

Building Industry and Land Development Association (BILD)

Questions and Comments - DC Study

(Note - The original question or comment submitted is presented below in **bold font**, while the Town's response is provided in standard (non-bolded) font.)

General Questions

1. **There are several questions regarding student household forecasts:**
 - a. **What is the basis for the off-campus student population forecast of 3,334 students by 2051? Is this attributable to the Milton Education Village or other post-secondary institutions (Conestoga) or both?**

The off-campus student population forecast of 3,334 students by 2051 is derived from the *Town of Milton Phase 1 - Residential and Non-Residential Needs Analysis Final Report* (October 2024, amended February 2025), hereafter referred to as the Phase 1 Report. The Phase 1 Report incorporated student enrolment projections provided by both Conestoga College and Wilfrid Laurier University, reflecting their anticipated presence within the Milton Education Village. Representatives from these institutions also supplied estimates of the share of students expected to live off-campus, which were used to calculate the off-campus student population not captured in Census data. Accordingly, the forecast of 3,334 off-campus students by 2051 reflects the combined influence of both Conestoga College and Wilfrid Laurier University within the Milton Education Village.

- b. **Section C.12.3 of the Milton Official Plan forecasts 3,000 students and 460 faculty/staff jobs by 2031 at the MEV and 15,000 students and 2,300 jobs to build-out. Given the similarities between the 2031 OP estimated student count (3,000) and the DC Study's 2051 student count (3,334 off-campus students), has the Town postponed the timing of the MEV from what is contained in the OP?**

As noted in response 1a), representatives from Conestoga College and Wilfrid Laurier University provided updated student enrolment projections for their respective institutions, which have been revised downward in light of changes to federal immigration policy.

- c. **How have on-campus students been factored into the DC study calculations?**

On-campus students are included in the gross and net population increase as shown on Schedules 2 through 5 of Appendix A. The net population increase is utilized for the Level of Service calculations in Appendix B. The gross population increase is utilized in the DC calculations in Chapter 6.

- The Town's 2024 DC Reserve Fund Statement (DCRFS) states that the Town has \$206 million in "financial securities" - are these funds earmarked for capital works that would otherwise be DC eligible? Does the Town have information on the intended use of these funds as set out in subdivision agreements or site plan agreements?

The \$206 million in financial securities held by the Town are not related to capital works that would otherwise be DC eligible. These financial instruments are held as security to ensure the parties subject to the various agreements/permits/etc. complete their obligations as agreed to. In regards to subdivision and site plan agreements, these securities generally relate to the obligation of the developer to construct the local services as outlined in the Town's Local Service Policy and as confirmed through the agreement. Upon completion of the obligations by the other party, the Town will return the securities in full. The Town will only use these funds if there is a default under the agreement and the Town is required to complete the necessary works.

- The \$15.2 million in DC reserve fund deficit used in the DC study, however this is a net amount after accounting for committed spending. Can the Town provide a detailed list of committed project spending that was used to convert the \$40.1 million 'cash' balance reported in the 2024 DCRFS to the adjusted balance?

The following table provides a detailed list of the committed project spending as at December 31, 2024 that is reflected in the DC reserve fund balances:

	Committed Project Spending at December 31, 2024
Services Related to a Highway	
C330108 BRONTE STREET (MAIN ST TO STEELES AVE)	(1,074,126)
C330146 NIPISSING ROAD RECONSTRUCTION	(1,391,975)
C339000 ASPHALT OVERLAY PROGRAM - CONSTRUCTION	(101,966)
C339001 ASPHALT OVERLAY PROGRAM - DESIGN	(24,170)
C340020 THOMPSON ROAD (LOUIS ST LAURENT TO DERRY RD)	(444,949)
C340021 THOMPSON ROAD (BRITANNIA RD TO LOUIS ST LAURENT)	(81,388)
C340046 5TH LINE (HWY 401 TO DERRY ROAD)	(169,902)
C340046 FIFTH LINE (HWY 401 TO DERRY ROAD)	(1,480,704)
C340047 FIFTH LINE (DERRY ROAD TO BRITANNIA ROAD)	(18,599,815)
C340050 MAIN STREET (JAMES SNOW PKWY TO 5TH LINE)	(1,755,334)
C340054 MAIN STREET (FIFTH LINE TO SIXTH LINE)	(663,909)
C340066 SIXTH LINE (HWY 401 TO BRITANNIA RD)	(843,342)
C340091 PERU ROAD (BRIDGE REMOVAL AND CUL DE SAC)	(586,217)
C340092 BOULEVARD WORKS	(391,824)
C350005 APPLEBY LINE	(50,421)
C350138 5 SIDE ROAD AND ESQUESING LINE (NEW TRAFFIC SIGNAL)	(689,686)
C380108 BOYNE PEDESTRIAN RAILWAY CROSSING	(5,786,909)
C400113 NEW TRAFFIC SIGNALS	(408,678)
C400114 PREEMPTION TRAFFIC CONTROL SYSTEM	(80,287)
C540111 DERRY GREEN UNION GAS PIPELINE EASEMENT	(32,709)
Total Services Related to a Highway	(34,658,311)

**Committed Project
Spending
at December 31, 2024**

Fire Protection

C730118 FIREFIGHTING HOSE GROWTH	(13,603)
C730123 PERSONAL PROTECTIVE CLOTHING GROWTH	(10,103)
C730158 SPECIALIZED EQUIPMENT TRAINING STRUCTURE GROWTH	(35,700)
C740100 FIRE SERVICES MASTER PLAN	(77,104)
Total Fire Protection	(136,510)

Public Works Operations

C460101 1 TON DUMP TRUCKS - GROWTH	(215,706)
C460104 TRACTORS, LOADERS & BACK HOES - GROWTH	(21,488)
C460105 TRAILERS/WATER TANKS - GROWTH	(26,700)
C594105 CIVIC OPERATIONS CENTRE	(1,203,114)
Total Public Works Operations	(1,467,008)

Stormwater Derry Green

C440107 STORMWATER MANAGEMENT - DERRY GREEN (BP2)	(190,336)
Total Stormwater Derry Green	(190,336)

Stormwater Boyne

C440106 STORMWATER MANAGEMENT - BOYNE	(272,423)
Total Stormwater Boyne	(272,423)

Stormwater Sherwood

C440105 STORMWATER MANAGEMENT - SHERWOOD	(202,071)
Total Stormwater Sherwood	(202,071)

Stormwater Trafalgar

C440111 STORMWATER MANAGEMENT - TRAFALGAR	(128,855)
Total Stormwater Trafalgar	(128,855)

Stormwater MEV

C440109 STORMWATER MANAGEMENT - MILTON EDUCATION VILLAGE	(258,899)
Total Stormwater MEV	(258,899)

Library

C800103 COLLECTION - NEW	(475,102)
C598000 LIBRARY - NEW BRANCH BUILDINGS	(1,471,504)
Total Library	(1,946,606)

Transit

C550104 TRANSIT BUS PADS	(30,941)
C570103 CONVENTIONAL TRANSIT - 12 METRE BUS - GROWTH	(417,725)
C570108 TRANSIT SUPPORT VEHICLES	(38,541)
C595001 TRANSIT OPERATIONS CENTRE	(20,385,773)
Total Transit	(20,872,980)

**Committed Project
Spending
at December 31, 2024**

Growth Studies

C100102 CORPORATE STRATEGIC PLAN	(173,438)
C100123 MILTON EDUCATION VILLAGE	(66,425)
C100128 STRATEGIC PLAN IMPLEMENTATION	(56,166)
C200100 DEVELOPMENT CHARGES STUDY	(370,190)
C200123 SPECIAL FINANCIAL STUDIES	(262,490)
C260002 IMPACT ON REGULATORY FRAMEWORK STUDY	(62,945)
C300109 TRANSPORTATION MASTER PLAN	(1,945)
C420109 DOWNTOWN PARKING STUDY	(6,303)
C500106 RECREATION MASTER PLAN (DC)	(240,119)
C510139 URBAN FORESTRY MANAGEMENT	(50,786)
C520101 JANNOCK PROPERTY MASTER PLAN	(240,648)
C550113 TRANSIT STUDY IMPLEMENTATION	(202,959)
C900110 OFFICIAL PLAN REVIEW	(50,690)
C900144 URBAN DESIGN GUIDELINES	(52,530)
C900150 UR SP PH4 - WATER & WASTEWATER SERVICING	(300)
C900151 UR SP PH4 - FSEMS (SWM & ENVIRO MGMT STRATEGY)	(112,903)
C900152 UR SP PH4 - TRANSPORTATION PLAN	(23,675)
C900154 UR SP PH4 - SECONDARY PLAN	(167,148)
C900156 UR SP PH4 - PARKS/RECREATION/TRAILS MASTER PLAN	(2,274)
C900157 UR SP PH4 - URBAN DESIGN GUIDELINES	(4,233)
C900170 MEV SECONDARY PLANNING / SITE SPECIFIC ZONING	(92,261)
Total Growth Studies	(2,240,428)

Parks and Recreation

C381000 BOYNE MULTIUSE (ASPHALT TRLS IN GREENLANDS) LIT - W. 16 MILE	(114,818)
C381001 BOYNE LIMESTONE TRAILS (WEST, TREMAINE RD TO 16 MILE CREEK)	(277,371)
C381002 BOYNE PEDESTRIAN BRIDGE - MINOR CROSSING	(180,420)
C381003 BOYNE LIMSTONE TRAILS IN GREENLANDS SYSTEM (E.16 M. TO JSP)	(888)
C381004 BOYNE MULTIUSE (ASPHALT TRAILS IN GREENLANDS SYSTEM LIT)	(454,157)
C520123 JANNOCK PARK DEVELOPMENT	(47,600)
C521139 COMMUNITY PARK - EXTERNAL TO BOYNE	(353,149)
C522133 DISTRICT PARK WEST - BOYNE	(615,834)
C524001 WALKER NEIGHBOURHOOD PARK - BOYNE	(337,835)
C524003 COBBAN NEIGHBOURHOOD PARK - BOYNE	(93,211)
C524004 BOWES NEIGHBOURHOOD PARK - BOYNE	(64,289)
C592208 SHERWOOD COMMUNITY CENTRE	(3,657,207)
Total Parks and Recreation	(6,196,779)

Total Development Charge Commitments	(68,571,205)
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4. Table 4-2 of the DC Study splits the various reserve fund balances (net of commitments) into residential and non-residential reserve amounts.
 - a. What are these splits based on?
 - b. Does the Town maintain separate reserve funds for residential versus non-residential?

The Town maintains separate development charge reserve funds for residential versus non-residential development. The residential and non-residential splits for the various reserve fund balances are reflective of the actual balances in each of the reserve funds.

Population, Household and Employment Forecasts

5. In the Pre-HUSP areas, as well as the Bristol, Sherwood, Boyne and Rural areas there is an incline in the Town’s existing dwelling units forecast for the 2025-2035 period, and a decline in those same existing dwelling units for the overall 2025-2051 period, suggesting a rapid decline in population in existing units over the 2036-2051 period. What is the basis for the significant flux in anticipated occupancy patterns in existing units from one period to the next, and does the Town or their consultants have an assumed cause of the changes from one period to the next?

