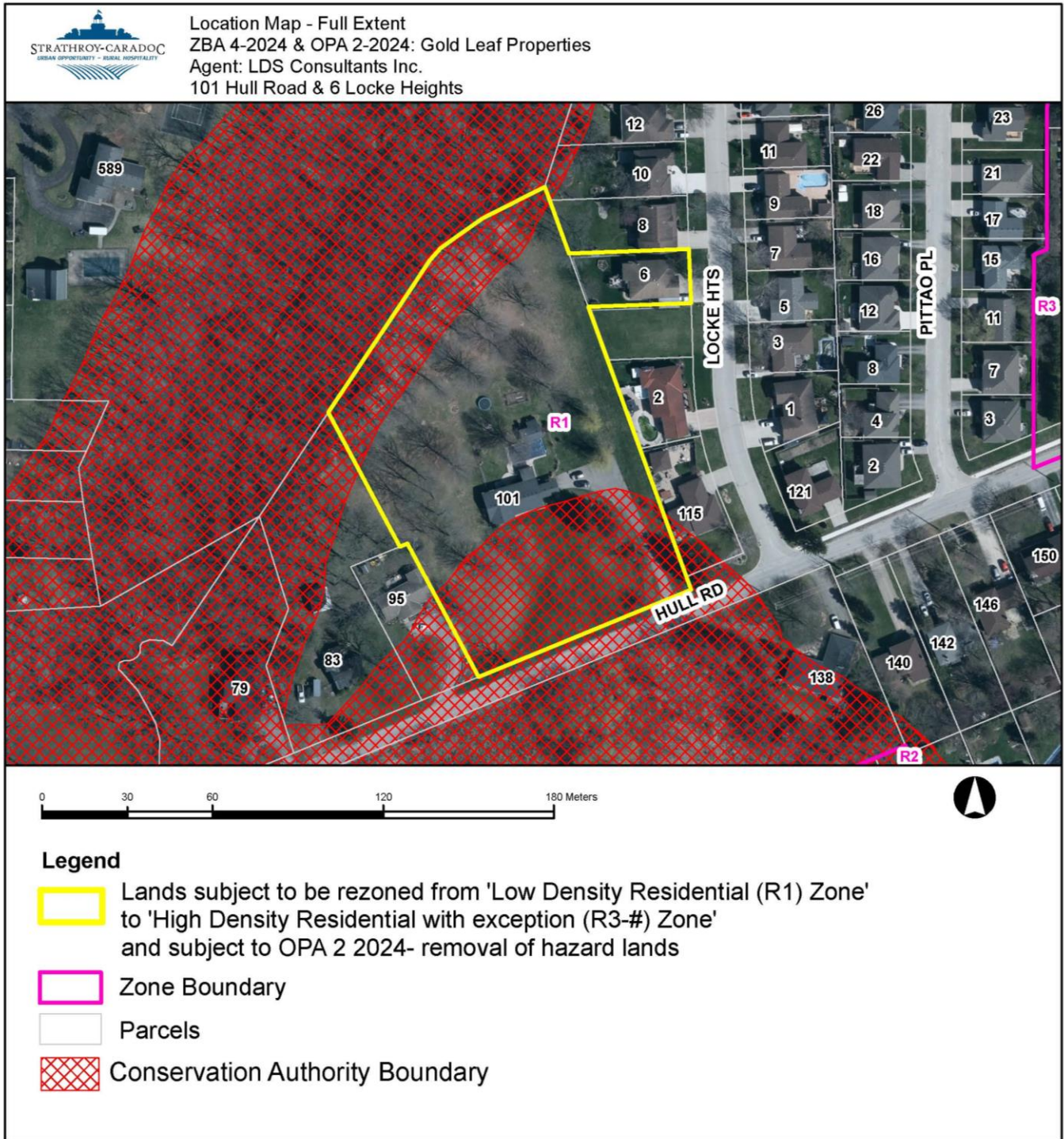
A zoning by-law amendment has been prepared for Council's consideration.

An official plan amendment has been prepared for Council's consideration. It is noted that the Official Plan Amendment will be forwarded to County Council for their consideration.

**ATTACHMENTS:**

- Attachment No. 1 – Location Map
- Attachment No. 2 – Site Plan
- Attachment No. 3 – Application Summary
- Attachment No. 4 – Public Consultation details
- Attachment No. 5– Notice of Completion

# Attachment 1: Location Map



# Attachment 2: Site Plan



## Attachment No. 3 – Public Consultation details

The following letters received in connection with the open house and the statutory public meeting include the following and are included directly under the text of this section:

- 1) Patty and Jack Parker, March 27, 2024
- 2) Jim Ferguson, April 10, 2024
- 3) Patti and Rayner Krista, April 28, 2024
- 4) Jack Parker, May 1, 2024
- 5) Kim Petrie, May 3, 2024
- 6) Abe Suderman, May 6, 2024
- 7) Cassie Tamminga, May 6, 2024
- 8) Art Clark, May 7, 2024
- 9) Nancy Langs, May 8, 2024
- 10) Ross Henderson and Rob Waters, May 14, 2024
- 11) SCRCA response to Henderson/ Waters

### Patty and Jack Parker, Received March 27, 2024

March 26, 2024

To Cindy, Gold Leaf Properties Inc

Thank you for inviting us to the meeting to present our questions and concerns about the townhouse development off Locke Heights/Hull Road. We have questions and concerns about the proposed plan as well as questions and concerns about the construction and site preparation process itself.

Concerns and questions regarding the development, site preparations and construction for townhouses off Locke Heights

Jack and Patty Parker

*Site Development and Construction Concerns and Questions;*

1. We are **concerned about construction delays/disruptions on Locke Heights. There is an emergency access issue and a safety issue** due to contractors and subcontractors parking equipment, trucks, trailers, receiving construction materials along both sides of Locke Heights. **Question1** Will construction site access be limited to a dedicated construction access off Hull Road only? (with proper signage and enforcement)

**Question2** Will Locke Heights have temporary construction restrictions for on-street parking signed and enforced?

*Pedestrians, kids walking to the bus stop, children playing .... we have no sidewalks and must use the road on Locke Heights. Would the municipality consider signage and enforcement of a “no on-street parking restriction” to Locke Heights during all phases of the project including;*

- *demolition/house removals, preconstruction grading and filling, site services installation and building construction period. These restrictions should apply to all phases of this development and include;*
- *the demolition/ house moving of 6 Locke Heights and Temple’s old house*

- *the trucking of the large quantity of fill for the changes proposed in the grading for units 10,11,12 and 13 along Hull*
- *All other “pre-construction” site development and servicing activity*
- *The actual construction of the units*

2. We are **concerned that unofficial, disruptive pre-construction activities will continue** (such as the heavy equipment tree removal and site alterations conducted last fall without permit or approval). Specifically, we are concerned that a large quantity of fill will have to be trucked in from off site to establish a new grade along the existing Hull Rd. frontage to develop units 10,11,12 and 13. We are concerned that 6 Locke Heights house will be demolished or removed fairly soon and then 100’s of tandem axle truckloads of fill will begin rolling in thru this entry off Locke heights and that this activity will continue for a protracted time period with continuous trucking in and out of the site bringing in this fill, creating noise, mud, dust and road debris on Locke heights.

**Question3** Will all further development on the site continue only after the plan approval is complete, zoning changes occur, and required permits are in place?

**Question4** Will the trucking of fill, house removal and demolition occur unofficially like the tree removal?

**Question 5** Will Hull Rd only construction access and Locke Hts parking restrictions apply to the trucking of fill and house demolition/removal activities?

3. We are **concerned about dust** from construction activity and the constant accumulation mud and debris on the road’s surfaces.

