

August 19, 2025

SBM-24-2255

Tim Williams  
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**Re: OPA 2-2024 (OPA20) & ZBA 4-2024 - Response to Revised Submission Comments – Proposed Townhouse Residential Development – 101 Hull Road & 6 Locke Heights, Strathroy**

This response letter has been prepared by Strik, Baldinelli, Moniz Ltd. (SBM) to address the revised submission comments of OPA 2-2024 (OPA20) & ZBA 4-2024 for a proposed townhouse residential development located at 101 Hull Road & 6 Locke Heights, Strathroy, dated July 8, 2025 after subsequent coordination with the Owner and the Municipality.

#### **Natural Heritage**

The original submission included bollards to demarcate the natural heritage area. It seems from the submission that in addition to bollards, rocks are proposed to demarcate the boundary. We need additional information about this size and how far apart the rocks would be located. If the distance needs to be spaced to prevent encroachment the municipality would be satisfied.

**Response:** *The applicant is committed to provide large rocks with a separation distance of approximately 2 feet apart. The intent of the barrier is to clearly identify an area that is to be protected. Additionally, a part of any work agreements for landscaping and maintenance, a provision will be included in all contracts that states “no landscaping work or dumping is permitted on the wooded side of the rock delineation”.*

#### **Engineering**

##### Storm Servicing

- The underground storage is located on a slope, there are concerns this location won't be sufficient. To be dealt with a site plan stage.
- Can STMH7 to STMH5 be located outside the right of way given this is a single access site (see ambulance comments below).

**Response:** *Comments are acknowledged, agreed to clear these comments through the Site Plan approval stage.*

##### Water Service

- The following are to be addressed during site plan approval, not rezoning,
- Servicing Standard requires Meter pit and valve will need to be installed at property line
- Proposed water service is 200, currently only 150 fronting the property
- Already have a water service from Locke Height on easement
- 6 Locke has a water service as well
- Unused sanitary and water services have to removed at the main
- A watermain that services a couple adjacent properties will be affected by the

- work and needs to be modified (see below)

**Response:** *Comments are acknowledged, agreed to clear these comments through the Site Plan approval stage.*

#### Sanitary

- It's mentioned that the preferred approach by the Municipality is servicing via gravity, this is only slightly true. We are open to pumping here as long as the pumping and forcemains are all private infrastructure, I believe this was discussed in the past.
- The road in front of building A should be clear of sanitary servicing given this is a single access site.

**Response:** *Comments are acknowledged, agreed to clear these comments through the Site Plan approval stage.*

#### Roads

- The Road Management Study in 2024 identifies Hull Road between Locke Heights and Caradoc Street N for 2031. Keep in mind, this study is based on the current road surface condition. It does not get into road widening, which is required to reconstruct Hull Road to our municipal standard.
- Based on our assessment, sight lines do not appear to be an issue with the proposed location. Please clarify how this does not meet the requirements of the TAC manual.
- The retaining wall is located on the property line, please ensure there is sufficient separation for maintenance.
- Provide clarity on how the future grades were determined along Hull Road. Some of them are increasing the grade by a significant amount and we still end up with a 7.6% slope which makes putting in a sidewalk potentially difficult.

**Response:** *Comments are acknowledged, agreed to clear these comments through the Site Plan approval stage.*

#### Fire Services

The Fire Department has reviewed the proposed design and acknowledge that the inclusion of a private hydrant which is in an acceptable location. Based on a review of the proposed layout, and in light of the fact that only a single entrance is available, the Fire Department has significant concerns regarding the safe and effective maneuverability of our emergency response vehicles within the constrained area. This limitation has the potential to impede our ability to provide timely and safe emergency services, which is a critical and essential operational requirement.

