



# PLANNING JUSTIFICATION REPORT

## 6 LOCKE HEIGHTS, STRATHROY

LDS PROJECT NO. LD-00209

January 2024

Submitted to:

**MUNICIPALITY OF STRATHROY-CARADOC  
DEPARTMENT OF PLANNING**

DISTRIBUTION (VIA EMAIL):

Gold Leaf Properties Inc.

## **EXECUTIVE SUMMARY**

The following report provides a land use planning justification in support of a Zoning By-law and Official Plan amendment applications for MN 6 Locke Heights, Strathroy, in the Municipality of Strathroy-Caradoc.

A review of all relevant planning documents has been undertaken and has identified the opportunity for an Official Plan and Zoning By-law amendment to permit a 26-unit townhouse development at the subject location.

This report includes the review of the Provincial Policy Statement (2020); the County of Middlesex Official Plan; the Municipality of Strathroy-Caradoc Official Plan; and the Municipality of Strathroy-Caradoc Zoning By-law and the St. Clair Region Conservation Authority as they apply to the subject site.

Relative to the latter, the engineering background reports namely the Geotechnical, Storm Water Management and the Floodline and Backwater Analysis reports have identified an error in the Regulatory Flood elevation. The St Clair Reginal Conservation Authority (SCRCA) have reviewed the above report and had agreed with its conclusions. This is the basis of the Official Plan amendment to remove the Hazard land designation. Relative to the sloped rear lands, Natural Resource Solutions Inc. (NRSI), have reviewed and have determined both the dripline and setbacks related to the tree cover.

Sanitary sewer, Storm water sewer and water supply will be accessed to Hull Road and trunk mains located there.

Traffic onto Locke Heights has been studied by Strik, Baldinelli and Moniz (SBM). 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.

From a growth perspective, Strathroy like all other Cities, Towns or Villages in this region and beyond have undergone unprecedented growth in the past 5 years. The announcements of Volkswagen and Amazon relative to their plans in Talbotville will have a regional impact. The Province is addressing a housing crisis through various legislative and policy directions to provide municipalities with more tools to increase housing supply as quickly and reasonably as possible. Identifying and creating efficient use of currently underutilized parcels of land for intensification is precisely what the legislation and the province as well as the County and Strathroy Carqadoc are attempting to achieve.

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- Servicing Brief (LDS)
- Traffic Study (SBM)
- Environmental Development Assessment (NRSI)
- Flood Hazard Assessment (LDS)
- Geotechnical Assessment (LDS)

## 1.0 PURPOSE

The purpose of this report is to provide a land use planning analysis and justification for an Official Plan and Zoning By-law amendment application pertaining to the property identified as MN 6 Locke Heights in the Municipality of Strathroy-Caradoc. The Official Plan amendment sought is to redesignate the hazard land portion of the site to a Residential category since the St. Clair Region Conservation Authority (SCRCA) have reviewed and agreed with relevant studies that the site is no longer a flood hazard. The Zoning Bylaw amendment is to permit the 26 single story townhouse units.