**Question6** Will there be dust control measures be applied on site? Will additional street cleaning be assigned for the affected road surfaces?

Concerns and questions regarding the proposed plan for townhouses off Locke heights/Hull Road

3. We are concerned about **light pollution**.

**Question7** Do the plans include any efforts to minimize glare, reduce light trespass and eliminate night sky pollution such as **using dark sky compliant light fixtures/technology**?

4. We are concerned about **noise pollution**.

**Question 8** Will the developer use **acoustically engineered fencing** on both sides of the proposed new entry off Locke Heights into the property and also along the rear borders of all properties directly abutting the development?

5. We are concerned about **privacy**.

**Question 9** Do landscaping plans include a landscaped **privacy screen/ hedge** planted using an evergreen species, at least along the proposed Locke Hts entry and along the back yards?

6. We are **concerned about the removal of all the mature trees on the site**.

**Question 10** Do landscaping plans include planting new trees to replace those removed last fall?

7. We are **concerned about the condition of the Locke Heights Road surface**.

**Question 11** Are there plans after construction for re-surfacing Locke Heights? The road surface is in very poor shape now and the increased traffic and construction will only further degrade its condition.

8. We are concerned about **Hull Road pedestrian safety**.

**Question 12** Are there plans for the extension of the existing pedestrian sidewalks to outlet at both Head Street and to a proper crosswalk at the lights at Caradoc Street? (Hull Road is very unsafe for pedestrians due to the blind hills, the narrow shoulders, and the dangerous speeding issue. This development will increase pedestrian activity along Hull Road. This safety issue has recently been compounded by the increase in children activity and on-street parking (commonly 9-10 cars) by the London Children's Aid group home on Hull Road.)

9. We are concerned about **speeding, dangerous driving that occurs frequently along Hull Road**.

**Question 13.** Are there any traffic calming measures being considered to reduce speeding on Hull Road?

#### **Other Questions**

**Question 14.** Does the existing infrastructure (storm sewer, sanitary sewers, etc) of Locke Heights, Hull Road have sufficient capacity to handle 26 new housing units?

**Question 15.** When the project is complete will there be emergency access off Hull road (a drive through knock-down type barrier for emergency services?)

**Question 16.** Will services along Locke Heights or Hull Road be disrupted at any point during construction? (Will there be street closures, power outages?)

**Question 17.** Will Locke Heights residences be on temporary water lines?

**Question 18.** Could the project be reconfigured to have the primary access off Hull Road whereby Locke Heights could become emergency access only after the services are connected?

**Question19.** What is the proposed time frame for the project (start/completion dates)?

**Question 20** When will house(s) demolition/ removal occur?

**Question21** When will the trucking and site preparations recommence?

**Question22** Are there plans for upgrading Hull Road? (Hull Road is deteriorating badly and seems to be breaking down or slumping to the south ditch. Will it stand up to the pounding of the construction traffic and the increased vehicular traffic post development?)

**Question 23** Are there plans to have Hull Road upgraded from a "lane" to a "street".

**Thankyou**

**Patty and Jack Parker**

## **Jim Ferguson, April 10, 2024**

Good Morning Jennifer, Tim, Cindy, Mayor Grantham, Deputy Mayor McGuire, Councillor's Hipple, Kennes, Brennan, Pelkman, Derbyshire, Pammer, and Willsie.

I request that you please read the Following concerns and questions about The proposed development by Gold Leaf Properties on Hull Road/Locke Heights in Strathroy.

Firstly, most of you know me but I will take a moment to introduce myself.

My name is Jim Fergusson and I have been a resident of Strathroy-Caradoc since 1987. My education is in Plans Review, The Ontario Building Code and The Ontario Fire Code. I Graduated from Fire Protection Engineering at Seneca College in Toronto. (2001) My family operates Langs Bus Lines Limited. My current position includes overseeing a fleet of 180 Buses, approximately 200 employees, and managing all our facilities. I have been a volunteer on the Fire Department in Strathroy for 21 years and am currently the Deputy District Chief at station 1, as well as an adjunct instructor with the Ontario Fire College Specializing in Live Fire and Pumper Operations. I am a director for the Bluewater Hawks Girls Hockey Association and have coached over 20 hockey teams in the last 15 years, for both the Strathroy Minor Hockey Association and the Bluewater Hawks Girls Association. I mention all of this to show you that I am an active participant in our community and understand there are processes and procedures that need to be followed to achieve the best possible outcome in every situation.

I am a current resident of Locke Heights in Strathroy-Caradoc. I lived here for 11 years with my parents, and then bought a house of my own, which I have lived in for 17 years.

I have some concerns regarding the proposed development off Locke Heights. I am going to list those below in hopes that you can review these and perhaps shed some light on my many questions.

After reviewing the Traffic Impact Brief, here are our concerns:

1. The traffic survey submitted by Gold Leaf is not an accurate survey as they claim. It was a Traffic Impact Brief by a consultant who made one site visit. (Stating this was a traffic Survey in the Meeting was a deliberate attempt to mislead)
  - a) I understand they state that based on a mathematical equation this development is only adding between 10-16 trips "peak time" trips per day. I am assuming they imputed data such as rural community, lack of safe pedestrian access to health services, shopping etc., employment status of residents, and vehicles per household. Otherwise, I do not think that those numbers can be considered accurate. This development is offering 63 parking spaces. Currently we have 47 Cars on Locke Heights adding a potential 63 is a 134% increase in vehicle Traffic.

- b) "Based on observations during our site visit, we would estimate that the existing two-way traffic volumes on Hull Road at Locke Heights are well below 200 vehicles during the peak hour, with approximately 10% turning to/from Locke Heights. As such, there are no concerns about existing traffic capacity or operations on these local roads." This was done on a Tuesday but does not state what time of day. How can we know that this is a proper estimate?
  - c) What was the traffic count? Was a counter installed on the road? Did they have someone monitor speeds? Did they observe to see how much pedestrian traffic is on hull road?
  - d) How do we get a proper traffic survey done of both Hull Rd and Locke Heights?
  - e) We do not believe that Hull Road is able to accommodate 200 vehicles during peak hours due to its width and limited visibility. Also, this does not take into consideration the pedestrian traffic. Adding more vehicles and pedestrians to Hull Road is a valid safety concern.
  - f) I did a google street view from Caradoc Street to Head street. (approximately 1 minute travel time) Here is what is what I observed.
    - i. 1 person on shoulder trimming grass
    - ii. 1 person riding a scooter on the road
    - iii. 1 white SUV traveling eastbound from Caradoc Street
    - iv. 1 Black truck traveling westbound
    - v. 1 White car eastbound turning onto head street
    - vi. If you pan the camera back towards Locke Heights you will see another white vehicle has entered the roadway and is traveling westbound
    - vii. 1 Google earth vehicle traveling eastbound
    - viii. So in 1 minute 5 vehicles and 2 pedestrians are on this road in this snapshot in time. So under the traffic impact brief theory that would conclude Hull road has 300 vehicles per hour and 120 pedestrians per hour.
2. I am requesting a 3rd party independent peer review. This should be contracted by the Municipality and charged to the developer for Hull Road and Locke Heights. This should include
- a. current road conditions
  - b. What the road is currently designed for?
  - c. Is there a weight restriction? (the road had posted no trucks a couple of years ago but have been removed)
  - d. A true traffic study.
  - e. A true estimate of the increased traffic load based on what this actually is. (R3 townhouses or R4 Lifestyle community for seniors).
  - f. An Independent review of sewer and water and if it is capable of handling the increase.
  - g. The recommendations on what Hull Road and Locke Heights should look Like to handle this development and what is currently there. Eg. Site Lines improved, Road Widened, Sidewalks, Curbs, Sewers etc. This developer is not being up front with us and has proven this in the submittal documents and in the first meeting.
  - h. I would also like the study to show what options would make hull road a viable entrance.