Change in Population in Existing Dwelling Units, Town of Milton, 2025-2051

	Existing Units (2025)	Change in Population in Existing Units		
		2025-2035	2036-2051	2025-2051
Pre-HUSP		1,850	(3,340)	(1,490)
Bristol		4,317	(7,777)	(3,460)
Sherwood		2,846	(5,134)	(2,288)
Boyne		1,184	(2,135)	(951)
MEV		-	-	-
Britannia Secondary Plan		16	(29)	(13)
Agerton Secondary Plan		2	(3)	(1)
Trafalgar Secondary Plan		8	(14)	(6)
Community Area Expansion Lands		-	-	-
Rural		619	(1,116)	(497)
Total	46,280	10,842	(19,548)	(8,706)
Change in PPU		0.23	(0.42)	(0.19)

Source: Town of Milton 2025 DC Study, Page A-2 and A-3

The growth forecast applied in the 2025 Town of Milton Development Charge Background Study, as set out in Chapter 3 and Appendix A, is derived from the Town of Milton Phase 1 Report (October 2024, amended February 2025). The Phase 1 report comprehensively examined macroeconomic and demographic trends influencing growth in the Greater Toronto Hamilton Area and the Town of Milton, and assessed the Town’s growth outlook to 2051 as part of the Town’s

Official Plan Review. The Phase 1 report was approved by the Council on June 3, 2024.

Since 2001, the Town's P.P.U. has trended upward and is forecast to continue increasing to a peak in 2026. Strong population growth in the Town will be driven by net migration, particularly in the family-age households (i.e. 20 to 44 age group) and their children (0-19 age group), and is anticipated to place upward pressure on the total P.P.U. and occupancy in existing households in the first 10-year period, which is largely attributed to the Pre-HUSP, Bristol, Sherwood, Boyne, and Rural Area. The other areas are expected to develop in the latter half of the forecast. Over the longer term to 2051, the Town-wide P.P.U. is projected to decline to 3.010 by 2051. This results in a population decline in existing households of -8,700, which is largely due to a moderation in the pace of the population growth and aging of the existing population over the longer term.

- 6. Schedule 7B is used to establish PPU assumptions for apartment units, using Halton Region data from the 2021 Census. Has the Town's consultant obtained data similar to Schedule 7A that is for the Town only?**

Yes, we have reviewed apartment unit P.P.U. for the Town of Milton and the Halton Region. In preparing the Phase 1 Report, new unit persons-per-unit (P.P.U.) data were reviewed for both the Town of Milton and Halton Region. This detailed review of Milton's apartment P.P.U. indicated that the sample size for P.P.U. was not sufficient for households beyond 1-5 year of age dwelling category. Therefore, the Halton Region apartment P.P.U. data were applied to provide a more comprehensive and representative dataset for forecasting purposes. This approach is consistent with the 2021 Development Charge Background Study.

Studies

- 7. Are the Sustainable Halton studies (projects 14 and 15) being done on behalf of Halton Region or Conservation Halton?**

Sustainable Halton refers to the urban expansion area that encompass the following secondary planning areas:

- Trafalgar
- Agerton
- Britannia East/West
- Milton Education Village
- Milton Education Village Supplementary Lands

Both the land base analysis (project 14) and the subwatershed study (project 15) were undertaken by and for the Town as the preliminary planning studies for the

future development of the Sustainable Halton Lands. These studies have been completed and are available on the Town's website. The projects included in the DC Background Study are related to the reimbursement of the costs to undertake the studies that were originally accelerated through funding agreement(s) and now require reimbursement from the related growth.

Transit

- 8. What costs are included in the \$2.525 million cost for the MEV Terminal and the Britannia Terminal, and how do these terminals differ from the \$515,000 Kennedy Circle Terminal?**

The MEV Transit Hub and Britannia Terminal include off-street, dedicated bus laybys with passenger amenities. The Kennedy Circle Terminal is an on-street treatment with passenger amenities to accommodate bus layover and transfers. Costs for all projects include contract administration, planning/design and site works.

- 9. Why is there no land included in the Land - 10-Year Services DC calculation for transit services? Will the transit terminals be constructed on land the Town already owns?**

The MEV Transit Hub is expected to be constructed on lands already owned by the Town within the MEV Secondary Plan area. As noted above, the Kennedy Circle Terminal is an on-street terminal within the right-of-way and as such, no additional land is required. Land was not included in the DC calculation for the Britannia Terminal as it is anticipated the lands will be dedicated to the Town as the tertiary plan proceeds in this area.

- 10. According to the Town's Transit Master Plan, the Town's existing service levels (as measured in service hours per capita) is by far the lowest of comparable municipalities, or "less than half the number of service hours per capita compared to municipalities of similar population size, geography and travel patterns". This would suggest that this means that only 18% of net new trips from the Master Plan's increase in service hours per capita from 0.4 to 1.0 would be from increased usage from existing residents via induced/unmet demand. This appears to be an understated proportion of benefit based on the findings of the Master Plan: "the existing network is not convenient for many customers using transit for trips within Milton...there is a need to address coverage, frequency, and travel times to increase the attractiveness of transit" "Milton is the largest municipality in Canada, and the only municipality over 50,000 people, that operates fixed-route transit service that does not run on Sundays. Many residents have expressed a strong desire for transit service on Sundays to access social services, places of work, places of worship, and recreational opportunities." According to the Dillon report attached to the DC Study, the entirety of the increase in annual boardings from existing households**

resulting in the 18.5% allocation to BTE is due to the increase in housing unit occupancy (Table 24/28), with no increase assumed regarding how existing residents of existing households might increase transit usage from the doubling of service hours per capita (Table 6 of Dillon). The calculation of BTE for Access+ vehicles is based on estimating the number of existing residents that will age-into the need for the service, and are estimated to be 11.5% of the growth in registrants. This approach ignores that an increased service may result in existing registrants accessing the Town's services more often than they currently do because the service is more available and reliable. This calculation and others like it are based on the assumption that the existing service is adequate and that any increase in service would not stimulate demand or meet otherwise unmet demand due to relative lack of service. Regulation 82/98 requires that assessment of ridership forecasts proposed to be funded by the development charge are to assess whether the "forecasted ridership will be from existing or planned development" - in my opinion, the requirements of the regulation have not been met as unlike similar analyses in jurisdictions elsewhere in Ontario, there has been no estimate of what a doubling of the service levels to 1.00 service hour per capita would do to induce transit ridership from residents living in existing dwellings.

Conventional:

Table 24 considers the total boardings that would be expected if existing and growth residents continued to ride at the same rate (boardings per capita) as today, based on the housing type they live in. As noted on page 47, "the average trips per capita is required to grow (for both) the existing and growth population to achieve the 2035 target for boardings. This suggests that the service improvements will benefit both the existing population and the growth population." Therefore, the 18% increase in boardings (the boarding adjustment factor from table 25) is applied to both the existing and growth residents. While there is unmet demand that would increase the boardings per capita, it is expected that the growing population would have a similar level of unmet demand if service levels were to increase proportional only to growth; therefore, the increase in ridership as a result of service level increases would impact both populations equally.

Access+:

For Access+, we did consider that the total trips per registrant would stay consistent. However, in both cases, conventional and Access+, ridership increases due to service hour extensions, such as providing service later in the evening or on weekends, will not have an impact on the number of vehicles required. This is because the same vehicles used to accommodate peak period ridership can be used in these off-peak periods. That is to say, the total ridership could increase without needing to expand the fleet, as the boardings per vehicle overall could increase. In this case, the boardings per peak vehicle are expected to increase from approximately 3,000 to 3,800.

As noted on page 74, the demand for access+ trips is highest between 3:00 pm and 4:00 pm; this is the period that needs to be considered for peak period vehicle requirements. It is not expected that additional trips can be accommodated in this period without an increase in the number of vehicles, and it is not expected that existing residents who qualify for the service will make more trips during this period than they already do. If we were to apply a higher number of overall trips per registrant as the service level increases, that would be applied to both the existing and growth populations, as both will benefit from the service hour extensions equally, thus resulting in the same benefit to growth. Based on this, the growth in the number of vehicles is required to accommodate trips from new residents and residents who will become disabled and require use of the service, which we use age to estimate.

We applied the assumption that the denial rate or unaccommodated trip rate would remain the same as it is today (0.45%) because of the note on page 80 of the Five-year Service Plan indicates that "to maintain similar service quality to today, it is expected that service hours would need to increase in line with projected ridership growth". If we were to remove this assumption and suggest that the reliability would be improved such that there were no trip denials, the BTE would increase to 12.0%; however, most transit agencies across the country continue to have a denial rate even when service levels are increased.

Land

11. Can the assumed land areas associated with each of the library branches, recreation facilities, public works facilities, fire stations, and road widenings be provided?

Proj. No.	Project Description	Land Area (acres)	Land Classification	Comments
Land - 10 Year				
Library				
1	Branch - PH4 - Britannia	1.69	Urban Low/ Medium Density Residential	
2	Branch - PH4 - Trafalgar/Agerton	1.65	Urban Low/ Medium Density Residential	
3	Branch - Additional Space Needs - Intensification	0.64	Urban Low/ Medium Density Residential	
4	Branch - MEV & Additional HUSP Growth	0.50	Urban Low/ Medium Density Residential	
5	Branch - Community Area Expansion Area	1.83	Urban Low/ Medium Density Residential	
Recreation Facilities				
6-9	Britannia	11.95	Urban Low/ Medium Density Residential	Land Requirements Per: Twin Pad Arena - 5.3 acres Indoor Pool - 2.12 acres Gymnasium - 0.98 acres Multi-purpose Space - 0.45 acres
10-13	Trafalgar/Agerton	8.85	Urban Low/ Medium Density Residential	
14-17	MEV	9.83	Urban Low/ Medium Density Residential	
18-21	Intensification	9.83	Urban Low/ Medium Density Residential	
22-25	Community Expansion Area	17.70	Urban Low/ Medium Density Residential	
Land - Blended 10 Year and 2051				
Public Works				
26/1	Civic Operations Centre - Sustainable Halton Lands	3.50	Urban Industrial/ Employment Lands	
27/2	Civic Operations Centre - Expansion Area Lands	3.50	Urban Industrial/ Employment Lands	