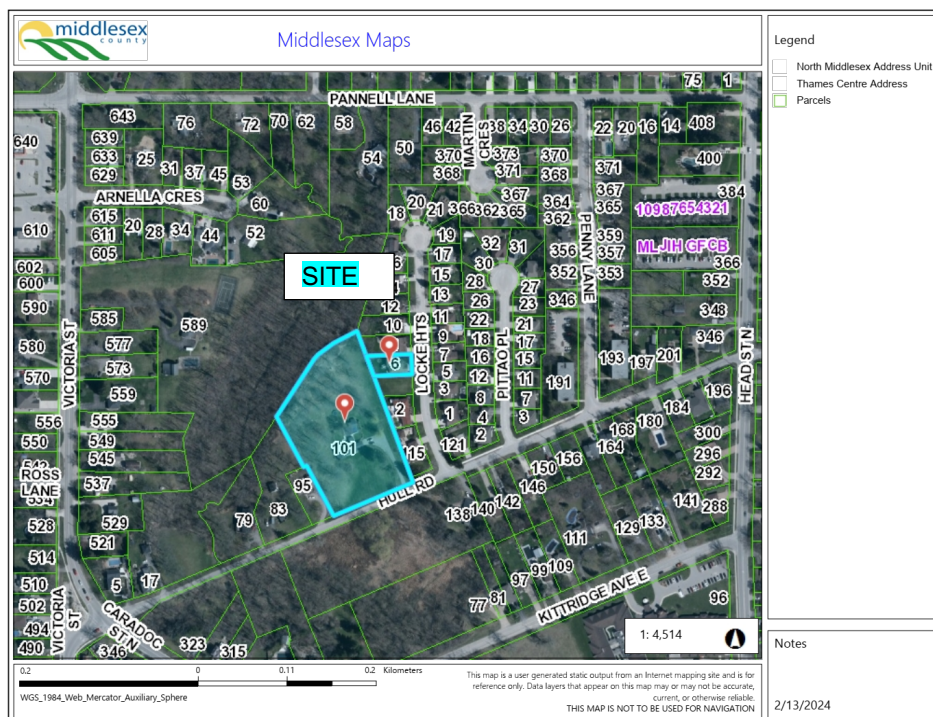
The applicant and property owner(s) are Gold Leaf Properties Inc. Consulting services are provided by LDS Consultants Inc. of London Ontario in association with Knutson Development Consultants Inc. (KDCI). Ric Knutson is the primary contact for the property owner / applicant and can be contacted at (519) 619-8732. KDCI is a land use planning and development management consultancy. Ric has 50 years of experience as a land use planner.

## 2.0 SUBJECT PROPERTY DESCRIPTION

The subject site is located on the north side of Hull Road in Strathroy. It is approximately 1.08 ha. with frontage on Hull Road of 83.63 m. The Assessment roll number is 391600014011800 and 391600014011744. The property has a bank adjacent to Storkman Drain. The table lands from the bank to Hull Road contain a house as well as at house 6 Locke Heights. Locke Heights will be the access for the 26 townhouse units. The lower portion of the property adjacent to Storkman Drain has been included as being regulated by the SCRCA. That has been studied and found not to be flood susceptible.

Adjacent land use is residential typically with single detached homes along Hull Road from days prior to flood regulations coming into effect. The newer single detached homes on Locke Heights are also single detached homes.

Figure 1 – Site Location



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### **3.0 BENEFITS OF PROPOSED DEVELOPMENT**

The proposed 216-unit townhouse development will utilize existing municipal services more efficiently as well as to provide a needed form of housing in the municipality adding to housing diversity. The proposed development is for single storey townhomes that are designed and geared to senior citizens as rental accommodations. The location adjacent to the Natural Heritage features further enhances its locational benefits for the intended target population.

### **4.0 MUNICIPAL SERVICES**

The development will be serviced by full municipal services.

### **5.0 APPLICATION CONSULTATION**

Communications with planning staff indicate the need for a number of studies including a Planning Justification Report. In addition, staff requested that a site plan be submitted demonstrating how the subject property may function with respect to the required parking, setbacks, fencing / landscaping and building coverage. The following sections of this report will address the concerns expressed by planning staff as the result of these communications. The significant issue at the pre-consultation review was the hazard land designation. This has been reviewed by the SCRCA and the conclusions of a “Flood Line and Backwater Analysis” have been agreed to by the SCRCA. The bank associated with Storkman Drain will remain as Open Space as reviewed by NRSI.