#### Regarding the Planning Justification Report

First off, we have a hard time believing a lot of what is written. It does not even appear that this document was proof read. We are not Strathroy Caradoc. They also reference this as a 21 unit, 26 unit, 32 unit 216 unit and a 76 unit development. This is not even considering that the engineer could not figure out how to use his tablet stand or tablet during our zoom meeting. (his camera image was sideways and he could not figure out how to straighten it)

In the executive summary they state that the Sanitary sewer, storm water sewer and water supply will come from Hull Road. Can the services be accessed from Hull Road or is Locke Heights the plan?

They site Volkswagen and Amazon plants as reasons for more residential and growth. Agreed that this may cause more growth in Strathroy, but this plan is geared to retired seniors. If we need housing for employed persons and this is why we need to build this 21/26/32/76/216 unit development, than the traffic statement *"Their conclusions are that there will be no discernable impact on the operation of Locke Heights given the few traffic trips anticipated from this geared to seniors development"* cannot be true.

We would like to understand why an environmental study is not required. The developer produced their own report stating that the flood plain and hazard area is no longer an issue. I appreciate that, but do we not feel that this may be slightly biased as it was paid for by the company that needs this removed to develop the land. The land was also deemed as a Natural Heritage zone, due to its proximity to the ravine and flood plains. How is it possible that building a however many townhouse subdivision does not effect this? The Strathroy Official Plan 5.3.2 - NATURAL HERITAGE states *"Natural heritage features in the rural area of the Municipality comprise wetlands, woodlands, valleylands, fish habitat, wildlife habitat and habitat of endangered or threatened species. Areas designated as 'Wetlands' may also include adjacent lands and small isolated pockets which do not constitute wetlands as defined; yet are considered an integral part of the wetland complex. These areas are regulated by Conservation Authorities. Natural heritage features warrant protection on account of their ecological and social value as well as their contribution to the natural landscape and the rural character of the Municipality. **It is intended that they be protected, wherever possible, from incompatible development, site alteration, and other activities that would undermine their integrity. It is also intended that such features shall be left in their natural or undisturbed state and that any adjacent land use or land use activity be controlled so as not to adversely impact on the natural and ecological integrity of the feature.**"*

Clearly there are protected species in this area. Understood that they did an assessment that the pre-existing structures are not being used as a roosting habitat for bats. But will the development of the land not disrupt them. How can they determine this with no environmental study?

I would Request a true environmental study be done on this property.(3<sup>rd</sup> Party Independent)

We are a bit concerned about the zoning requests. Throughout the document they state that they are requesting a change to an R3 zone, but on page 10 they reference the official plan as that of a lifestyle community which is an R4 zone. It should be zoned for what it is. R4 zones require direct connections to an arterial road as well a street with sidewalks, which Locke Heights does not provide.

When looking at section 9.2 Middlesex County Official Plan subsection 2.4.2 Transportation System *"The Location on the north side of Hull Rd and west side of Locke Heights is walking distance from downtown"*.

We agree this is within walking distance of downtown. But it is not a safe walking distance. To the East you have the corner of Hull and Head st. This is extremely narrow with no sidewalk, which gives pedestrians no choice but to walk on private property on uneven ground. To the West towards Caradoc st. The Traffic Impact Brief states *"Hull Road is a two-lane local road running east-west with an assumed (unposted) speed limit of 50 km/h. Hull Road has a semi-rural cross-section (no curb and gutter) and the only existing sidewalk is on the north side of Hull Road between Locke Heights and*

*Penny Lane. There are no signed parking restrictions on Hull Road.”* It is also acknowledged that this direction has limited visibility and blind spots as well as is very narrow. We are not clear how it can be advertised that this is within walking distance when there is no safe way to walk there.

In section 2.4.2.1 Transportation Hierarchy the statement *“This is compatible with surrounding development as evidence by the low number of **anticipated** trips both morning and evening noting this is a seniors development that mostly have no work-related travel”*. The average age of retirement in Ontario is 65, with many seniors still working full or part time jobs. Unless they plan on not renting to employed persons this is not a fair statement.

We did have a zoom meeting on April 3<sup>rd</sup>, 2024. We were very unsatisfied with lack of answers that were provided. Why is access off Hull Road no longer feasible. Is it because it would cut into their profit? Their original plans and even the name of the complex was Hull Road Development. We would like to offer a few suggestions as to how to make the entrance to this more feasible to enter off Hull Road

1. Make Hull Road a one way from west to East.
  - This would eliminate the line of site issue.
  - It would allow the road to be narrower and give room for sidewalks to be added
  - Traffic calming measures could be put in place to slow traffic
  - A bike lane could also be put in place
2. Make it a 3 way stop at Hull and Locke Heights.
  - Eliminates the line of site issue which the developer stated is the reason for having to enter off Locke Heights.
  - Could potentially reduce the amount of traffic on this road as people may not use it as a quick through-way from Head St to the other side of town. Or at least it would slow it down before it gets into the narrower, hillier area.
3. Make Hull road a dead end road by ending it at Locke Heights.
  - You could still access both sides from either Head St or Caradoc St. Anyone living at Locke Heights and to the West would only have access from Caradoc St, and Anyone to the East of Locke Heights would have access from Head St.
  - This stops all through traffic on an underdeveloped road and eliminates the need to spend money on it.

Also, having the Engineer disregard our concerns regarding the Hull Road traffic and safety issues was insulting. Stating that he understood the traffic issues on Hull Road because he jogged down it during gym class in 1976 was an asinine comment. He is correct the road itself has not changed. Most of the homes on Locke Heights and Pittao Place were not even in existence. In fact the population of Strathroy itself has increased by over 150% in that time.

We do not completely object to the development of 26 single level condos off Hull Road. Not to say we wouldn't be ecstatic if it wasn't happening, but we do understand that the property was bought with the intention of development. We are happy that the plan is for single story, senior residence rental properties. What we want is for this to not negatively impact our housing values or safety. There seems to be a lot of concessions that need to be made for this development to happen off Locke Heights, when in fact it is just as feasible to have this off Hull Road. But this would be at the financial expense of the developer not the residents or the municipality.

To conclude, Gold Leaf developments build beautiful well-maintained complexes. They are needed and certainly have their place in the community. This complex although not desired would be better received if done correctly.

Concession the builder wants:

- They want R3 zoning when it should be R4.
- They want to enter on a dead-end street when Strathroy-Caradoc says these developments should be on arterial roads.
- They want to attach this development to a street with no sidewalks Strathroy-Caradoc Planning states they need sidewalks on the road they are attaching to.
- They want to remove the Heritage Zoning that protects that area. We realize that they do not need permission to remove trees from their land, but it seems there was no consideration given to how the loss of 30 established trees may affect this area.
- They want to make something fit where it does not. Hull Road and Locke Heights are not able to accommodate this build as they stand now. If the Municipality is not prepared to repair Hull Road to ensure the safety of their residence, then there are clearly only 2 options. The development cannot go in, or the repairs need to be made at the developer's expense. It is not reasonable to approve a development in the middle of a field and then expect the town to run a road to it. Why can they build a development on an unfit road and expect the town to upgrade the road.