Proj. No.	Project Description	Land Area (acres)	Land Classification	Comments
Land - 2051				
Fire Stations				
3	Station - Britannia	1.32	Urban Low/ Medium Density Residential	
4	Station - Trafalgar/Agerton	1.32	Urban Low/ Medium Density Residential	
5	Training Facility	1.20	Urban Industrial/ Employment Lands	
6	Apparatus Repair Facility	1.20	Urban Low/ Medium Density Residential	
7	Additional Communications Centre	0.19	Urban Low/ Medium Density Residential	
8	Fire Prevention Office Space	0.12	Urban Low/ Medium Density Residential	
Services Related to a Highway				
9	5th Line Widening (Britannia Road to Lower Base Line) (4 lane)	5.40	Urban Low/ Medium Density Residential	Actual land area required is 10.8 acres. Assumed 50% of land area to be conveyed to the Town under the provisions of the Planning Act.
10	5th Line (Main Street E to Yukon Court)	0.26	Urban Industrial/ Employment Lands	
11	6th Line (Hwy 401 to Derry Road) (4 lane)	1.20	Urban Industrial/ Employment Lands	Actual land area required is 4.93 acres.
		1.27	Greenbelt Designated Land (>15 acres)	Assumed 50% of land area to be conveyed to
12	6th Line Widening (Derry Road to Britannia Rd) (4 lane)	1.85	Urban Low/ Medium Density Residential	Actual land area required is 7.4 acres.
		1.85	Greenbelt Designated Land (>15 acres)	Assumed 50% of land area to be conveyed to
13	6th Line Widening (Britannia to Lower Base Line) (4 lane)	2.50	Urban Low/ Medium Density Residential	Actual land area required is 7.4 acres.
		3.05	Greenbelt Designated Land (>15 acres)	Assumed 25% of land area to be conveyed to
14	Louis St. Laurent Extension (5th Line to 6th Line) (4 lane)	1.50	Urban Industrial/ Employment Lands	Actual land area required is 12.1 acres. Assumed 88% of land area to be conveyed to the Town under the provisions of the Planning Act.
15	Main Street (Trafalgar to west of Hwy 407) (4 lane)	10.38	Urban Industrial/ Employment Lands	Actual land area required is 20.75 acres. Assumed 50% of land area to be conveyed to the Town under the provisions of the Planning Act.
16	Britannia Road (Tremaine Rd to MEV West Boundary) (4 lane)	0.83	Urban Low/ Medium Density Residential	Actual land area required is 1.1 acres. Assumed 25% of land area to be conveyed to the Town under the provisions of the Planning Act.
17	Lower Base Line (Fourth Line to Fifth Line) (2 lane extension)	4.20	Urban Low/ Medium Density Residential	Actual land area required is 8.4 acres. Assumed 50% of land area to be conveyed to the Town under the provisions of the Planning Act.
18	Lower Base Line (Fifth Line to Town East Boundary) (4 lanes)	11.80	Urban Industrial/ Employment Lands	
19	Intersection Improvement Costs	1.00	Urban Low/ Medium Density Residential	
20	Lower Base Line - Tremaine to RR 25 - widening to 4 lanes	2.00	Urban Industrial/ Employment Lands	
		5.30	Greenbelt Designated Land (>15 acres)	
21	Lower Base Line - RR 25 to new JSP - widening to 4 lanes	13.00	Urban Low/ Medium Density Residential	
22	Main Street Crossing (Trafalgar to 407)	5.25	Urban Industrial/ Employment Lands	Represents only the Town's land requirements (exclusive of any land requirements for Mississauga).

12. Can the basis for the land value assumptions be provided, including any supporting appraisal report be provided?

The land classifications used for the various projects are identified in the table provided in response to question 11. The supporting appraisal report has been posted separately on the [Town’s Let’s Talk Milton project page](#). Land values in the DC Background Study are based on the appraisal report plus soft costs including contingency, appraisals, legal, internal project management costs, and capital surcharge.

13. There are approximately \$25 million in costs for ‘intensification’ land purchases for a twin pad, indoor pool, gymnasium and multi-purpose spaces. Does the Town have specific plans or a general location for a new recreation centre in the Town’s existing built-up area?

The Town does not yet have specific plans nor a general location for a new recreation centre to support the needs of the growth that is created in the Town’s built-up area. The Intensification Community Centre is identified as a need arising from the population growth within the Pre-HUSP area; however, the community centre may be located external to the Pre-HUSP lands.

14. Do the costs for projects 22-25 mean to represent two separate twin pads, two separate indoor pools, etc., or are the land costs assumed to be double that of the other specified facilities in Britannia, Trafalgar/Agerton, etc.?

The costs for projects 22-25 utilize the same land costs as the other facilities and reflect the following land areas based on the projected quantity of recreation facilities:

	Quantity	Land Area Per (acres)	Total Land Area Requirements (acres)
Twin Pad Arena	2.00	5.30	10.60
Indoor Pool	2.00	2.12	4.24
Gymnasium	2.00	0.98	1.96
Multi-purpose Spaces	2.00	0.45	0.90
Total Land Area			17.70

15. The BTE for land acquisition costs for road projects does not match the BTE applied to the same base road projects. The table below shows that had the BTE been applied uniformly to the land as it was to the road segment, the BTE for the land

acquisition costs would increase from \$317,200 to \$15,100,098.

Figure 1

Differences in BTE for Road Segment and Land Acquisition Costs, 2025 Milton DC Study

Project #	Road Segment	Land			Roads Project		Roads BTE%	Updated Land BTE to Match
		Cost	BTE	BTE %	Cost	BTE		
9	5th Line Widening (Britannia Road to Lower Base	\$ 15,540,000	\$ -	0%	\$ 29,617,000	\$ 4,442,600	15%	\$ 2,331,026
10	5th Line (Main Street E to Yukon Court)	\$ 749,000	\$ -	0%	\$ 9,478,000	\$ -	0%	\$ -
11	6th Line (Hwy 401 to Derry Road) (4 lane) - Land	\$ 3,960,000	\$ -	0%	\$ 37,902,000	\$ 5,685,300	15%	\$ 594,000
12	6th Line Widening (Derry Road to Britannia Road) (4	\$ 5,860,000	\$ -	0%	\$ 37,687,000	\$ 5,653,100	15%	\$ 879,008
13	6th Line Widening (Britannia to Lower Base Line) (4 lane) - Land	\$ 8,320,000	\$ -	0%	\$ 30,472,000	\$ 4,570,800	15%	\$ 1,248,000
14	Louis St. Laurent Extension (5th Line to 6th Line) (4	\$ 4,280,000	\$ -	0%	\$ 21,407,000	\$ -	0%	\$ -
15	Main Street (Trafalgar to west of Hwy 407) (4 lane)	\$ 29,600,000	\$ -	0%	\$ 30,270,000	\$ -	0%	\$ -
16	Britannia Road (Tremaine Rd to MEV West Boundary)	\$ 2,400,000	\$ -	0%	\$ 5,092,000	\$ 763,800	15%	\$ 360,000
17	Lower Base Line (Fourth Line to Fifth Line) (2 lane extension)	\$ 12,040,000	\$ -	0%	\$ 29,386,000	\$ -	0%	\$ -
18	Lower Base Line (Fifth Line to Town East Boundary) (4 lanes) - Land	\$ 33,420,000	\$ -	0%	\$ 56,645,000	\$ 8,496,800	15%	\$ 5,013,029
19	Intersection Improvement Costs	\$ 3,172,000	\$ 317,200	10%	\$ 3,401,000	\$ 340,100	10%	\$ 317,200
20	Lower Base Line - Tremaine to RR 25 - widening to 4 lanes - Land	\$ 6,420,000	\$ -	0%	\$ 37,371,000	\$ 5,605,700	15%	\$ 963,009
21	Lower Base Line - RR 25 to new JSP - widening to 4lanes	\$ 37,720,000	\$ -	0%	\$ 61,213,000	\$ 5,509,200	9%	\$ 3,394,818
22	Main Street Crossing (Trafalgar to 407)	\$ 14,930,000	\$ -	0%	\$ 18,909,000	\$ -	0%	\$ -
		\$ 178,411,000	\$ 317,200		\$ 408,850,000			\$ 15,100,091

Difference \$ 14,782,891

Source: KR Planning Group Inc. based on Town of Milton 2025 DC Study

The recognition of benefit to existing (BTE) on the road construction projects reflects the road improvements that are anticipated with the reconstruction and urbanization of the road segments that are unrelated to an increase in transportation capacity. These urbanization improvements include streetlighting, sidewalks/multi-use paths, urban tree canopy, urbanized stormwater management, etc. As a result, a deduction of 15% BTE was applied to road urbanizations/widenings to recognize the benefit to the existing community of these improvements.

The land acquisition costs are directly related to increased transportation capacity that is required to support the growth in residential and employment populations over the forecast period. As a result, the land required for the widenings are considered to be fully growth-related with no BTE recognized.

Roads/Public Works

16. Can the background source or supporting study for the roadway values in the LOS inventory on Page B-3 be provided?

For road classifications where the Town has no recent construction history (2 Lane and 3 Lane Arterial, 2 Lane Rural), the roadway values in the Level of Service (LOS) inventory on Page B-3 are based on the 2023 Roads State of the Infrastructure and Funding Analysis Report, indexed to 2025\$ using the construction price index identified in the Development Charges Act.

For 4 Lane and 5 Lane cross sections, the roadway values were based on recent construction costs for Town roads including Thompson Road from Louis St Laurent to Britannia, Main Street from James Snow Parkway to 5th Line and Louis St Laurent from James Snow Parkway to 5th Line, indexed to 2025\$ using the construction price index identified in the Development Charges Act.

The value for the noise fences is based on the 2018 report, indexed to 2025\$.

17. What is the basis for 0% PPB allocation for projects such as 5th Line Widening from Britannia to Lower Base Line scheduled for 2045-2050?

The 2051 horizon was used for Roads to align with the overall growth forecast and buildout of current urban boundary lands. As the capital projects were identified as needed to accommodate the buildout of the urban boundary, no post period benefit (PPB) was identified. In recognition of the concerns raised by the development community, staff are further reviewing the projects towards the end of the 2051 buildout period to determine if any PPB is appropriate, with edits expected by way of the issuance of an addendum.

18. What is the nature of the “Lower Base Line - 4th Line to 5th Line (2 Lane Extension)” project? Is this part of the reconfiguration once James Snow Parkway is extended southward? Does this overlap with the segment of LBL from 4th to 5th Line captured in project 17?

The “Lower Base Line - 4th Line to 5th Line (2 Lane Extension)”(project 21 on Services Related to a Highway; project 17 on Land - 2051) is identified in the 2025 TMP Update as a new two lane roadway from the current south terminus of 4th Line at Lower Base Line to 5th Line. This is a new road segment south of the existing Lower Base Line between 4th Line and 5th Line, which will remain part of the Town’s road network. The 2025 TMP update identifies this as a “medium term” project with a 2041 horizon.

The Lower Base Line - RR25 to JSP - widening to 4 lanes (project 26 on Services Related to a Highway; project 21 on Land - 2051) includes the future widening of the segment from 4th Line to JSP from 2 to 4 lanes.

19. Has the Town studied the feasibility of the 2-to-4 lane widening of Lower Base Line from Fifth Line to Town East Boundary? Is this widening for the entire length from Fifth Line eastward?

The 2025 TMP Update identifies a widening of Lower Base Line from 5th Line to the Town’s east boundary in the long term (2051 horizon). A feasibility study has not been completed at this time. The TMP Update currently identifies a widening for the entire length from 5th Line eastward.