### **6.0 REQUESTED AMENDMENTS**

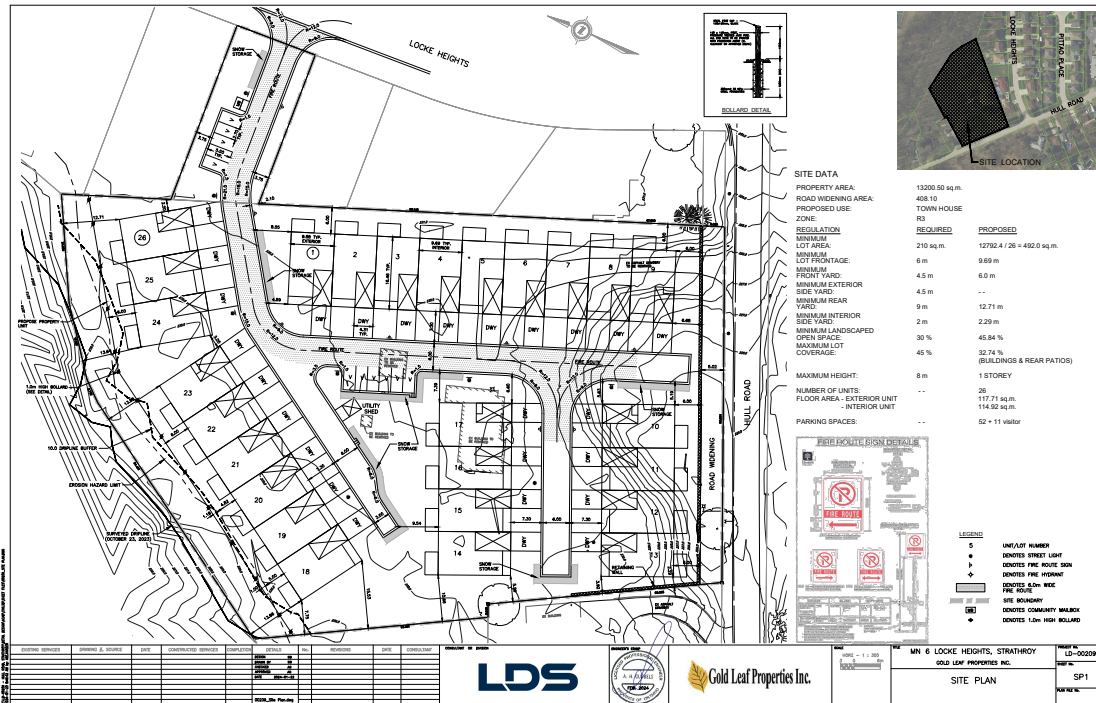
An Official Plan amendment is required to recognize the recent determination that the subject property is not in the floodplain. The justification for this is the Floodline and Backwater Analysis (attached) as reviewed by the SCRCA and agreed that the property should not have been included in the floodplain mapping and are recommending that this be rectified. The entire site will become Residential with the Official plan amendment.

A Zoning By-law amendment is being sought in order to facilitate the development of 26 townhouse dwellings on the subject property. More specifically, an amendment to the Zoning By-law (No. 43-08) to R3 is being sought along with the Official Plan amendment to remove the hazard and Natural heritage zoning overlays.