Our major concerns:

- The current infrastructure on Hull Road was put in place for Hull Road and Locke Heights. Since then, Pittao Place was added and now they want to add 26 more residences to this existing, aging infrastructure.
- They say entering on Hull Rd is not feasible because of site lines. We gave 3 solutions to this problem above.
- Creating an entrance on Locke Heights poses the following issues:
  - Devalues the two neighbouring properties to 6 Locke Heights as now they have a road traveling beside their houses.
  - Devalues the two properties across from the entrance (5 and 7) as now they have headlights shining into their bedroom windows whenever a vehicle leaves the Community.
  - Devalues every house on the street. The increased traffic, taxing on the services, light pollution, noise pollution etc.
  - Changes the intended design and use of the street. Each person purchased a home on that street because it is a quiet street with no traffic. That is being taken away by this development. It seems unreasonable that this is at our cost not his.
  - This street has been an amazing street for kids to grow up, play, learn to ride bikes, play street hockey and be kids. We will lose all of that as we do not have sidewalks to compensate for the increased traffic this development will bring.



**Figure 1.0 Hull road Eastbound The proposed community would be between the two driveways on the left in this picture.**

Notice how far over the SUV must travel to avoid the person on the shoulder. This makes the road unsafe for pedestrians, when taking into account the poor site lines, the chance that there could be 2 cars travelling in opposite directions at the same time, as well as that there are no flat shoulders to walk on.

Is this the towns responsibility to put sidewalks in? Yes. Or they can say no to the development or make the developer responsible for ensuring safe pedestrian and vehicular traffic.

The fact that no sidewalks are present is a danger and an issue with Hull road. But it is a legacy problem. The current residents do not like it, but it is what it is. Why would the municipality add 26 senior residences into this mix.



**Figure 2.0 Hull Road Eastbound directly in front of proposed development.**

As you can see the road is narrow, has alligator cracks, no sidewalks or storm drains, and is in poor overall condition. This road is not fit for the current traffic level let alone adding more vehicles.

**Crocodile cracking** (also called **alligator cracking** and perhaps misleadingly **fatigue cracking**) is a common type of distress in [asphalt pavement](#). The following is more closely related to [fatigue cracking](#) which is characterized by interconnecting or interlaced cracking in the asphalt layer resembling the hide of a [crocodile](#).<sup>[1]</sup> Cell sizes can vary in size up to 300 millimetres (12 in) across, but are typically less than 150 millimetres (5.9 in) across. Fatigue cracking is generally a loading failure,<sup>[1]</sup> but numerous factors can contribute to it. It is often a sign of sub-base failure, poor [drainage](#), or repeated over-loadings. It is important to prevent fatigue cracking, and repair as soon as possible, as advanced cases can be very costly to repair and can lead to formation of [potholes](#) or premature pavement failure.

Thank you for your time.

I look forward to the answers to my questions.

## Patti and Rayner Krista, April 28, 2024

April 28,2024

Dear Mr. Williams, Members of Town Council and the Planning Department:

We are writing in regard to Application No. OPA2-2024 (OPA20) and ZBA4-2024 pertaining to subject lands 100/101 Hull Road and 6 Locke Heights, Strathroy.

We are opposed to this application by Goldleaf Properties and feel approval for any development on these lands should be denied until Hull Road meets all urban standards and is safe for all current and future users. Furthermore, Hull Road should be improved to provide the primary access and services for this development. Access should not be provided to this Goldleaf development by demolishing the house at 6 Locke Heights and negatively altering the Locke Heights neighborhood. Zoning standards including the minimum rear yard setback and what the "common outdoor amenity area" should include are determined based on municipalities policies and objectives of how land is to be used and should not be altered to accommodate this development.

Our detailed list of concerns and questions regarding the development, site preparations and construction for proposed senior townhouses off Locke Heights/Hull Road are as follows:

- 1) Hull Road is an extremely narrow older road without concrete curbs and with the exception of the sidewalk between Locke Heights and Penny Lane **has no sidewalks**. It is very challenging to walk along this road as one spends their time jumping on people's lawns to avoid the cars (many who are speeding). The Town should not be increasing the number of people using this road whether it be by foot or car until Hull Road meets all urban standards including wider paved shoulders, improved road surface, curbs, gutters, drainage and sidewalks. **How can Council and the Planning Department approve and support this development of senior townhomes without sidewalks. These new residents and the current residents of the Hull/Locke Heights area should be able to walk safely to downtown/Superstore without walking on the road.**
- 2) Locke Heights is a cul de sac with 21 homes. Personally we have been residents and taxpayers for 28 years and chose to raise our family on this quiet street ZONED RESIDENTIAL with no sidewalks as the residents always took care to drive responsibly and watch out for the children. Unfortunately, the proposed demolition of the house at 6 Locke Heights and providing access to the Hull Road townhouse development will negatively impact our Locke Heights neighborhood. Traffic capacity on Locke Heights is already at maximum volumes with 47 vehicles and will be more than doubled with the proposed 26 unit development, thereby making the area not as safe for seniors and families with young children including us who have young grandchildren visiting on a regular basis.
- 3) The initial development proposal referred to as Riverview Ridge Estates and posted for several years to the Goldleaf Properties website was for 20 seniors' townhouses to be built with access from Hull Road. When the developer was asked at the April 10, 2024, virtual meeting why the proposed entrance to this development was now off of Locke Heights and not Hull Road they stated that an entranceway off of Hull Road **was not feasible** but had no answer as to why not feasible. Why is access off of Locke Heights feasible when Locke Heights is currently zoned residential, and houses occupy each lot on the street? Why would Council agree to allowing a house to be demolished and zoning changed in order to accommodate this entrance off of Locke Heights when there is ample frontage off of Hull Road for an entrance road? In fact, the proposed site plan has the interior roads of the complex going almost to Hull Road but just not intersecting it.
- 4) The proposed development in our opinion is a "lifestyle community" which according to the Strathroy- Caradoc Official Plan should be directly accessible to an arterial or collector road. I would not consider Locke Heights meeting these criteria.

- 5) With the proposed development having its entranceway from Locke Heights, I am very concerned about the setback supplied for the houses located on either side of 6 Locke Heights. The proposed entranceway road for 6 Locke Heights is far too close to the neighboring houses. In fact, if weather was bad and someone was driving and slid, they could hit either house especially the new house to the left of 6 Locke Heights. Please note the Location Map provided by Strathroy-Caradoc with the Notice of Applications and Public Meeting is misleading as it shows vacant land to the left of 6 Locke Heights. This is not accurate as the land is occupied by a house. There is currently no vacant land on Locke Heights.
- 6) What type of compensation will be provided to owners of properties on Locke Heights who are impacted and have their property values decreased if access to the new development is allowed from Locke Heights. All Locke Heights residents purchased properties on a quiet cul de sac zoned residential with no through street. Many of us have lived on the street for years, paid our taxes like "good citizens" and if this entranceway is allowed, we will see our values decline (especially those property owners directly impacted)
- 7) Who owns this new access road if approved from Locke Heights and who is responsible for snow removal? Where will the accumulated snow be placed? Not fair or safe to those houses directly bordering the access road to have snow pushed against their properties. In addition, the noise and disruption with a snow plough within 10 feet of your house is definitely not a positive experience.
- 8) Is garbage collection going to have trucks entering via proposed Locke Heights entrance?
- 9) We have significant concerns regarding **access and safety** due to contractors and subcontractors parking equipment, trucks, trailers, receiving construction materials along both sides of Locke Heights. Construction site access should be limited to a dedicated construction access off Hull Road only and must be carefully monitored for safety. Locke Heights has no sidewalks and pedestrians and children walking to the bus stop must use the road. Therefore, it is not safe, and the town's liability increases significantly if Locke Heights were to be used to access this development and an accident occurred. Hull Road has no sidewalks either so access must be closely monitored and both streets should not be used for contractors etc. to park their vehicles.
- 10) Developer is proposing to widen the road in front of their property on Hull Road. What does that mean for the neighboring Hull Street properties. Is there an impact?
- 11) How will we ensure there is minimal disruption to the homeowners on Locke Heights/Hull Road in the demolition/moving of the houses on Hull Road and 6 Locke Heights?
- 12) How will the trucking of the significantly large quantity of fill for the changes proposed in the grading especially for units closer to Hull Road (ex units 10,11,12 and 13). This is a safety concern and very hard on the existing road infrastructure. The property is hilly so we know a lot of fill will be required but developer had no idea of the quantity when asked how much at the virtual meeting. Also what is the impact on the neighboring properties of the runoff with the extensive grading required for this development?
- 13) With the amount of fill and grading required there will be significant vibrations felt by the Locke Heights neighborhood. The recent grading and excavation work done for the condo development off of Head Street caused significant vibrations to our Locke Heights house and we are located several blocks away from the Head Street development.
- 14) We are **concerned about dust** from construction activity and the constant accumulation of mud and debris on the road's surfaces. How will this be handled and will dust control measures be applied on site?
- 15) We are concerned about **light pollution**. Do the plans include any efforts to minimize glare, reduce light trespass and eliminate night sky pollution such as **using dark sky compliant light fixtures/technology**? For example, the houses directly across from proposed access road on Locke Heights will have car lights shining in their front windows from carts utilizing this new access road.
- 16) Both Hull Road and Locke Heights have minimal streetlights. Will the number of streetlights be increased to improve visibility if this proposed development proceeds.
- 17) We are also very concerned about **noise pollution**. Will the developer use **acoustically engineered fencing** on both sides of the proposed new entry off Locke Heights into the property and also along the rear borders of all