- 20. For project 26 - Lower Base Line from RR25 to new JSP,**
- a. Can it be confirmed that the entirety of the \$24.4 million contribution represents the share from Town of Oakville related to the boundary road?**
 - b. How was this share calculated or determined?**
 - c. Does the Oakville share include their respective share of BTE?**

The entirety of the \$24.4 million contribution represents the Town of Oakville's share of the widening of the boundary road. As the entire segment of road is not a boundary road, the gross costs were prorated between the Milton portion of the road (estimated at roughly 2.8km) and the boundary road (estimated at 0.7km) and the boundary road portion was then split 50/50 between the Town and Oakville. As the gross costs were used to determine the shares between the two municipalities, the Oakville portion would include any respective share of benefit to existing (BTE).

21. Regarding the two bridge projects for the Derry Green Union Gas Pipeline easement:

a. Where would the two bridge projects located?

There are potentially bridges to be constructed in the following locations:

1. Between James Snow Parkway and 5th Line
2. Between Clark Blvd and 6th Line.

The streams to be traverses can be see on [Schedule C-9-A of the Derry Green Secondary Plan](#).

b. Does the Town have any plans to connect the sections of gas pipeline trail that terminate on either side of Highway 25?

Trails on either side of 16 Mile Creek are "Active Transportation" trails. They are asphalt, lit and maintained in winter. As further development may occur on the north east corner of #25 and LSL the Town will seek opportunities to connect the area of Featherstone Park south to LSL. South of LSL there will be a lit, asphalt (active transportation) trail on both the west and east sides of 16 Mile Creek.

c. What is the rationale for including the trail in the Roads DC as opposed to the Parks & Recreation DC?

The Town includes trails that are considered part of the active transportation network with the Roads DCs. Trails that are intended for passive recreation use are included with the Parks & Recreation DC. The "Active Transportation" network includes trails such as the Union Gas Trail, 16 Mile Creek Trail and other higher order trails that are asphalt, lit and maintained in the winter. "Passive Recreation Trails" are trails found in woodlot buffers, engineered channels and other connective features. They are limestone in material, not lit and not maintained in the winter. This distinction has been utilized for all of Milton's Secondary Plans.

22. The Town's TMP Update shows in Table 30 the intersection improvement costs totalling \$2,130,000, while the 2025 DC Study shows Intersection Improvement Costs (project 24) of \$3,401,000. What is included in the DC Study that is over and above what is recommended in the TMP Update?

The DC Background Study includes a feasibility study to determine the practicality and viability of intersection improvements at the intersections identified in the TMP. Additionally, the TMP only included an assumed 15% of construction costs for design and permitting; however, did not include other soft costs such as the feasibility study noted above, contract administration, or project management. These costs were included as part of the total project costs in the DC Background Study.

23. There are several projects in the 2025 DC Study that are not listed in the February 2025 TMP Update - can the supporting study or expression of Council's intent to complete the following works prior to 2051 be provided:

a. Main Street (Trafalgar to West of 407) - DC study projects 16 (road construction) and project 29 (bridge)

During the TMP engagement, the City of Mississauga confirmed the City of Mississauga has identified an extension of Argentia Road over Highway 407 into Milton as part of its long-term plans with a time horizon tied to when that area of Milton is developed. Town staff, as part of the new Official Plan, intend to include policy which speaks to working with adjacent municipalities to plan for strategic network improvements that provide cross border transportation connections where necessary.

b. Lower Base Line (Tremaine to RR25 - project 25 and RR25 to New JSP - project 26)

A grade separation is already existing on Lower Base Line, just east of Tremaine, as installed by CN. This need was identified by Town staff to address the CN intermodal development along with the Whitebelt Land development (identified in the DC Background Study as the Community Area Expansion Lands and Employment Area Expansion Lands) that were not considered in the TMP. The TMP did not include these additional lands. With growth for these lands included in the DC Background Study, staff anticipate an E/W corridor will be needed.

c. 5th Line Widening (Britannia to Lower Base Line) - project 5

Due to the identification of the Community Area and Employment Area Expansion Lands, staff anticipate that widening of this road segment will be identified as a need, subject to further study (MCEA) to accommodate the population and employment growth of these areas.

d. Britannia Road (Tremaine to MEV West Boundary) - project 20

This project was identified in the 2025 TMP Update for widening from 2 to 4 lanes, in the medium term (2041 horizon).

The Main Street (Trafalgar to West of 407) road construction and bridge (projects 16 and 29) and the 5th Line Widening (Britannia to Lower Base Line) (project 5) were included in the 2021 DC Background Study. Through report CORS-028-21, Council adopted the project listing of the 2021 DC Background Study. It is the intention similar Council approval of the intent to complete the works identified in the 2026 DC Background study will be obtained when the DC Background Study and By-law are presented to Council for approval.

24. Can the Town provide additional details regarding the nature of the work for the “Main Street E MTSA South Side (Wilson to Thompson)” project (#23)?

Main Street East connects Milton’s arts district in the east to its historic downtown in the west. This arterial road passes through Downtown Milton GO Protected Major Transit Station Area. As such, it is planned to accommodate significant employment and population growth, being a focal area for major residential, commercial and institutional developments. In accordance with provincial policy, all major transit station areas should be planned and designed to be transit-supportive and to achieve multimodal access to stations and connections to nearby major trip generators by supporting transit service integration and commuter pick-up/drop-off areas; accommodating a range of mobility needs; and supporting active transportation. Main Street East is envisioned as a landmark street and a destination. The Town’s Mobility Hub Study shared key recommendations for the future of Main Street East, to support the anticipated redevelopment and intensification of the area:

- Transition from an automobile-oriented street to a green corridor, supporting seamless movement between all modes of transportation and placing special priority on accessibility and safety.
- Enhance the public realm along Main Street East through widened sidewalks, cycling infrastructure and active building frontages.
- Serve as a green corridor prioritizing cyclists and pedestrians.

25. Can the nature of Project #6 - “Fifth Line Intersections (LSL to Britannia)” be provided in more detail than shown in the DC study? Are these projects part of the committed works, completed or in-progress already?

This project is for two (2) intersections along Fifth Line between Louis St Laurent and Britannia Road. These costs are not included in current committed works and are not in-progress nor completed. The exact locations of these intersections will be determined through future planning stages of the Britannia Secondary Plan and are therefore, not being constructed in conjunction with the widening of Fifth Line.

26. It is my understanding that there are improvements are planned for Eighth Line including widening and urbanization of the existing roadway. Can the rationale for why these projects have not been included in the DC Study be provided?

Eighth Line is identified as a collector roadway within/adjacent to the Trafalgar Secondary Plan. As per section 1)b. of the Town's Local Service Policy, included as Appendix E in the DC Background Study, a collector road is identified as a direct developer responsibility when the improvements/construction are required to support the development as assessed through the transportation master plan and/or road needs assessment studied through the secondary plan process or other planning process. As the improvements (urbanization to current Town collector standard) to Eighth Line were identified as necessary to support the development of the Trafalgar Secondary Plan, they have been determined to be direct developer responsibility and therefore, not included in the DC Background Study. The Local Service Policy applies to collector roads both internal and external to the development.

27. For road projects with timing of 2045-2049, why is there no PPB assigned? Are these new areas anticipated to be fully built-out and utilizing the full extent of the created capacity by 2051?

The 2051 horizon was used for Roads to align with the overall growth forecast and buildout of current urban boundary lands. As the capital projects were identified as needed to accommodate the buildout of the urban boundary, no post period benefit (PPB) was identified. In recognition of the concerns raised by the development community, staff are reviewing the projects towards the end of the buildout period of 2051 to determine if any PPB is appropriate, with edits expected by way of the issuance of an addendum.

28. What costs are included in the various operations centre projects, and what does the "1/3rd share attributed to Stormwater Services" for each facility mean in terms of services that stormwater management facilities will need? How have the stormwater services costs been incorporated into the DC study rate calculations?

- Operations Centre Phase 2 - \$16.35 million
- Civic Operations Centre - Sustainable Halton Lands - \$19.56 million
- Civic Operations Centre - Expansion Area Lands - \$15.56 million
- Bridge at Operations Centre - \$6.46 million

Under legislation, a DC By-law may provide for any eligible service to be included in a class set out in the by-law. Public Works is proposed as a class of service comprised of Services Related to a Highway, Parks and Recreation Services, Stormwater Services, and Provincial Offences Act (POA), including By-law Enforcement. The gross costs of the operations centre projects were developed using an average cost per square foot multiplied by the projected size of the facility. These costs include all construction and associated soft costs, excluding land. The operations centre(s) support a variety of Town services and the DC Background

Study allocated the operations centre costs equally between three services: services related to a highway, stormwater services, and parks and recreation. The allocation between services is used to determine the split between residential and non-residential growth as services related to a highway and stormwater services are allocated 77% residential/23% non-residential while parks and recreation is allocated 95% residential/5% non-residential. The stormwater costs are included as part of the overall public works charge.

Parks and Recreation

- 29. Why was a 2051 horizon used for Parks & Recreation when the Town is in the process of updating its Parks and Recreation Master Plan, which the Town's website states will "act as a roadmap...throughout the next five years (2026-2031)." What are the planned facilities in the capital project list based on, particularly those beyond the 10-year planning horizon?**

The 2051 horizon was used for Parks and Recreation to align with the overall growth forecast and buildout of current urban boundary lands. The Parks and Recreation Master Plan is a short-term implementation plan that does not study the full-term of the anticipated 10-year term of the DC By-law. The planned facilities in the capital project list are based on current service standards applied to the anticipated population growth in the 2051 horizon.

- 30. To what extent does the DC study's inclusion of parkland development projects recognize the existing Master Parks Agreements and the requirements for landowners to provide and construct parks in newly developing areas?**

The DC Background Study generally aligns with the parkland quantum and classifications identified in the executed Master Parks Agreements for the applicable development areas. The cost estimates assume the land is conveyed to the Town at the base park conditions, in accordance with the Town's Engineering and Parks Standards Manual, as outlined in the agreements. Although the Master Park Agreements permit the construction of the parks by the Owner, the cost for construction in excess of the base park condition, and actual construction of all park facilities within the parkland dedication in the applicable development areas is the sole responsibility of the Town. These capital construction costs have been included in the DC Background Study.

- 31. Does the Town have a detailed breakdown with respect to how the cost estimates for the various new recreation facilities were calculated? This request is for detailed 'project sheets' that show base construction costs, soft costs, adjustments, contingency assumptions, landscaping, land acquisition assumptions, etc.**

The cost estimates for the recreation facilities are based on average costs per square foot of construction plus soft costs and land. The base construction costs

were determined through a review of various comparable builds in other GTA municipalities (indexed to 2025\$) and consideration for the Altus Group 2025 Canadian Cost Guide. A construction cost of \$830 per square foot was assumed, which is towards the lower end of the range for multi-use recreation centre costing in the Altus guide (ranges from \$670 to \$1,160 per square foot). Soft costs were applied as a percentage of the base construction cost per square foot as presented in the following table:

Design/ Contract Administration	Contingency	Furniture/ Fixtures/ Equipment	Site Investigations/ Permits/Fees	Project Management	Capital Surcharge
12%	10%	2%	1%	3%	3%

The square footage assumption for the various recreation facilities are as follows:

Community Facility	Facility Size (square feet)
Arena - Twin Pad	77,000
Indoor Pool	30,800
Gymnasium	14,300
Multi-purpose Spaces	6,600

Land acquisition assumptions are provided in response to question 11 above.