### **7.0 PROPOSED USE AND PROPOSED SITE PLAN**

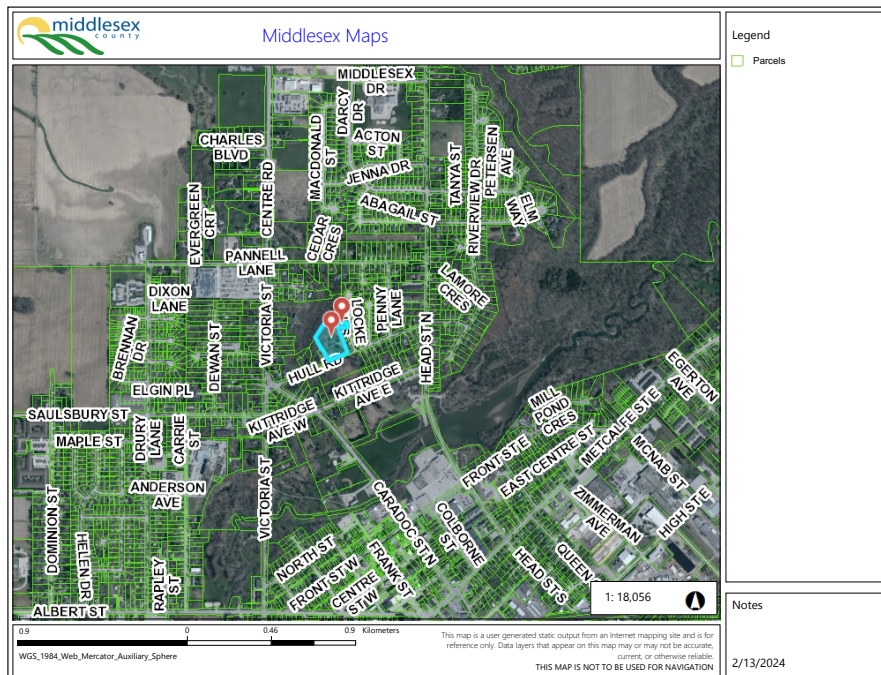
Figure 2 is a proposed site plan that depicts the development of 26 townhouse units on the subject property. Access to the property is proposed to be from Locke Heights through the lot at 6 Locke Heights.

Figure 2 – Proposed Site Plan

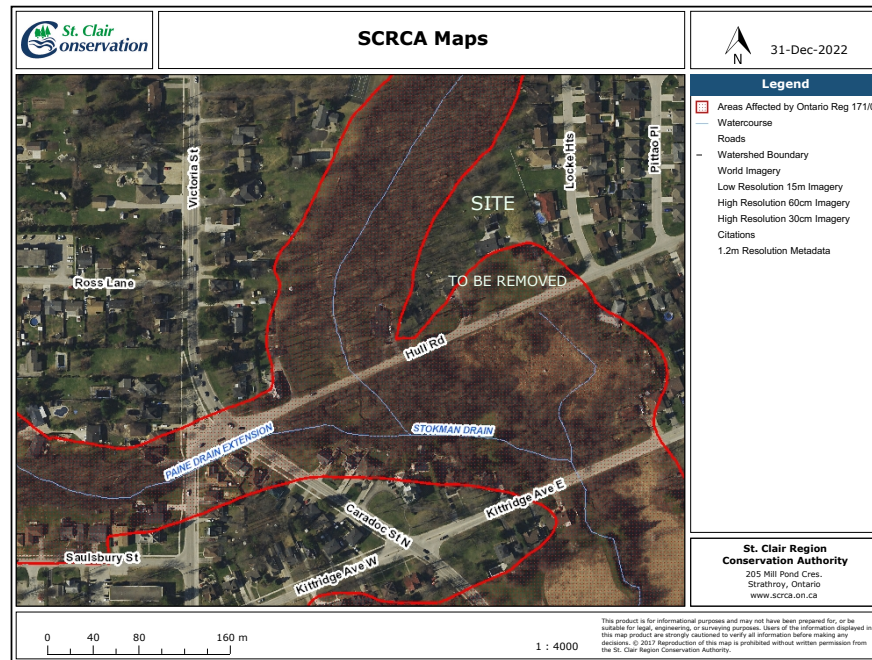


8.0 PROPERTY CONTEXT AND SURROUNDING LAND USE

Figure 3 Site and Surrounding Area



**Figure 4 CURRENT SCRCA REGULATION LIMITS**



## 9.0 POLICY DOCUMENTS AND ZONING

### 9.1 PROVINCIAL POLICY STATEMENTS, 2020:

***The Provincial Policy Statements are required to be consistent with under Section 3 of the Planning Act. The following statements support the proposed 47-unit single story townhouse development. It should be noted that the Province has just released new proposed policies that have not yet been adopted.***

*Section 1.0 – Building Strong Healthy Communities establishes policies that support long- term prosperity, environmental health and social well-being within communities.*