- properties directly abutting the development? Who will pay for the initial construction and future maintenance and replacement of this fencing when necessary? Do homeowners have a say in what type of fencing is used?
- 18) We are concerned about **privacy**. Do landscaping plans include a landscaped **privacy screen/ hedge** planted using an evergreen species, at least along the proposed Locke Hts entry and along the back yards of impacted Locke Heights property owners?
  - 19) If access to this development is approved to be off of Locke Heights what plans after construction are there for re-surfacing Locke Heights? The road surface is currently in very poor shape now and the increased traffic and construction will only further degrade its condition. The road was built for 21 houses not close to 50!!
  - 20) Does the existing infrastructure (storm sewer, sanitary sewers, etc.) of Locke Heights, Hull Road have sufficient capacity to handle 26 new housing units? If not, is developer paying for upgrade?
  - 21) If residents on Locke Heights experience sewer issues after completion of this project and the issue can be traced to the development who is responsible to pay?
  - 22) Will services along Locke Heights or Hull Road be disrupted at any point during construction? (Will there be street closures, power outages, lack of internet?)
  - 23) Will the builder of the development conduct an Archaeological Assessment before disturbing the areas as was done for Enbridge – Middlesex County (Stage 1 Archaeological Assessment London Lines Replacement project 2020-07-10 Stantec consulting London, Ontario)
  - 24) The creek adjacent to the proposed development is a spiny softshell turtle habitat as identified by the province of Ontario. As a result, will an environmental assessment be conducted?
  - 25) How much is this proposed development going to cost the taxpayers?

In conclusion, we think it is evident that the use of Locke Heights as the access to the Goldleaf development is not feasible. This proposed Goldleaf development should be delayed and altered until Hull Road is upgraded to a) be a safe and serviced road and b) provide the **ONLY** access for the Goldleaf development from Hull Road.

Sincerely,

Patti and Rayner Krista

**Jack Parker, May 1, 2024**

**To express a concern regarding the application by Goldleaf Properties to build a 26-unit seniors townhouse development at 101 Hull Road. Application No. OPA2-2024 and ZBA4-2024**

The current proposal by Goldleaf Properties for a seniors complex of 26 units along in the Locke Heights/ Hull Road area will increase traffic, pedestrian and cyclist use along Hull Road thereby increasing the risk of personal injury occurring due to deficiencies of Hull Road as previous municipal study has identified. (EPW 18-017)

I was recently on my morning walk along the Hull Road when my presence on the roadway coincided with two cars passing. I was forced to step off the road surface down into the ditch to avoid injury as this section of the road has no shoulder at all. One of the two drivers rolled his window down and apologized as he drove by. My recent experience on Hull Road ended on a friendly note, unfortunately this is a different scenario on icy roads with snowbanks at night in January when two youths walking abreast with earbuds and cell phones in hand encounter two less attentive car drivers. The big safety issue here occurs when two cars must pass simultaneous to the presence of pedestrians who become stranded on the road surface with no shoulders or sidewalks allowing them to step out of the way and avoid collision.

I believe the potential for pedestrian injury or fatality is currently very real along Hull Road. My neighbour walks to work each morning along this road, the lady across the street walks to the superstore along this road, and youths and their adult care givers from the London Childrens Aid group home that operates on Hull Road commonly walk, cycle, and use their scooters along this section of Hull Road.



7:50am April 8,2024

Pedestrian use is increasing along Hull Road which currently is a narrow road with blind spots, no sidewalk and little or no shoulder along this portion of the street and no pedestrian crosswalk at the traffic lights.



7:00pm April 8,2024

The neighborhood is changing, there is increased pedestrian and cyclist activity on a daily basis along Hull Road. This photo is taken looking west from the mouth of Locke Heights and these pedestrians and cyclists are essentially in a blind spot just below the crest of the hill. They are not walking against opposing traffic. Minutes earlier sunlight could have impaired the vision of the oncoming westbound motorist.

In the unfortunate event that injury should occur along Hull Road it is conceivable that legal counsel hired by an injured party would be interested to read the municipal report EPW18-017 from July 16,2018 which states;



## COUNCIL REPORT

**Meeting date:** July 16, 2018  
**Department:** Engineering & Public Works  
**Prepared by:** George Elliott, P.Eng., Director of Engineering & Public Works  
**Reviewed by:** Greg McClinchey, Chief Administrative Officer  
**SUBJECT:** Hull Road Traffic Concerns  
Report No. EPW 18-017

1. **“Existing Road Conditions-** Hull Road is a narrow older road”
2. **“Improvements Warranted-** The roadway corridor should be improved with the addition of pedestrian and cyclist facilities.”
3. “Hull Road is the type of past semi-urban road that **is in need of reconstruction** to a full urban standard.”
4. “The volume of pedestrians and cyclists on the street was not measured”

I am further concerned that the current proposal by Goldleaf Properties to build **a seniors complex** of 26 units along this section of Hull Road **will increase pedestrian and cyclist use on Hull Road** increasing the risks to pedestrians in this area as it fails to meet or adhere to the following municipal planning standards;

**Transportation Policies for New Developments Embedded within Strathroy-Caradoc's Official Plan** are detailed criteria for new developments, including requirements for pedestrian facilities on new streets. Where possible, **the Municipality is encouraged to introduce standards and policies requiring new developments to provide sidewalks on both side of the street in urban conditions and cycling routes along collectors and arterial roads,**

**Excerpt from Strathroy-Caradoc 2022 Transportation Master Plan 6.2.5 Sidewalks**

**Sidewalks are important infrastructure in community building and promoting active travel for all ages and abilities.** As part of the complete streets approach, sidewalks will be required on both sides of new arterial and collector roads and on at least one side of new local roads. **If the Municipality approves new condominium roads, sidewalks will be required on at least one side of the road.**

**Excerpt from Strathroy-Caradoc Official Plan – April 2018-2034**

**LIFESTYLE COMMUNITIES** a) Lifestyle communities (sometimes referred to as adult communities, 'gated' communities, land lease communities, mobile home parks, modular home parks, **retirement communities**) shall be considered in accordance with the following criteria and subject to an amendment to the Zoning By-law. b) **The 'community' shall be directly accessible to an arterial or collector road**

**I believe that municipal approval for a new development in this area should be contingent on correcting the safety deficiencies of Hull Road.**

Jack Parker

Kim Petrie, May 3, 2024

Kim Petrie

Strathroy, ON

May 3 2024

Strathroy Caradoc Mayor Grantham and Council,

I am not in favour of allowing access to 101 Hull Rd via Locke Heights cul-de-sac for development purposes. Additionally, and as mentioned in my June 2017 correspondence to the Mayor, Hull Rd is a safety risk. To think that adding substantial town population growth AND 26 more homes AND visitor parking will not increase pedestrian, school bus and traffic risk substantially is inconceivable. I am shocked that a plan to add this amount of traffic to Locke Heights cul-de-sac is a viable consideration for the proposed 101 Hull Rd development.