32. What lands are meant to be captured by the projects for lands “External to Secondary Plans”?

There are three (3) park developments included in the parkland development External to Secondary Plans: two (2) anticipated community parks and one (1) district park. The Town has acquired 133 acres of land along 6th Line, inclusive and south of the pipeline corridor, that is planned to be developed as a community park. The Town is planning for future land acquisition for a community park and a district park. It is currently anticipated these additional parks will be located external to secondary planning areas.

33. What is the nature of the \$7.34 million line item for “Event Space”?

The Town has identified a need for large event space and has determined that each community park will include event space similar to the event space within the existing Milton Community Park. Event space is an outdoor location within a community park that can be rented to accommodate large community events, with over 1,000 attendees. The space includes, open lawn area, asphalt walkways with lighting, electrical servicing, shade shelters, site furnishings, landscape amenities,

and is adjacent to parking and park facilities. The Town is planning for the development of two (2) additional community parks.

34. What is the basis for including 50% of school lands and other school facilities in the Parks & Recreation LOS inventory?

The Town includes 50% of school lands and other school facilities in the parks and recreation level of service (LOS) inventory as these lands contribute to the overall passive parkland provided to the community and reduce the requirement for the Town to directly provide. These lands are maintained by Town operations staff through the Reciprocal Agreement and the Town has supported investment in playground equipment on these sites through a grant program. The 50% inclusion rate represents the portion the lands are available for general public use, outside of school hours. Although these lands form part of the Town's service delivery, to be conservative the Town will remove school lands and other school facilities from the level of service inventory via the issuance of an upcoming addendum.

a. What Town costs have been incurred such that they would reflect Town replacement costs of \$120,000 per acre?

The replacement costs per acre for the school grounds represent the value of the passive parkland available for community use. Without these lands available for community use, the Town would be required to increase its provision of passive parkland at the cost reflected in the LOS inventory.

b. Does the Town have reciprocal agreements with school boards allowing schools to use Town parks similar to those used by the Town of Halton Hills that offset Town usage of schools with school-board usage of Town facilities?

Yes, the Town of Milton and all Region of Halton municipalities are each a signatory to the Reciprocal Agreement with the Halton District School Board and the Halton Catholic District School Board. At the end of each calendar year, a financial reconciliation is completed between the Town and each school board as it's never a net-zero offset.

c. In the same way that a share of non-Town facilities (Maplehurst, CK SS, etc.) are included, has the Town made the appropriate deduction for the extent to which Town facilities are used by school boards or other third-party organizations?

A deduction for the school boards usage of Town facilities was not made on the service standards as their usage of Town facilities is nominal when compared with the broader community usage of those same facilities.

- 35. Is the inclusion of the “Maplehurst Diamond” double-counted with the separate inclusion of the “Hardball/Baseball - (lit) (Maplehurst)” line item?**

The Maplehurst Diamond under the Parkland Development service relates to the base land area occupied by the diamond and the costs for basic parkland development. The Hardball/Baseball (lit) (Maplehurst) item on the Outdoor Recreation Facilities and Parkland Amenities service reflects the costs to develop the parkland into a hardball/baseball facility. These items are not double-counted but rather split between base parkland development and facility costs.

- 36. Can a detailed breakdown and inventory of “Linear Parks” and “Recreation Trails” be provided to ensure there is no double counting between the two?**

Linear Parks on the Parkland Development level of service (LOS) inventory represents the acres of land owned by the Town classified as linear parks while the Recreation Trails LOS inventory represents the linear metres of the various trail types. The replacement cost for the Linear Parks is reflective of the capital cost for the development of the lands, exclusive of the capital costs for the construction of any associated trail as those costs are separately identified on the Recreation Trails LOS inventory. The recreation trails include trails through linear parks as well as through woodlots, natural heritage systems, adjacent to stormwater ponds, etc.

- 37. Can the Town provide the basis for the cost increase of the Boyne CC from \$58.5 million in the 2021 DC Study to \$141.6 million in the 2025 DC Study, a 142% increase in five years? How much land acquisition costs were included in the 2021 cost estimate?**

Change in Capital Costs for Recreation Facilities, Town of Milton DC Studies

	2021 DC Study	2025 DC Study	% Change
Boyne CC	\$ 58,490,000	\$ 141,570,000	142%
Britannia			
Arena	\$ 44,225,000	\$ 84,700,000	92%
Indoor Pool	\$ 18,493,000	\$ 67,760,000	266%
Gymnasium	\$ 11,216,000	\$ 31,460,000	180%
Multi-Purpose Spaces	<u>\$ 2,728,000</u>	<u>\$ 7,260,000</u>	166%
Total	\$ 76,662,000	\$ 191,180,000	149%
Trafalgar/Agerton			
Arena	\$ 29,483,000	\$ 84,700,000	187%
Indoor Pool	\$ 18,493,000	\$ 33,880,000	83%
Gymnasium	\$ 5,608,000	\$ 15,730,000	180%
Multi-Purpose Spaces	<u>\$ 2,728,000</u>	<u>\$ 7,260,000</u>	166%
Total	\$ 56,312,000	\$ 141,570,000	151%
MEV			
Arena	\$ 14,742,000	\$ 84,700,000	475%
Indoor Pool	\$ -	\$ 33,880,000	n.a.
Gymnasium	\$ -	\$ 31,460,000	n.a.
Multi-Purpose Spaces	<u>\$ -</u>	<u>\$ 7,260,000</u>	n.a.
Total	\$ 14,742,000	\$ 157,300,000	967%
Intensification/Pre-HUSP			
Arena	\$ 14,742,000	\$ 84,700,000	475%
Indoor Pool	\$ 36,987,000	\$ 33,880,000	-8%
Gymnasium	\$ 11,216,000	\$ 31,460,000	180%
Multi-Purpose Spaces	<u>\$ 5,456,000</u>	<u>\$ 7,260,000</u>	33%
Total	\$ 68,401,000	\$ 157,300,000	130%

Source: Town of Milton 2021 and 2025 DC background studies

The 2021 DC cost estimate for the Boyne Community Centre did not include any land costs as the recreation facility is planned for construction on lands conveyed to the Town through the Boyne Financial Agreement. There has been no change to the Boyne Community Centre facilities (1 twin pad arena, 1 gymnasium, 1 multi-purpose space) between the 2021 and 2025 DC Background Studies. The cost increase is reflective of the increase in the costs of construction, with the 2025 DC Background Study budget for the Boyne Community Centre being based on the assumptions provided in question 31 above. The average cost per square foot of construction assumed in the 2021 DC Background Study was \$343. This increased to \$830 per square foot in the 2025 DC Background Study which is reflective of recent builds in other GTA municipalities and is below the mid-range of the Altus 2025 Canadian Cost Guide.

38. The capital costs for other recreation facilities have all increased substantially since the 2021 DC Study, with several apparent changes in the scope of projects. For example, the Britannia Recreation Facility has a 266% increase in costs for Indoor Pool, which may be a change in plan from one (1) pool to two (2) pools. Can the change in costs be split out between estimated capital cost inflation and changes to scope of work?

Due to changes in estimated population across the Town and within the various secondary plan areas, the scope of each of the community centres was re-evaluated through the 2025 DC Background Study process with facilities being grouped together resulting in more comprehensive community centres that will result in improved operational efficiencies and enhanced community benefit of colocation. The following table summarizes the overall changes in community centres from the 2021 DC Background Study to the 2025 DC Background Study, exclusive of the new community centre identified for the Community Area Expansion Lands.

Facility Type	2021 DC Study (Excluding Land)		2025 DC Study		Change			
	Qty	\$	Qty	\$	Qty	\$	Capital Cost Inflation	Scope Changes
Arena (Twin Pad)	4.00	106,272,000	4.00	338,800,000	-	232,528,000	232,528,000	
Indoor Pool	4.00	69,308,400	5.00	169,400,000	1.00	100,091,600	66,211,600	33,880,000
Gymnasium	6.00	30,398,300	7.00	110,110,000	1.00	79,711,700	63,981,700	15,730,000
Multi-Purpose Space	4.00	9,912,400	4.00	29,040,000	-	19,127,600	19,127,600	
Total		215,891,100		647,350,000		431,458,900	381,848,900	49,610,000

The overall change in scope to address increases in planned population is the addition of one (1) indoor pool and one (1) gymnasium, which accounts for \$49.61 million of the overall \$431.5 million increase in estimated capital expenditures. The remaining is due to inflationary pressures. Detailed assumptions for capital costs for these facilities is provided in response to question 31.

Library

39. Are there estimated sizes/square footage for the four branches (project numbers 1, 2, 3 and 6) each of which has a capital cost of \$22-\$25 million? Will these branches be co-located with the recreation centres included in the DC study?

The following table provides the estimate square footages for each of the four library branches requested:

Proj. No.	Project Description	Size (sq ft)
1	Branch - Boyne	23,300
2	Branch - PH4 - Britannia	24,600
3	Branch - Trafalgar/Agerton	23,900
6	Branch - Community Expansion Area	26,500

The Boyne Branch will be co-located with the Boyne Community Centre and it is anticipated that the Trafalgar/Agerton Branch will also be co-located with the community centre. The location of the Britannia and the Community Expansion Area branches will be determined as planning for those secondary plan areas progresses.

40. What is the rationale for utilizing a 2051 planning horizon for libraries when the Library Strategic Plan from January 2025 uses a 2041 horizon?

The 2051 horizon was used for Library to align with the overall growth forecast and buildout of current urban boundary lands. Similar to the Parks and Recreation Master Plan, the Library Strategic Plan is a short-term implementation plan that does not study the full-term of the anticipated 10-year term of the DC By-law. The planned facilities in the capital project list for libraries are based on current service standards applied to the anticipated population growth in the 2051 horizon.

Questions and Comments - CBC Study

41. How were the CBC-eligible share of high-density housing units determined in Table 2-2 of the CBC Study?

The CBC eligible share of high-density units in Table 2.2 was determined by reviewing recent and active high-density development applications (including registered, draft-approved, and proposed) and identifying those buildings that meet the C.B.C. criteria (i.e., five or more storeys and 10 or more residential units). Within the Town's active development applications, C.B.C.-eligible apartment buildings represent about 66% of all high-density units. Applying this ratio, it is assumed that 66% of the Town-wide high-density housing units over the 2025-2051 period will be C.B.C. eligible.

42. Can the Town share the appraisal report referenced on page 2-9 that supports the value of \$11.12 million per hectare for high-density land and \$5.68 million per hectare for low-density land?