*Section 1.1.1 a) through h) of the PPS identifies that healthy communities are sustained by accommodating an appropriate range and mix of uses, avoiding development patterns that cause environmental concerns, and promoting cost-effective development patterns that optimize the use of planned and future infrastructure.*

***Current provincial policy regarding urban development favours “Settlement Areas” as the primary location for development in order to fully utilize existing municipal services (i.e., sewers, public transit, parks, etc.) and to use land more efficiently to curb the impacts of***

***urban sprawl.***

***Accordingly, the proposed 21-unit one-floor townhouse development will utilize an existing vacant property that has frontage on a public street and will have access to municipal services.***

***Section 1.1.3.1 of the Provincial Policy Statement (2020) regarding “Settlement Areas” indicates that settlement areas “shall be the focus of growth and development” This policy requires municipalities to utilize existing lands more efficiently to discourage the premature expansion of “Settlement Area” boundaries into agricultural areas.***

***Further, Section 1.1.3.2 a), b), c) and d) require that land use patterns within settlement areas be based on “densities and a mix of land uses which efficiently use land and resources”; and “a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3.”***

***The proposed satisfies the intent of this policy.***

*Section 1.4 – Housing speaks to the provision of housing within a municipality. The PPS promotes an appropriate range and mix of housing types and densities and directs development of new housing towards areas where there is an appropriate level of infrastructure. Municipalities are to provide opportunities for all forms of housing and intensification to meet the social, health and well-being needs of the current and future community.*

***The requirement for intensification is clearly stated as a Provincial requirement. The proposal satisfies this policy.***

*Sections 1.6 – Infrastructure and Public Service Facilities directs that infrastructure and be provided in an efficient manner that also prepares for the impacts of a changing climate. Section 1.6.2 directs municipalities to promote green infrastructure to complement existing infrastructure.*

***The proposed project is on full municipal sanitary sewer and water. The Storm water management is accommodated onsite through onsite orifice restrictions to ensure that post development flows are less than predevelopment storage thus not requiring additional infrastructure.***

*Section 1.6.6 – Sewage, Water and Stormwater directs future growth and development to efficiently use and optimize existing services such as municipal sewage and water services, when available, and promote water conservation and water use efficiency. Servicing and land use considerations shall be integrated at all stages of the planning process. Further, municipal sewage and water services are the preferred form of servicing for settlement areas.*

**Existing services will be utilized for the proposal with sewer and water to and from Hull Road. The municipal (Storkman) drain is proposed as the outlet for this development.**

*Section 1.6.6.7 promotes planning for stormwater management that is integrated with planning for sewage and water services and ensures that systems are optimized, feasible and financially viable over the long term; minimizes or prevents an increase in negative impacts on the environment and water system; does not increase risks to human health and safety and property damage; maximizes the extend and function of vegetative and pervious surfaces; and promotes stormwater management best practices such as low impact development, water conservation and stormwater attenuation*

## **9.2 MIDDLESEX COUNTY OFFICIAL PLAN**

**The County Official Plan has recently been updated through Amendment #3. That amendment has been approved by the Ministry. As a general statement, the County of Middlesex Official Plan is highly supportive of the proposed 216-unit townhouse development.**

**The essential framework of the County Plan is to provide a high-level policy basis for all component municipalities based on the following themes: Agriculture, Natural Systems, Growth Management, Energy Efficiency and Climate Change. Detailed Land Use policies are delegated to the local municipalities.**

**The County Plan has and continues to support Intensification and diversification of the housing base in area municipalities including Strathroy-Caradoc.**

**Schedule A to the County Official Plan identifies Strathroy as an Urban Area based on the availability of full municipal services.**

**The specific policies that apply are as follows:**

**GENERAL POLICIES:**

*2.3.5 General Policies*

**These policies generally support complete communities offering lifestyle choice, planning for growth focused on Settlement Areas and the protection of Agriculture and Natural Heritage features. Relative to this proposal, it is within the Settlement Area boundaries of Strathroy and there are no Agricultural or Natural heritage issues present.**