In response to my 2017 Hull Rd Safety concern, Strathroy Caradoc Council Report #EPW 18-017 states that *Hull Rd is in need of reconstruction to full urban standard*. I am not in favour of creating further safety risks or ruining a neighbourhood for profit of a private company at the taxpayer expense.

It seems that there's very little consideration regarding the destruction of our neighbourhood natural eco system including changes to previous surveyed drip lines and the very high likelihood of detrimental effects to endangered species and ravine wildlife. **Why is there no need for an environmental study as Gold Leaf reported at the Apr 3, 2024 open house meeting?**

Gold Leaf also stated that Hull Rd access to the development was not feasible. **Exactly what does "Hull Rd access not feasible" mean?**

It would be interesting to know the total loss in neighbourhood real estate value should Hull Rd remain without reconstruction and Locke Height access be approved. We have neighbours that paid for and chose to live on Locke Heights because there was little traffic and lots of nature and wildlife. They are now faced with a visitor parking lot and an access road to a 26 unit complex running past their bedroom window. **How would it be if this were happening to your quality of life and value of your home?**

Please do the right thing. Reconstruct Hull Rd prior to allowing development of 101 Hull. Stand up and make it right.

Answers to bolded questions above will be greatly appreciated.

Kim Petrie

**Abe Suderman, May 6, 2024**

Yes, this is a most important and needed project!!

Please allow this project to go ahead.

Abe Suderman

**Cassie Tamminga, May 6, 2024**

Esteemed Clerk,

I would like to have the Council address the following question:

What steps has the Applicant taken to ensure that the proposed amendments (intensifying the density of the residential zone and the reduction of the yard setback from 9 m to 2.29m) will not negatively impact the Water Body (as defined by Ontario Regulation 153/04) and Areas of Natural Significance (as defined by Ontario Regulation 153/04)?

If the Applicant has not done due diligence in assessing the environmental impact of the proposed changes, it behoves Council to deny the Applicant until the Applicant can demonstrate that the proposed amendments will not negatively impact the Water Body (as defined by Ontario Regulation 153/04) and Areas of Natural Significance (as defined by Ontario Regulation 153/04).

Cassie Tamminga

Property owner of 138 Hull Rd., Strathroy, N7G 3P2

**Art Clark, May 7, 2024**

Dear Mr. Williams,

I am writing this email to express my support for the proposed development by Gold Leaf Properties and provide some comments from the perspective of a Retired Professional Engineer with experience consulting for both Developers and Municipalities. My wife and I had planned to move into this development as it fits perfectly the housing requirements of a retired senior.

Due to circumstances and the passage of time, we have made other arrangements, but I have followed the project over the years and have reviewed the proposal as it now is submitted to the municipality.

I expect that neighbouring property owners will have the usual concerns of adjacent property owners.

My comments are as follows:

The type of residential development proposed has the lowest impact on adjacent residential properties. Units in a retirement community typically have one or two occupants. They don't tend to be rowdy, usually have only one vehicle, and are only active during off peak times. The result is a minimum impact on adjacent property.

The major modification in the present proposal is the relocation of the access to the property from Hull Road to Locke Hts. From a traffic safety perspective, this location is the better location. This allows for interaction between traffic from the development to take place at the existing intersection on Hull as opposed to a private entrance on Hull fairly close to the existing intersection. Access to Locke is located close to Hull, reducing the number of residences affected by any increase in traffic.

I don't know if anyone has suggested the development will lower property values, but I would point out that the present residential proposal will remove the unknown of having vacant developable property next to one's backyard.

Change is always met with resistance. When we moved to Strathroy over a decade ago, the property across the road was vacant with a proposal for single storey, 2 bedroom apartments. Residents were objecting to the proposal for many of the typical reasons. The Municipality looking into the future determined that the project was needed and it was approved and constructed. We arrived as construction started. I haven't heard any comments since from objectors saying "I told you so".

I hope the Council and Staff will look to the long term benefit that this project will bring to the municipality and approve the project.

One more point. I suggest that the Municipality include in the development agreement an undertaking by the developer to minimize construction access from Locke and utilize access from Hull.

Yours Sincerely,

A. W. Clark P.Eng. Ret.

**Nancy Langs, May 8, 2024**

RE: PUBLIC MEETING

CONCERNS:

Originally Gold Leaf Properties had the entrance off of Hull Road with 21 Units. Now they want to demolish a home on Locke Heights and build 26 units.

Safety:

Locke Heights was designed for traffic for 21 homes. People purchased homes on this street because it is quiet and has minimal traffic. Many owners have small children and with 26 units it will create twice as much traffic. The couple that own the house across from the new proposal have two small children and will continually have vehicles headlights shining in their windows. Now they are concerned about their children's safety and their property value.

Hull Road::

I walk on Hull Road daily with my dog. The road is nothing but a cow path. It is narrow and it is impossible to walk on the road if two cars are passing each other. I have had to dive out of the way on numerous occasions. Now I walk on peoples lawns which owners do not appreciate.

Hull Road is dangerous, narrow and the pavement will not stand up to heavy trucks. There used to be a sign saying no trucks but it has vanished.

ZOOM MEETING:

Many of us were very disappointed with the meeting. They told us about the beautiful units but sidestepped so many questions

When someone said that Hull Road was dangerous his reply was he jogged on it regularly in 1976 and it was no problem. He also commented that no one has been killed.

Do we have to have someone severely injured or killed to prove it is dangerous?

They continually said the town is responsible

When they tear up our roads, who will pay for the repair? That's the towns problem

If someone gets injured on Hull Road - "Thats the Towns problem

They advertise in their promo that it is walking distance to many amenities but I would not recommend walking on Hull Road.

They want to be friendly neighbours?

Please do not pass this without updating Hull Road

Nancy Langs - 20 Locke Heights-



Public Meeting Notice of Application No. OPA2-2024 (OPA 20) and ZBA4-2024

Applicant: Anthony Gubbels LDS Consultants Inc., for Gold Leaf Properties Inc.

Property: 101 Hull Road and 6 Locke Heights

Municipality of Strathroy-Caradoc  
52 Front Street  
Strathroy, ON. N7G 2R4

Dear Council and Mayor:

We, Ross and Jane Henderson, and Rob and Jayne Waters, wish to submit the following comments and concerns to Council with regard to the proposed development.

We will use this letter to address the various reports provided by the agent for Gold Leaf Properties.