The supporting appraisal report has been posted separately on the [Town's Let's Talk Milton project page](#).

43. Has the Town undertaken a Parks Plan to estimate the extent to which their current parkland inventory may be surplus or in deficit relative to the parkland service provision target of 1.75 hectares per 1000 persons?

A Parks Plan was undertaken in 2021 that established the 1.75 hectares per 1,000 population target. The Town is currently undertaking a Parks and Recreation Master Plan that will review the service standard; however, the report is not yet available. Per the level of service inventory for parks and recreation, the Town's provision of parkland totaled 605.81 acres, or 245.16 hectares, in a combination of community parks, district parks, neighbourhood parks and village squares. A total of 261.65 hectares of parkland would be required to achieve the parkland provision target to support the 2024 population of 149,516 persons. As a result, the current parkland inventory is in a deficit position of 16.5 hectares, or 0.11 hectares per 1,000 population. Although other parkland classifications on the level of service inventory provide passive recreation opportunities, they are not included as contributing to the parkland provision target as they are not suitable for active outdoor recreation facilities and park needs.

44. Can the Town clarify what the approach would be for situations where a developing landowner would provide parkland that exceeds the 10% cap from the Planning Act as an in-kind contribution towards the CBC payable? For example, if a landowner provided 14% of its site area as parkland, it would suggest that the developer can meet both its parkland requirements towards the 10% cap and the full CBC at the 4% cap.

The draft Community Benefits Charge By-law does not apply to any development where the Town has entered into a parkland agreement for the dedication of parkland or cash-in-lieu payments that are in addition to the requirements under section 42 or 51 of the Act. Each situation will require an evaluation by Town staff at the time of the specific development application to determine if the incremental parkland dedication (over and above the Planning Act requirements) proposed for the development supports the Town's provision of park amenities and outdoor recreation facilities. If the Town determines the proposed additional parkland aligns with the Town's parkland needs, the Town will enter into a parkland agreement for the additional land and the CBC By-law will no longer apply to the subject development.

Delta Urban - Milton Phase 4 (West) Landowners Group Inc.

Questions and Comments - DC Study

(Note - The original question or comment submitted is presented below in **bold font**, while the Town's response is provided in standard (non-bolded) font.)

General Comments:

- 1. The new DC rates proposed as part of this background study demonstrate a significant increase when compared to the previous background study. Single and Semi-detached dwelling units are proposed to increase by ~38% for development within the Britannia Secondary Plan (BSP) from \$30,299 to \$41,932 and an even greater increase of ~47% for Townhouse units from \$22,785 to \$33,456.**

Noting the Town's justification for the increase in DCs is to account for future growth, projects contained within the DC Background Study should be reviewed thoroughly to ensure their timing falls within the 2025 to 2051 time horizon and to ensure only projects expected to be initiated within this horizon are included in the DC Background Study. This will aid in reducing DC charges, similar to the endeavors by other municipalities across the GTHA like Vaughan and Mississauga, who have significantly reduced DC Charges in recognition of the current housing market conditions. Other municipalities, like Burlington, are considering the elimination of residential DCs for a set number of years to combat housing affordability.

The capital projects identified in the DC Background Study are required to support the population and employment growth forecast for the projected 2051 buildout of the Town's urban boundary. In response to the concerns raised by the development community through the public consultation process, staff are further reviewing the projects towards the end of the 2051 buildout period, with edits expected by way of the issuance of an addendum.

Services Related to a Highway:

- 2. Fourth Line: The BSP identifies Fourth Line as a Collector Road; however, the Town has not identified any projects for Fourth Line within the boundaries of the BSP. The Central-West Tertiary Plan is currently underway and has identified a potential widening requirement to a 4-lane cross section. As traffic on this roadway will not be limited to the future residents of the BSP area, any such improvements should be DC-funded and include design, land acquisition, and construction. The timing of this project should be coordinated with Halton Region's construction of the Sanitary/Water projects on 4th Line.**

Section 1 of the Town's Local Service Policy, included as Appendix I of the DC Background Study, indicates that all collector roads, both internal to and external/adjacent to development are direct developer responsibility under s. 59 of the Development Charges Act. As Fourth Line is identified as a collector road, it was not included as a capital cost in the DC Background Study. Further, at this time, there is no approved study identifying a potential widening to 4 lanes for Fourth Line (the Town's TMP update nor the Britannia Secondary Plan TMP). Should there be a widening identified to 4 lanes and a change in classification to an arterial road for Fourth Line as part of another study, once approved, this project would be added to the Town's capital plan and funded from development charges, as appropriate and through established budget procedures.

- 3. Thompson Road (Third Line) - South of Britannia Road: The BSP identifies Thompson Road south of Britannia Road as a Collector Road; however, the Town has not identified any projects for Thompson Road within the boundaries of the BSP which may require urbanization as the surrounding lands develop. Any such improvements should be DC-funded.**

Section 1 of the Town's Local Service Policy, included as Appendix I of the DC Background Study, indicates that all collector roads, both internal to and external/adjacent to development are direct developer responsibility under s. 59 of the Development Charges Act. As Thompson Road (Third Line), south of Britannia Road, is identified as a collector road, it was not included as a capital cost in the DC Background Study. The expectation of the Town is that Thompson Road (Third Line) south of Britannia Road would be urbanized to a current Town of Milton collector standard, as a direct developer responsibility through the build out of the Britannia Secondary Plan, in line with the Local Service Policy.

- 4. Louis St. Laurent Extension & EA (Projects 12 & 13 - Table 5-4): Please confirm the timing for the construction of the Louis St. Laurent (LSL) extension from 5th Line to 6th Line and the EA for the LSL extension from 5th Line to Trafalgar Road. The DC Background Study identifies the timing for the EA as 2026 and construction as 2027-2029; however, discussions with the Town have advised the Group that the EA is expected to commence in 2027, pushing back the timing for the design and construction of the extension accordingly.**

The Town's current capital plan has the commencement of the MCEA for the extension of Louis St. Laurent (LSL) (from 5th Line to Trafalgar) identified in 2026. Following this, the design for LSL from 5th to 6th Line is identified to start in 2028, with construction identified in the capital plan for a 2029 start (exact timing of construction start will depend on several factors - including land acquisition and external agency approvals). The design and subsequent construction for LSL from 6th Line to Trafalgar is currently outside of the Town's ten-year capital forecast (post 2035). Timing for these projects are reviewed annually as part of the Town's budget process, and may be adjusted accordingly.

5. **New Arterial Road from Louis St. Laurent to Britannia Secondary Plan Boundary (Project 28 - Table 5-4):** The new Arterial Road from Louis St. Laurent to the boundary of the BSP is identified in the Town's DC Background Study as project 28; however, the Region is also carrying a line item (project 6757) for the extension of 5 ½ Line between Britannia Road and Steeles and includes an interchange at highway 401 at a total cost of ~\$182 million. Clarification is requested regarding how this project will be treated if the Region advances construction of this segment of the road. Further, it is our understanding that the Region currently has an EA underway to assess this new road (Regional project PR 3128). We believe it is too premature to prescribe the location and details regarding this road segment without the completion of the Region's EA. If the Region does not proceed with a Regional Road, additional capacity requirements for the Britannia Secondary Plan area will be assessed and confirmed as part of the supporting Road Needs Analysis.

If Halton Region advances the construction of the New North Halton Regional Road (formerly 5 ½ Line), along the same corridor/alignment as this potential arterial road north of Louis St. Laurent to the north limit of the Britannia Secondary Plan boundary, then this arterial road project becomes moot and would be removed from the Town's capital plan. Design and Construction of a Regional Road corridor here would have to be coordinated between the Region, the Town, and the Britannia Secondary Plan landowners.

In recognition of the concern noted, and to avoid the potential for duplication with the Region's development charge, Project 28 will be removed from the Town's development charge calculation via the issuance of an addendum to the study.

Transit Service:

6. **Britannia Terminal (Project 9 - Table 5-2):** The Town has assigned a cost of ~\$2.5 million for a transit terminal within the Britannia Secondary Plan which is considerably more than the costs attributed for the Kennedy Circle Terminal. Please confirm the basis for the valuations used in the DC Background Study and the Transit Technical Appendix attached thereto (Appendix G).

Additionally, the DC Background study does not include a land component for the Britannia Terminal in the 10-Year Services table (Table 5-9). Further clarification is requested on if it is the Town's desire to utilize Town-owned land for this infrastructure.

The Kennedy Circle Terminal is an on-street treatment with passenger amenities to accommodate bus layover and transfers while the Britannia Terminal is planned as off-street, dedicated bus laybys with passenger amenities. Land was not included in the DC calculation for the Britannia Terminal as it is anticipated the lands will be dedicated to the Town as the tertiary plan proceeds in this area.

Parks and Recreation Services:

- 7. District & Community Parks (Projects 142 & 143 - Table 5-7):** The Town has assigned a cost of ~\$4.7 and ~48.5 million for District Parks and Community Parks, respectively, which are “External to Secondary Plans”. We request an itemized breakdown of these line items to confirm where these parks are to be located and the areas they are intended to service.

Further, considering the Town of Milton has entered into various agreements with landowner groups tied to various Secondary Plans for the provision of parkland above and beyond the requirements of the Planning Act, please clarify how these agreements are accounted for in the DC Background Study and DC charge calculations for the affected Secondary Plan areas.

The Town is planning for two (2) community parks and one (1) district park external to secondary plans. The Town has acquired 133 acres of land along 6th Line, inclusive and south of the pipeline corridor, that is planned to be developed as a community park. The Town is planning for future land acquisition for a community park of similar size as well as a district park of approximately 10 hectares. Community and district parks are typically destination parks for the broader town-wide community as they generally contain multiple outdoor recreation facilities and larger community gathering spaces and as such, are not intended to service a specific neighbourhood or development area.

The DC Background Study generally aligns with the parkland quantum and classifications identified in the executed agreements tied to the various secondary plans for the provision of parkland. The cost estimates assume the parkland quantum is provided to the Town in accordance with the agreements for both condition and size/type of park. The capital costs have estimated facility fits for outdoor recreation facilities and parkland amenities based on the size/type of parkland to be conveyed and the Town’s provision standards. The parks and recreation service is calculated as a town-wide charge.

- 8. Britannia Recreation Facilities (Projects 2, 3, 4 and 5 - Table 5-7):** The Background Study identifies \$191.8 million in gross capital costs for new recreation facilities within the Britannia Secondary Plan area, with an anticipated delivery horizon of 2035+. We request a detailed, itemized breakdown of these capital cost estimates, including specific site locations and facility components. Are these facilities to be included within the Community Centre lands within Britannia that the Town is to acquire and if so, what is the size of land required to facilitate the planned facilities?

We request clarification regarding the service area for these facilities. Specifically, do these costs account for the recreational needs of both the approved Britannia Secondary Plan and the future Britannia Expansion Lands both West and East? We seek confirmation on whether these facilities are

planned within the current Secondary Plan area or are they to be to be situated within the off-site Community Park.