*2.3.7 Housing Policies*

- a) intensification is supported in Settlement Areas**
- b) the provision of housing for Special Needs Groups. This project is based on provision of rental seniors housing.**
- e) housing accessible to moderate- and low-income households requiring that 20% of all housing be affordable. Affordable is a defined term in the Official plan and is proposed to be removed in Amendment # 3.**

*2.3.7.2 Number, Range and Mix of Housing Units*

**Amendment # 3 contains a forecast of housing needs. Strathroy Caradoc is forecast as needing 600 new households by 2046 (Schedule ‘B’).**

**The existing policy which continues encourages a mix of housing types, densities, options, innovation. These policies are supportive of the proposed 26-unit seniors townhouse development.**

*2.3.7.3 Intensification and Redevelopment*

**These policies provide general guidance for several circumstances that include the following based on the following criteria:**

**The current land and / or the surrounding land uses do not pose an adverse impact on human health.**

**The existing or planned physical services can support new households in the area, and**

**Physical compatibility with the existing built form,**

**The proposed single storey townhomes are compatible with existing development based on their height and location behind adjacent single**

**detached homes. Traffic has been studied and found to have no operational issues with local traffic.**

#### *2.3.7.45 Implementation*

**The County supports increased densities, adequate land supply and residential intensification.**

#### *2.3.8 Urban Areas*

**Generally, the County directs the highest intensity of growth to Urban Areas including Strathroy based on full municipal services, that development proceed in a logical manner and compact form. The proposed is an infill proposal within an existing built up area of Strathroy**

#### *2.4.2 TRANSPORTATION SYSTEM*

**These policies both existing and amended provide the relationship between various road classifications. The location on the north side of Hull Road and west side of Locke Heights is walking distance to downtown**

##### *2.4.2.1 Transportation Hierarchy*

**New policies have been enacted for private road proposals including:**

**\*Site characteristics including size, configuration and topography**

- feasibility of alternative access solutions**
- potential impact on traffic**
- potential impact on the road network**
- servicing by local emergency services; and**
- compatibility with surrounding uses**

**A Traffic Impact Assessment has been completed as the conclusion is that there is no impact on the functioning of local streets**

**The development is based on a single access with internal roads all having a minimum of 12m centreline radius for emergency vehicles and garbage.**

**The private road will appear like a driveway but with enhanced features such as curb and gutter. This is compatible with surrounding development as**

**evidenced by the low number of anticipated trips both morning and evening noting this is a senior's development that mostly have no work-related travel.**

#### *2.4.2.2 General Policies*

**A new policy (I) has been enacted requiring all residential development proposals to have a minimum of 2 entrances. A single access would be permitted subject to the approval of the local municipality.**

### **3.0 DETAILED LAND USE POLICIES**

#### *3.2.4 Permitted Uses*

- a) *A variety of housing types.*  
**This policy supports the single storey housing proposed.**

### **4.0 IMPLEMENTATION**

#### *4.5.2 Site Plan Control*

Site Plan control is encouraged. The proposed development will be proceeding based on site plan control.

**FIGURE 5**

**Middlesex County Official Plan excerpt**



### 9.3 Municipality of Strathroy Caradoc Official Plan (Update: February 2023)

The subject site is currently designated “Residential and Hazard Land” in the Municipality of Strathroy-Caradoc Official Plan. As such an amendment will be required to Residential for the Hull Road associated hazard lands as they have agreed to be taken out of the regulation limits by the SRCA. In support of that amendment, we have reviewed the Residential policies as they would apply to this site. The Residential designation would permit the proposed development once amended.

#### Residential Policies:

##### 3.3.4.5 Medium Density Development

The proposed will enter and exit from a local street (Locke Heights). Locke Heights connects to Hull Road which in turn connects to arterial Head St. on the east and arterial Caradoc St. on the west. The low single storey profile of the proposed, will be complimentary to the existing low density uses along Locke Heights and Hull Road

##### 3.3.4.7 Residential Intensification

The proposed is consistent with the Official Plan policy regarding intensification and the County Official Plan and the PPS (2020).