**Response:** *A truck turning movement plan has been completed for the proposed development, using the ladder truck details as provided by Strathroy-Caradoc Fire Services, and is attached for review. The Truck Turning Movement plan shows that the proposed design of internal roads and turnaround (as designed per the OBC requirements) on site should be adequate to allow for the ladder truck to enter the site, travel to the furthest units on site (units 13 & 14), turn around, and leave the site driving forward. The firetruck should not need to enter or swing over any of the individual unit driveways, or the designated visitor parking spaces (as proposed) to achieve this maneuverability on site. There are however areas where the truck body may extend over the roll over curb.*

*Per the attached plan, the proposed site layout and internal road design is adequate and should allow for timely and safe emergency services to be provided.*

#### Land Ambulance

From an ambulance access perspective, I would ask that they move the proposed storm sewer (particularly STMHs from 5 to 7) out from under the main access road and push the line towards Building 'C'. There appears to be enough spacing to relocate that line from STMH5 to STMH6 to under the curb line with CBMHs instead of STMHs.

**Response:** *Comments are acknowledged, agreed to clear these comments through the Site Plan approval stage.*

## Planning

The submitted materials reference in the cover letter that the sightlines are an issue if an intersection connects to Hull Road. The comments provided herein discuss the need for this access or changes to the site plan layout. The County Official Plan requires two access points unless staff confirm that single access is acceptable. In review of the comments, we would request some additional information about how this policy is being addressed. While this can in part be addressed during site plan planning staff want to make it clear that this remains an issue to be addressed with emergency services.

**Response:** *The process that SBM followed when completing the sightline analysis used TAC requirements. This process was discussed with Municipal and County staff during a follow up meeting to discuss all the provided comments. The SBM determination continues to be that an access to Hull Road, with the existing Hull Road profile, would not meet the TAC recommended intersection sight distances. Alternatively, providing multiple townhouse units fronting onto Hull Road (as existing), each with individual unit driveway accesses would not be a safe alternative. The resulting development placing multiple driveways along Hull Road would require residents to either back into or out of their driveway which is an additional risk. Additionally, many of these driveways would be located towards the eastern property line where sightlines would be even more challenging than the location studied for the potential site access. These driveways would be located along the steepest slope of Hull Road where sightlines and stopping distances would be the most crucial and would be the least provided.*

*Middlesex County Official Plan policy (2.4.2.2 I) which requires two accesses for all new residential developments is better intended for plans of subdivisions that create new municipal right of ways (roads and boulevard space) as opposed to infill development, which this proposed development would be defined as. Exceptions to this County policy (as outlined in the policy itself) can be considered if the proposed street pattern is approved by the local Municipality, emergency service provider(s), and the County Engineer. As identified above by the truck turning movement plan maneuvering analysis, emergency services should be able to access the site, reach the furthest units (traveling forward), and can then complete a full turn around allowing for the truck to drive forward out of the site. The proposed design also provides another turn around location sooner on the site, allowing for flexibility should the truck not be required to travel to the furthest units. This proposed design has been used in an effort to minimize the amount of reversing that would be required by emergency vehicles.*

## Natural Hazards

The St. Clair Region Conservation Authority provided formal comments dated May 1, 2024, regarding the Official Plan and Zoning By-law Amendment Applications. Please refer to those comments (attached for reference). SCRCA staff acknowledged that updated drawings prepared by SBM dated May 23, 2025, reflect the erosion hazard limit as determined in the Geotechnical Report prepared by LDS Consultants Inc. dated February 12, 2024. SCRCA staff make note that the Provincial Policy Statement (2020) referenced in the letter has been replaced by the Provincial Planning Statement (2024), and relevant policies in the new PPS include 5.1 and 5.2, however the recommendations of the letter remain the same. All units appear to be outside the erosion hazard limit (6 metres from top of bank). SCRCA has no concerns with the proposed new ingress/egress off Hull Road. (May 2024, SCRCA comments are below)

**Response:** *Comment is acknowledged. We consider all the Conservation Authority comments, dated May 1, 2024, to be addressed per our previous revised submission documentation.*

We trust this response letter meets your satisfaction. Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Respectfully submitted,

**Strik, Baldinelli, Moniz Ltd.**

Planning • Civil • Structural • Mechanical • Electrical



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