Finally, we request clarity on how the costs have been apportioned between the various development areas.

The Britannia Community Centre project is planned to contain one (1) twin-pad arena, two (2) indoor pools (each with a competition and leisure pool), two (2) gymnasiums, meeting space and a branch library. Based on the Town's service standards for recreation facilities, the Britannia Community Centre will generally meet the service needs of the Britannia Secondary Plan, exclusive of the Britannia Expansion Lands both West and East. An additional community centre has been identified in the DC Background Study to address the service needs of the Community Expansion Lands, which include both the East and West Britannia Expansion Lands.

A specific location for the facility has not yet been confirmed; however, the Centre is intended to be located within the Community Centre lands within the Britannia Secondary Plan. It is estimated the facility will require 13.64 acres (11.95 acres for the community centre, 1.69 acres for the library branch) of land for its development.

The cost estimates for the recreation facilities are based on average costs per square foot of construction plus soft costs and land. The base construction costs were determined through a review of various comparable builds in other GTA municipalities (indexed to 2025\$) and consideration for the Altus Group 2025 Canadian Cost Guide. A construction cost of \$830 per square foot was assumed, which is towards the lower end of the range for multi-use recreation centre costing in the Altus guide (ranges from \$670 to \$1,160 per square foot). Soft costs were applied as a percentage of the base construction cost per square foot as presented in the following table:

Design/ Contract Administration	Contingency	Furniture/ Fixtures/ Equipment	Site Investigations/ Permits/Fees	Project Management	Capital Surcharge
12%	10%	2%	1%	3%	3%

The square footage assumption for the various recreation facilities are as follows:

Community Facility	Facility Size (square feet)
Arena - Twin Pad	77,000
Indoor Pool	30,800
Gymnasium	14,300
Multi-purpose Spaces	6,600

As the parks and recreation service is calculated on a town-wide basis, there is no apportioning of costs between the various development areas.

David Schaeffer Engineering Ltd. - Milton P4 Trafalgar Landowners Group

Questions and Comments - DC Study - 4-March-2026

(Note - The original question or comment submitted is presented below in **bold font**, while the Town's response is provided in standard (non-bolded) font.)

1. DC Reserve Fund Balance adjustments (Table 4-2)

- **DC Reserve Fund Balance (Dec 31, 2024) includes "Outstanding Commitments" as per the annual DC Statement. Table 4-2 in the DC further adds "2025 Approved Capital Projects not reflected in Capital Project listings". Have these been double counted within "Outstanding Commitments" of the DC Reserve Fund Balance?**
- **The Town has provided the list of "Outstanding Commitments" in their response to BILD comments. We further request details on the "2025 Approved Capital Projects not reflected in Capital Project listings".**
 - **For example, for 'Services related to Highway' the 2025 Capital Budget (ES-035-24, Appendix 2) included 10 projects requiring DC Funding, several of which are included in the Capital Project Listing in the DC. Excluding these projects, it is unclear how the \$42M in "unlisted" projects was derived.**

The "2025 Approved Capital Projects Not Reflected in Capital Project Listings" monies represent new capital funding approved through the 2025 Capital Budget as well as budget amendments made during 2025 to previously approved capital projects (those already in the Town's work-in-progress). Although the list below includes projects that were also identified as part of the Outstanding Commitments on the annual DC Reserve Fund Treasurer's Statement, the costs are not duplicative. The Town budgets using a modified cashflow method and spreads large projects over multiple years to better reflect anticipated timing of actual spend. For example, a large road construction project may have design and land purchase in year one, followed by utility relocates in year two, and then construction spread across years three and four. This will result in the same project being included in 4 consecutive capital budgets. Additionally, other projects, such as the stormwater monitoring, are annual programs and will therefore appear in both the Outstanding Commitments and 2025 Approved Capital Projects not reflected in Capital Project Listings.

The following table provides the details by project of the 2025 Approved Capital Projects Not Reflected in Capital Project Listings column of Table 4-2:

	2025 Approved Capital Budget	2025 Budget Amendments	TOTAL 2025 Approved Capital Projects Not Reflected in Capital Project Listing
Services Related to a Highway			
C330146 NIPISSING ROAD RECONSTRUCTION	(16,174,859)	8,468,665	(7,706,194)
C339000 ASPHALT OVERLAY PROGRAM - CONSTRUCTION	(1,029,339)	296,523	(732,816)
C339001 ASPHALT OVERLAY PROGRAM - DESIGN	(107,628)	-	(107,628)
C340020 THOMPSON ROAD (LOUIS ST LAURENT TO DERRY RD)	(500,379)	-	(500,379)
C340038 LOUIS ST LAURENT AVENUE (JAMES SNOW PKWY TO FIFTH LINE)	(8,661,270)	-	(8,661,270)
C340054 MAIN STREET (FIFTH LINE TO SIXTH LINE)	(18,599,091)	-	(18,599,091)
C350005 APPLEBY LINE	(636,114)	-	(636,114)
C380108 BOYNE PEDESTRIAN RAILWAY CROSSING	(4,895,124)	-	(4,895,124)
C400113 NEW TRAFFIC SIGNALS	(365,397)	-	(365,397)
C400114 PREEMPTION TRAFFIC CONTROL SYSTEM	(45,126)	-	(45,126)
Total Services Related to a Highway	(51,014,327)	8,765,188	(42,249,139)
Fire Services			
C730123 PERSONAL PROTECTIVE CLOTHING GROWTH	(116,493)	-	(116,493)
Total Fire Services	(116,493)	-	(116,493)
Library			
C801315 REMOTE HOLD LOCKERS	(160,034)	-	(160,034)
Total Library	(160,034)	-	(160,034)
Transit			
C570103 CONVENTIONAL TRANSIT - 12 METRE BUS - GROWTH	(3,055,596)	2,966,598	(88,998)
C570113 NON-FIXED ROUTE BUS (6M) - GROWTH	(156,844)	152,276	(4,568)
Total Transit	(3,212,440)	3,118,874	(93,566)
Growth Studies			
C200123 SPECIAL FINANCIAL STUDIES	(251,546)	-	(251,546)
C900304 ROAD SAFETY STRATEGY	(162,225)	-	(162,225)
C900307 OMAGH STUDIES	-	(583,202)	(583,202)
Total Growth Studies	(413,771)	(583,202)	(996,973)
Public Works			
C460101 1 TON DUMP TRUCKS - GROWTH	(271,652)	(3,190)	(274,842)
C460105 TRAILERS/WATER TANKS - GROWTH	(20,806)	5,681	(15,125)
C460134 3/4 TON PICK-UP - GROWTH	(94,956)	11,644	(83,312)
C460151 COMPACT SWEEPER - GROWTH	(211,356)	-	(211,356)
Total Public Works	(598,770)	14,135	(584,635)
Boyne Stormwater Monitoring			
C440106 STORMWATER MANAGEMENT - BOYNE	(133,569)	-	(133,569)
Total Boyne Stormwater Monitoring	(133,569)	-	(133,569)
Derry Green Stormwater Monitoring			
C440107 STORMWATER MANAGEMENT - DERRY GREEN (BP2)	(120,728)	-	(120,728)
Total Derry Green Stormwater Monitoring	(120,728)	-	(120,728)
Parks and Recreation			
C381003 BOYNE LIMESTONE TRL IN GREENLANDS SYST (E.16 MILE CREEK-JSP)	(295,899)	-	(295,899)
C524004 BOWES NEIGHBOURHOOD PARK - BOYNE	(3,347,601)	174,598	(3,173,003)
C525080 PARK DEVELOPMENT VILLAGE SQUARES-BOYNE	(58,705)	56,523	(2,182)
C525120 APPLE PARK VILLAGE SQUARE - BOYNE	-	(56,523)	(56,523)
Total Parks and Recreation	(3,702,205)	174,598	(3,527,607)
Trafalgar Stormwater Monitoring			
C440111 STORMWATER MANAGEMENT - TRAFALGAR	(133,614)	-	(133,614)
Total Trafalgar Stormwater Monitoring	(133,614)	-	(133,614)
MEV Stormwater Monitoring			
C440109 STORMWATER MANAGEMENT - MILTON EDUCATION VILLAGE	(130,803)	-	(130,803)
Total MEV Stormwater Monitoring	(130,803)	-	(130,803)
Total All Services (as presented in original DC Background Study 19-Dec-2025)	(59,736,754)	11,489,593	(48,247,161)

Through the Addendum Report, additional 2025 budget amendments of \$5.13 million related to the Sherwood Community Centre and Library will be reflected in the 2025 Approved Capital Projects Not Reflected in Capital Project Listings bringing the total down to \$43.12 million.

2. Local Service Policy (Collector Roads)

The local service policy for collector roads (Appendix E, Item A.1.b) has been revised as follows from the 2021 DCBS (changes in red):

Collector Roads External/**Adjacent** to Development, inclusive of all land and associated infrastructure - if needed to support a specific development or required to link with the area to which the plan relates, direct developer

responsibility under s. 59 of the D.C.A. **This includes collector roads that are directly adjacent to/border on the development and that are required improvements to support the development as assessed through the transportation master plan and/or road needs assessment studied through the secondary plan process or other planning process. The developer responsibility on these segments extends beyond the area directly adjacent to/bordering on to the next collector/arterial road intersection as deemed appropriate by an approved transportation study. Otherwise, the collector road will be included in D.C. calculation to the extent permitted under s. 5 (1) of the D.C.A. (dependent on local circumstances) and where possible, land acquisition related to these D.C. project segments will be secured as a required dedication under the Planning Act provisions (s. 41, 51, and 53) with the remainder included in the D.C. calculation.**

- This revised definition is much too broad and suggests that any collector road assessed through a TMP or Secondary Plan could be developer responsibility. In fact, all collector roads are inherently assessed through these processes and therefore it could be argued through this definition that no collector roads should be included in the DC, which is counter to the intent of a DC.
- The previous 2021 definition was sufficiently succinct to be clear that this only applies to collector roads that support only a singular, specific development rather than a collector road required for a broader community catchment. It would only apply for a collector road needed to connect an isolated parcel to the broader “area to which the plan relates” (eg. Secondary Plan), or where a collector road only supports a single plan of subdivision.
- This broader 2025 definition could imply that “specific development” is an entire Secondary Plan area and any external roads would be considered a local service. This is a fundamental change to the definition and is not in line with the intent of DC eligible infrastructure.
- We request the definition revert back to the definition included in previous Milton DCBS's.

The revised definition included within the Local Service Policy (LSP) of the 2025 Development Charge Background Study is reflective of the current and long-standing application of the existing approved LSP. The updated language is intended to provide additional clarity regarding how the policy has consistently been applied to development areas and subdivisions, particularly in identifying collector road improvements that are required to support specific developments.

The Development Charges Act does not currently define what constitutes a local service and municipalities must therefore rely on established practice and functional intent. Town staff have reviewed the various road classifications and determined that collector roads, by their design of ROW widths, transportation capacity, and role in accommodating intra-community traffic, can be considered a local service under section 59 of the Development Charges Act.