##### 3.3.4.9 Lifestyle Communities

Strathroy has had years of experience with the Twin Elms land lease community as well as other similar developments to the proposed. While it is proposed to be zoned Residential third density, it is designed for senior citizen rental accommodation

## 7.2 INTERPRETATION

### 7.2.1 UNEXPECTED SITUATIONS

*Where a situation arises not specifically addressed by the policies of this Plan, the general intent and spirit of the Plan shall be determining factors establishing conformity with the Plan.*

## 7.3 AMENDMENTS AND REVIEW

### 7.3.1 WHEN CONSIDERED

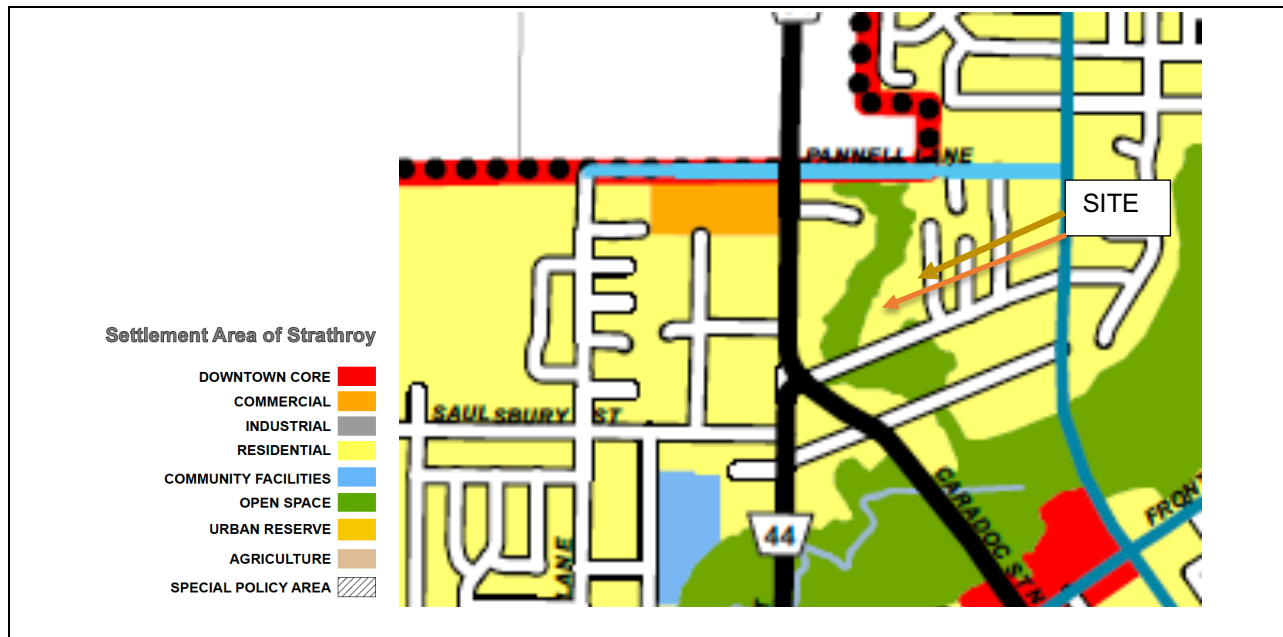
*Amendments to the Plan shall be considered in response to changing circumstances within or affecting the Municipality; changes in policy, legislation and guidelines of other levels of government which may have a bearing on existing uses or the future development of the Municipality and in response to specific applications by landowners and developers. In addition, the conversion of lands within Employment Areas to non-employment uses may be permitted through comprehensive review.*

**The proposed development will eliminate a portion of hazard land that has been studied and determined not to be flood susceptible.**