1. Planning Justification Report – This document prepared by Knutson Development Consultants Inc. is dated January, 2024. Since it is a somewhat general document being a Planning Justification Report, we will refer to Sections which cause us concern. Some of these concerns are minor, such as typographical errors in Paragraph 3.0 Benefits of Proposed Development, it quotes 216 unit townhouse development. It indicates it is geared to senior citizens as rental accommodation, although previously, in Applications, they had mentioned condominiums.
2. Paragraph 4 states “the development will be serviced by full municipal services”.
3. Paragraph 5 of the Justification Report indicates that in preconsultation review Hazard Land designation was reviewed and that the St. Clair Region Conservation Authority have agreed to the proposal submitted as “floodline and backwater analysis”. In essence, the developer has provided a flood hazard assessment to the St. Clair Region Conservation Authority in 2023, which, it appears, the St. Clair Region has signed off. Removing Hazard Land designation from part of the property as a result of engineering to prevent water flows from the development which is using fill in the area which previously was designated as Hazard Land.
4. There is some concern with regard to Paragraph 9.0, Policy Documents and Zoning, in that the Paragraph 9.1 indicates a 21 unit one floor townhouse development, but the Application generally relates to 26 units.
5. In addition, in Page 5 at the bottom, it stated “the proposed project is on full municipal and sanitary sewer and water. The stormwater management is accommodated on site through on site orifice restrictions to ensure post development flow are less than the pre-development storage, thus not requiring additional infrastructure.” We disagree that this on site work will not require additional infrastructure.
6. We also disagree with Section 1.6.6.7 on page 6 of the Planning Justification Report, as we do not believe the systems proposed will be viable over the long term.
7. Section 9.2, Middlesex County Official Plan also is confusing. We assume that in the first paragraph on page 6, it states “216” unit townhouse development, which we assume, is actually a 26 unit.
8. Finally, within this Section under General Policies, 2.3.7 Housing Policies, Paragraph D, the provision of housing for special needs groups. This project is based on a provision of rental seniors housing, which will lead to further comments.

9. We disagree with regard to comments regarding Intensification and Redevelopment 2.3.7.3 where it states in the final sentence, "traffic has been studied and found to have no operational issues with local traffic." We will raise this issue later.
10. But mostly we disagree with 2.4.2.1 Transportation Hierarchy, as Hull Road is less than a standard road and has already difficulties which we will describe further. We note that under Section 9.5, there will be a Flood Plain change in mapping and this, in our opinion, will need to be reflected in Site Plan Approval, Paragraph 10, with additional obligations being added to the developer in connection with site plan approval.

Public Meeting Notice of Application No. OPA2-2024 (OPA 20) and ZBA4-2024

Applicant: Anthony Gubbels LDS Consultants Inc., for Gold Leaf Properties Inc.

Property: 101 Hull Road and 6 Locke Heights

Municipality of Strathroy-Caradoc  
52 Front Street  
Strathroy, ON. N7G 2R4

Dear Council and Mayor:

Traffic Impact Brief from Strik Baldinelli & Moniz, dated February 9, 2024

We take the position that by limiting the Brief only to the site and Locke Heights, but explicitly avoiding issues with Hull Road, the Traffic Brief is totally deficient.

At the exit of Locke Heights, Hull Road itself, being a forced road, is only 10 meters in width. Previous severances have occurred giving a further 5 meters on the frontage of properties on either side of Locke Heights. This 5 meter road widening is also proposed in the site plan for this development. However, this leaves a reduced Hull Road which we acknowledge has been there for decades of 15 meters in the vicinity of the built up portion of the project and its retaining wall. Given that the project is centering on seniors, we assume that Hull Road, with minimum sidewalks, Locke Heights sidewalks and dangerous grading in front of the development where the retaining wall is to be placed, will lead to issues for seniors, not necessarily driving but walking, as many seniors plan to do for exercise.

We disagree with the following "no improvements to external road network are required to accommodate the proposed development, however, we suggest consideration be given to prohibiting on street parking along the east side of Locke Heights between Hull Road and the proposed site access."

The lack of past planning of Hull Road and the topography of Hull Road has to be taken into account when we are dealing with a development for seniors. Council should be aware, in the past, that the portion of Hull Road beyond the entrance of Locke Heights heading west was used for soap box derbys in the past. We can attach as an Exhibit, a 1980 soap box derby description.

extension of the Stokman drain immediately south of Hull Road adding to backwater effect at Kittridge Avenue East. Another drain, the Cuddy Drain also has an effect: portions of the Cuddy Drain which was put underground and along Head Street North, but, at Pannell Lane, swales were created after the movement of the drain to Head Street across various properties at Abigail Street, Pannell Lane, as shown on the attached mapping. These swales, of course, will be mostly dealing with storm events but they change the volume of water and cause us concern as to the outlets on the north side of Hull road and the north side of Kittridge.

Under Existing Conditions in the report, LDS does a desktop investigation using peak flow for Hurricane Hazel claiming that the existing Stokman Drain near Mullifarry Drive/Second Street, was used in this analysis but not these two other drains. There are errors in the report under Existing Conditions.

Under Backwater Effect Analysis, LDS claims under Figure 3, page 2, "our analysis has determined that the current flood elevation is over estimated for the subject portion of Stokman Drain corridor" leaving out of course these other drains mentioned above.

The LDS Report on page 3 disputes the previous report of Fenco McLaren Inc. Regarding higher flow rates, but given the addition of the Paine Drain and the remnants of the Cuddy Drain, we must dispute this. However, our larger problem relates to the fact that most of the water (We enclose a picture of flooding that occurred on Hull Road.) does not access the culvert at Hull Road on the Stokman Drain Extension. (See Appendix.) Photos which were taken show water crossing Hull road in the area where fill is to be directed.

There is also a culvert, which we assume, flows water from the corner of Locke Heights into the area immediately across Hull Road from the retaining wall and road widening.

We foresee the potential for icy situations on any sidewalk being built in the road widening by the developer because of lack of drainage across Hull Road.

An investigation showed a culvert which appears to flow from the intersection of Locke Heights and Hull Road into the area owned by Cassie E. Tamminga and Richard J. Tamminga at 138 Hull Road. This water and the water overflowing Hull Road empties into that area and continues into the area owned by Leigh Farrar and Brandon Cassell at 77 Kittridge Avenue East. It then travels into property owned by David M. Desrosiers and Cindy A. R. Derosiers at 31 Kittridge Avenue East.

Our own investigations indicate that there could be an impact with this water not being properly released from the wetlands area and backing up onto our properties being that of Ross and Jane Henderson at 23 Kittridge Avenue East and Rob and Jayne Waters at 7 Kittridge Avenue East.

On a site investigation, we noted a watercourse just at the edge of Kittridge Avenue entering from what we presume are the Tamminga, Farrar/Cassell, and Desrosier

properties. This watercourse should be dealt with and it does not provide, at this time, a proper outlet for the water coming over Hull Road and the Locke Heights storm drain.

**Recommendation:**

We propose that the Municipality authorize its Road Superintendent to request, through a petition, to remedy the draining of the water off Locke Heights and over the road from the proposed development into the Stokman/Paine/Cuddy Drain natural watercourses.

We further suggest that the drainage assessment in this matter be assessed to the Developer as part of the provisions of Section 41 of the Planning Act.

If this application is approved Strathroy-Caradoc should require a site plan from Gold Leaf Properties Inc. that includes, as a minimum, the following:

Under Section 41, subsection (7), Condition to Approval of Plans subsection (a) (4) walkways and walkway ramps, Section 4.1 Facilities Designed for the Accessibility for Persons Disabilities, i.e. seniors, Subsection 8, Easements conveyed to the Municipality for construction, maintenance, and improvements of the watercourses, ditches, land drainage works, ... and other public utilities through the Municipality and local boards that are upon the land. Sub 9, grading of alteration and elevation of the contours of the land, the provision of the disposal of storm surface and waste water from the land subject to the site plan.

**From:** Melissa Deisley <mdeisley@scrca.on.ca>

**Sent:** Wednesday, February 5, 2025 3:47 PM

**To:** Tim Williams <twilliams@middlesex.ca>

**Cc:** Shelby Campbell <scampbell@scrca.on.ca>

**Subject:** RE: OPA2-2024 & ZBA4-2024- 101 Hull Road \_ SCRCA Comments

PL#2019-084

Hi Tim,

Sorry for the delays on getting back to you on this one.