7.3.2 WHEN NOT REQUIRED

*Amendments to the Plan will not be required in order to make minor adjustments to the boundaries of land use designations and the location of roads provided the general intent and spirit of the Plan is maintained. Such adjustments need not be reflected on the schedules.*

**FIGURE 6  
 Official Plan excerpt**



**9.5 Municipality of Strathroy-Caradoc – Zoning By-law No. 43-08  
 Consolidated February 2023.**

The Strathroy-Caradoc-Zoning By-law currently zones the subject R1 and OS with a Natural Environment overlay. Once the floodplain change is confirmed by the SCRCA that overlay and the Open Space Zone can be changed to Residential R3. The OS and Natural Heritage overlay would remain as they affect the bank of the Storkman Drain at the rear of the property.

Section 7 of Zoning By-law No. 43-085 contains the High Density Residential 3 (R3) Zone which permits multiple-unit dwellings including townhouse dwellings. The proposed site plan conforms to all R3

The various permitted uses are subject to different zone provisions subject to Section 7.3 of the Zoning By-law. The following table outlines the required and proposed zone provisions for the proposed townhouse development in the Zoning By-law:

**Figure 7**

**DATA Sheet**

<b>SITE DATA</b>		
PROPERTY AREA:	13200.50 sq.m.	
ROAD WIDENING AREA:	408.10	
PROPOSED USE:	TOWN HOUSE	
ZONE:	R3	
<u>REGULATION</u>	<u>REQUIRED</u>	<u>PROPOSED</u>
MINIMUM LOT AREA:	210 sq.m.	12792.4 / 26 = 492.0 sq.m.
MINIMUM LOT FRONTAGE:	6 m	9.69 m
MINIMUM FRONT YARD:	4.5 m	6.0 m
MINIMUM EXTERIOR SIDE YARD:	4.5 m	--
MINIMUM REAR YARD:	9 m	12.71 m
MINIMUM INTERIOR SIDE YARD:	2 m	2.29 m
MINIMUM LANDSCAPED OPEN SPACE:	30 %	45.84 %
MAXIMUM LOT COVERAGE:	45 %	32.74 % (BUILDINGS & REAR PATIOS)
MAXIMUM HEIGHT:	8 m	1 STOREY
NUMBER OF UNITS:	--	26
FLOOR AREA - EXTERIOR UNIT		117.71 sq.m.
- INTERIOR UNIT		114.92 sq.m.
PARKING SPACES:	--	52 + 11 visitor

**Requested Site Specific Zone:**

The following is the requested Residential (R3) Zone

**R3 – 6 Locke Heights - Strathroy**

a) Defined Area: R3 as shown on Schedule 'B, Map No. 8 to this By-law.

b) Permitted Uses: townhouse dwellings (26 units)



consumers. The proposed development will assist in fulfilling the intensification policies of the Provincial Policy Statements 2020), The County of Middlesex policies for intensification and similar requirements of the Village of Mount Brydges in the Strathroy-Caradoc Official Plan.

It is our considered opinion that the proposed development of a 26-unit townhouse project at MN 6 Locke Heights can be amended to be in conformity with the planning Policy documents and subject to a rezoning will provide additional housing stock for the Town. An Official plan amendment is required to remove the hazard overlay from a portion of the area adjacent to Hull Road.

## 12.0 REFERENCES

1. Provincial Policy Statement (2020)
2. County of Middlesex Official Plan (Consolidation: 2006)
3. Municipality of Strathroy-Caradoc Official Plan (Consolidation: April 2018)
4. Municipality of Strathroy-Caradoc Zoning By-law (No. 43-08)
5. Housing Market Outlook for the London CMA – Fall 2019
6. Development Charges background Report – Hemson 2015

## 13.0 CLOSING

We trust this satisfies your present requirements. If you have any questions or require anything further, please feel free to contact the undersigned. No portion of this report may be used as a separate entity. It is intended to be read in its entirety.

Respectfully Submitted,



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