From our comments for the OPA/ZBA dated May 1, 2024, they should ensure that the top of bank is outlined on the plans and that all units are located greater than 6 metres from the top of bank (outside the erosion hazard limit), and the erosion hazard limit should be clearly identified on the plan. Units 18, 19, and 20 look to be closer than 6 metres from the top of bank, and the setbacks seem to be inconsistent compared to the topographic plan and cross sections in the geotechnical report (i.e. the erosion hazard limit is less than 6 metres from the top of bank in certain areas).

**Waters and Hendersons Letter, dated May 16, 2024 – SCRCA Comments**

Additionally, SCRCA reviewed the comments made by the Waters' and Hendersons, letter dated May 16, 2024. This does not change the recommendations in the letter prepared by SCRCA for the OPA and ZBA dated May 1, 2024.

In detail, our comments are as follows:

SCRCA reviewed both Ag-Maps

(<https://www.lioapplications.lrc.gov.on.ca/AgMaps/Index.html?viewer=AgMaps.AgMaps&locale=en-CA>) and our internal GIS system and both agree with the orientation and existence of Paine Drain Extension as identified in the letter prepared by the Waters and Hendersons. Ag-maps shows the Cuddy Drain running parallel to Head Street and outletting to the Sydenham River, whereas the Adelaide-Metcalf Map shows Cuddy drain connected to Stokeman Drain. The Adelaide-Metcalf & Ag-Maps don't outline the connected drain (Cuddy Drain) to the Stokeman Drain south of Hull Road, however in reviewing the aerial imagery, we can see that it exists and it is also identified on our internal GIS mapping.

The Paine Drain Extension is connected to the Stokeman Drain and was included in the drainage area determined by LDS. The peak flow was calculated based on the drainage area presented in the report. The Cuddy Drain is tiled and discharges into the Sydenham River through a separate outlet. The downstream part of the drain is located outside of the LDS' drainage area. The catchment area completed by LDS agrees with the Ontario Watershed Information Tool (OWIT) Drainage Area.

We do not see a culvert located at Locke Heights and Hull Road. Portions of all the properties mentioned (138 Hull Road, 77 Kittridge Ave, 31 Kittridge Ave, 23 Kittridge Ave, and 7 Kittridge Ave) are located within the flood fringe of the Sydenham River, and therefore are low-lying floodplain lands. There are no Provincially Significant Wetlands located on any of these properties.

The Municipality should address the swales related flooding issues. Our regulated area is related to fluvial flooding (river or riverine flooding: when levels in a river, creek or stream rise, allowing water to flow onto surrounding land), not the isolated depression flooding due to increased rainfall intensity. The Municipality should also address the concerns about icy situations due to lack of drainage concerns.

If you have any questions, please contact me to discuss,

Thank you,

Melissa

Melissa Deisley

Director of Planning & Regulations

## Attachment No. 4 – Notice of Completion / Notice of Public Meeting



### NOTICE OF APPLICATIONS AND PUBLIC MEETING

APPLICATION FOR OFFICIAL PLAN AMENDMENT AND ZONING BY-LAW AMENDMENT

APPLICATION NO.: OPA2-2024 (OPA20) and ZBA4-2024

APPLICANT/AGENT: Anthony Gubbels (LDS Consultants Inc) for Gold Leaf Properties

SUBJECT LANDS

101 Hull Road and 6 Locke Heights, Strathroy

#### Purpose and Effect

The Municipality is in receipt of Applications for Official Plan Amendment and Zoning By-law Amendment at 100 Hull Road and 6 Locke Heights, Strathroy (see location map). The lands are approximately 1.2792 ha (3.16 ac) in size and are designated 'Residential' in the Official Plan. The purpose and effect of the Official Plan Amendment Application is to amend /remove the "hazard" layer on the subject lands. The Zoning By-law Amendment application proposes to rezone the property from the 'Low Density Residential (R1) Zone' to a site-specific 'High Density Residential (R3-#) Zone', which permits townhouse dwellings. The applicant is proposing to build 26 dwelling units in 5 blocks. This will require amendments to the zoning standards to permit the townhouse dwellings including: Minimum rear yard setback 2.29 m whereas 9 m is required; and redefining common outdoor amenity area to include individual rear yard space.

#### PUBLIC MEETING

**Date:** May 21, 2024

**Time:** 6:00 pm

**Location:** Hybrid Public Hearing (ZOOM and in person-52 Frank Street, Strathroy, 2<sup>nd</sup> floor Council Chambers)

#### How to Participate in the Public Meeting:

- 1) Submit written comments to the Clerk at [clerk@strathroy-caradoc.ca](mailto:clerk@strathroy-caradoc.ca) or by mail to: 52 Frank Street Strathroy, Ontario N7G 2R4. Please note communications are part of the public record that will be provided to council and made available to the general public, pursuant to the Planning Act and the Municipal Freedom of Information and Protection and Privacy Act.
- 2) Speak to council by attending the meeting in person OR through ZOOM video or phone. Pre-registration is required by emailing [planning@strathroy-caradoc.ca](mailto:planning@strathroy-caradoc.ca) or by calling 519-245-1070 ext. 210. Leave your name, phone number, method you wish to participate in the meeting, as well as the application file number or address of the property you are calling about. Staff will return your call and provide participation details.
- 3) View the meeting online at [www.strathroy-caradoc.ca/meetings](http://www.strathroy-caradoc.ca/meetings). The livestream will begin at 6pm. No pre-registration is required.

If you wish to be notified of the decision of the Municipality of Strathroy-Caradoc on the proposed zoning by-law amendment, you must make a written request to the Clerk at [clerk@strathroy-caradoc.ca](mailto:clerk@strathroy-caradoc.ca) / 52 Frank Street, Strathroy, ON N7G 2R4. Should you require additional information relating to the proposed rezoning please contact Tim Williams, Manager of Planning by phone at: 519-930-1007 or by email at: [twilliams@middlesex.ca](mailto:twilliams@middlesex.ca).

#### Notices of Complete:

Per Section 34 of the Planning Act, information and material required under the Act have been provided and the zoning by-law amendment application was considered complete on April 2nd, 2024.

Per Section 22 of the Planning Act, information and material required under the Act have been provided and the official plan amendment application was considered complete on April 2nd, 2024.

[www.strathroy-caradoc.ca](http://www.strathroy-caradoc.ca)



## NOTICE OF APPLICATIONS AND PUBLIC MEETING

The applicant, or any authorized person, appointed in writing and acting on behalf of the applicant, must attend this Meeting. If you are aware of any persons affected by this application who have not received a copy of this notice, it would be appreciated if you would so advise them.

**\*PLEASE NOTE: POTENTIAL CHANGES TO THE PLANNING ACT MAY CHANGE APPEAL RIGHTS.**

If a person or public body would otherwise have an ability to appeal the decision of the Municipality of Strathroy-Caradoc to the Ontario Land Tribunal but the person or public body does not make oral submissions at a public meeting or make written submissions to the Municipality of Strathroy-Caradoc before the by-law is passed, the person or public body is not entitled to appeal the decision.

If a person or public body does not make oral submissions at a public meeting, or make written submissions to the Municipality of Strathroy-Caradoc before the by-law is passed, the person or public body may not be added as a party to the hearing of an appeal before the Ontario Land Tribunal unless, in the opinion of the Tribunal, there are reasonable grounds to do so.

Pursuant to Section 1.0.1 of the Planning Act and in accordance with Section 32(e) of the Municipal Freedom of Information and Protection of Privacy Act, it is a policy of the Municipality of Strathroy-Caradoc to make all planning applications and supporting material, including signed written submissions regarding the application and received by the Clerk, available to the public.

DATED: April 17, 2024