The revised wording therefore does not alter the scope of the LSP. It simply provides clearer articulation of existing practice and ensures consistent interpretation moving forward.

3. Eighth Line

- We request Eighth Line from Derry Road to Britannia be added as a DC project. Eighth Line performs a similar function as 5th Line and 6th Line which are included in the DC. Within this segment, Eighth Line is external to the Trafalgar Secondary Plan, and also directly serves the future employment lands east of Eighth Line. Furthermore, the existing road includes a regulated watercourse within the eastern roadside ditch which adds complexity beyond a typical collector road.
- Notwithstanding the Local Service Policy comments above, the Local Service Policy requires two tests:
 - **“Supports a specific development”** - Eighth Line serves more than just a specific development parcel. The Trafalgar Secondary Plan as a whole does not constitute a “specific development.” Eighth Line fronts multiple developments within the Trafalgar Secondary Plan and its improvements are required for the broader community. Furthermore, Eighth Line directly services and abuts other growth areas in the Town including “Future Employment Areas” east of Eighth Line and “Future Complete Neighbourhoods” at the northwest corner of Britannia Road and Eighth Line as indicated in Schedule 2 of OPA 92. Eighth Line improvements support a much broader growth community than a “specific development” - clearly failing this Local Service Policy test and therefore should be included in the DC.
 - **“Link with the area to which the plan relates”** - Eighth Line is not an external collector road that is linking an isolated development to an overall planning area to which a parcel relates. In contrast, it is a collector road that links multiple residential and employment Planning Areas within the Town to major Regional Arterial Roads - clearly failing this Local Service Policy test and therefore should be included in the DC.

Eighth Line is identified with a collector road designation (supported by anticipated traffic volumes to 2051) directly within/adjacent to development, at both the subdivision and secondary/tertiary plan level. The existing condition of Eighth Line is not conducive to the traffic (construction or otherwise) that will result from development of the Trafalgar Secondary Plan as confirmed by the road needs assessment (RNA) completed as part of the Trafalgar Tertiary Plan. The Trafalgar Tertiary Plan RNA assigns traffic flows to Eighth Line and has identified both improvements to existing intersections with Eighth Line as well as new collector road connections/intersections from the proposed residential subdivisions.

The Trafalgar Secondary Plan, and the subdivisions within the Plan, are necessitating improvements/modifications to Eighth Line, including active

transportation facilities, streetlighting, urbanization, and elevation/grade changes to address overall drainage requirements of the development.

Eighth Line is planned as a 20m collector right-of-way (ROW), anticipated to move moderate volumes of intra-community traffic. By comparison, both 5th Line and 6th Line are planned as minor arterial ROWs, anticipated to carry higher volumes of traffic, with ROW widths of 37.5m and 30m respectively. By nature of its collector road classification, ROW width, and need to support development, both at the tertiary plan and plan of subdivision level, Eighth Line has been determined to be a local service under the Town's Local Service Policy.

4. Nipissing Road Reconstruction

- **This project (C330146) was not included in the 2021 DC project list nor in the 2025 DC project list, but has been paid for through DC's as follows:**
 - **300K in DC draws from 2021-2024 per DC Annual Statements**
 - **1.4M in "Committed Spending" included in the DC Reserve Fund Balance Dec 2024**
 - **16.5M in 2025 Capital Budget , presumably included in "2025 Approved Capital Projects not reflected in Capital Project listings" within Table 4-2 of the DC (subject to comment above)**
- **Please provide further details of this project including the project costing details, and the BTE that was applied given this roadway is a reconstruction within an existing urban area.**

The Nipissing Road reconstruction will consist of full depth road reconstruction, curb and gutter, sidewalk, storm sewer repairs, granular base, sub-drains and asphalt surface. The road will be widened to three lanes to provide a left turn lane along the entire road segment to support improved traffic flow driven by project growth in the area.

This project was identified as a need during 2017 and included as a capital project through the 2018 and 2019 capital budgets. At that time, construction was intended to be completed as part of Metrolinx's Milton GO Station expansion project under a proposed cost sharing agreement. The project was not identified in the 2021 DC Background Study as the approved project budgets were reflected in the reserve fund adjustment and no further capital spend was anticipated. A cost sharing agreement with Metrolinx was not undertaken and as a result, the Town's 2024 and 2025 capital budgets included additional costs to complete the Nipissing Road construction works to support the Town's anticipated growth and reflect the full cost of the project.

The total estimated project cost currently approved for the reconstruction of Nipissing Road is \$31.3 million. This project cost includes \$10.3 million of costs recoverable from the Region and developers. Grant funding of \$11.2 million has been allocated to this project resulting in a net capital cost to the Town of \$9.8 million. A benefit to existing of 10% was applied to this project, consistent with the benefit to existing applied to the 2021 DC Background Study for similar

projects (reconstruction of two-lane non-urbanized existing roadway such as projects 12, 16, 17 and 20 of the 2021 DCBS).

5. Appleby Line

- Although costs are relatively minor, please confirm the scope of work that continues to be attributable to growth. There have been minor DC draws for this project for many years and it is unclear what growth-related works continue to be required.

The Appleby Line project was approved through the 2021 DC Background Study, with 90% of the costs identified as benefit to existing. The project included improvements (drainage, geometrics) to Appleby Line from Derry Road north to Rattlesnake Point. Construction was phased for this project with initial focus on the hairpin turn. Coordination with the Niagara Escarpment Commission and utility companies as well as property acquisitions have impacted the construction schedule for the project. No new funding is included for this segment of road in the 2025 DC Background Study. It is anticipated draws from the DC reserve funds will continue through 2027 as construction is completed.

6. Main Street Extension (East of Trafalgar / 407 Crossing)

- The Town's TMP does not address or require an extension of Main Street east of Trafalgar Road and a crossing of the 407 to support growth. This connection would be part of a broader initiative to connect Milton with Mississauga but is not a requirement for growth in Milton to occur. Given the lack of justification to support growth, this \$75M project (Table 5-4, Item 16, 29 and land Table 5-9, item 15, 22) should be removed from the DC.

The Town's 2025 TMP Update did not include or study the expanded urban boundary that has been included in the 2025 DC Background Study; however, during the TMP engagement, the City of Mississauga confirmed it has identified an extension of Argentia Road over Highway 407 into Milton as part of its long-term plans with a time horizon tied to when that area of Milton is developed. This project was included in the 2021 DC Background Study and the project need was reviewed and confirmed by Town staff for its continued inclusion in the 2025 DC Background Study.

In response to landowner feedback regarding projects late in the forecast period and consideration for excess capacity beyond the growth period, a potential for a 10% post period benefit deduction will be included in the Addendum report anticipated for release this month.

7. Main Street Extension (5th Line to 6th Line)

- TMP recommends using \$9.0M for a unit cost for 4-lane extension, which would equate to \$12.6M (excl. crossing).
- The DC appears to include the following construction costs for this project:
 - \$338,789 in DC Reserve Fund Draws from 2022-2024
 - \$663,909 accounted for in DC "Committed Spending"

- \$18,599,091 within the 2025 Capital Budget (is this included in “2025 Approved Capital Projects not reflected in Capital Project listings” in Table 4-2?)
- \$24,180,000 included in DC Recoverable Costs
- Total \$43,781,789 for 1.5 km of road = \$29M/km
- Please provide the detailed project cost sheet to clarify why this road is estimated at ~2.3x the unit cost.

The 2025 Transportation Master Plan Update (TMP) identifies a cost for a 4-lane extension of \$9.0 million per centre-line kilometre. This cost represents construction costs only and does not include soft costs such as design/contract administration, contingency, permit fees, project management, and capital surcharge. Additionally, the costs in the TMP do not include land acquisition costs, structures, or environmental assessments.

As requested, the following table illustrates the detailed project costing. The construction costs for this road segment were calculated using the \$9.0 million per km cost for 1.5km of road as recommended by the TMP.

C340049 Main Street Extension (5th Line to 6th Line)

	Previously Approved Capital Budgets	2025 DC Background Study	Total Capital Cost
Environmental Assessment	806,753		806,753
Land Acquisition	15,017,972		15,017,972
Legal/Appraisal/Other Professional Fees	231,311		231,311
Project Management	321,786	62,500	384,286
Design/Contract Administration	914,298	1,485,000	2,399,298
Roadworks		13,500,000	13,500,000
Structures		4,500,000	4,500,000
Capital Surcharge	558,943	704,000	1,262,943
Contingency	1,683,711	3,928,500	5,612,211
Permit Fees/Other	67,015		67,015
Total Capital Cost	19,601,789	24,180,000	43,781,789

8. 5th Line Widening (Derry to Britannia)

- The DC appears to include the following construction costs for this project:
 - \$2,998,686 in DC Reserve Fund Draws from 2022-2024
 - \$18,599,815 accounted for in DC “Committed Spending”
 - \$39,038,800 included in DC Recoverable Costs (roadworks)
 - \$3,854,000 included in DC Recoverable Costs (intersections)
 - Total \$64,491,301 for 3 km of road = \$21M/km
- TMP recommends using \$7.25M/km for a unit cost for 2 to 4-lane widening. Please provide the detailed project cost sheet to clarify why this road is estimated at ~3x this unit cost.

The gross capital cost for the 5th Line Widening (Derry to Britannia) project is estimated at \$67.38 million as illustrated in the table below. As the design for this project is well underway, costing was not based on the 2025 TMP Update as the Town has a more complete, engineer’s cost estimate based on the detailed design. Similar to Question 7, the construction costs in the 2025 TMP Update did not include soft costs, land acquisition or structures which are estimated to be \$38.6 million of the total costs for the project.

C340047 5th Line Widening (Derry to Britannia)

	Previously Approved Capital Budgets	2025 DC Background Study	Total Capital Cost
Environmental Assessment			-
Land Acquisition	15,778,332		15,778,332
Legal/Appraisal/Other Professional Fees	756,473	631	757,104
Project Management	277,939	62,500	340,439
Design/Contract Administration	1,685,184	1,772,233	3,457,417
Utilities	1,510,205		
Roadworks		28,743,023	28,743,023
Structures		8,192,120	8,192,120
Capital Surcharge	750,824	1,337,707	2,088,531
Contingency	2,046,322	5,813,606	7,859,928
Permit Fees/Other	150,364	6,122	156,486
Total Capital Cost	22,955,643	45,927,942	67,373,380

9. 5th Line Widening (Britannia to Lower Base)

- We note the TMP did not recommend improvements to this road segment, however we also understand the TMP was based on JBPEs and did not consider all the future growth areas included in OPA 92.
- The TMP recommends using \$7.25M/km for a unit cost for 2 to 4-lane widening. This would equate to approximately \$22M for this project, but the DC includes \$29.6M.

Please provide the detailed cost breakdown.

Similar to the response to Question 7, the 2025 Transportation Master Plan (TMP) Update costs per centre line kilometre were for construction costs only and did not include soft costs or structures. As illustrated in the table below, the construction costs for this road segment were based on the \$7.25 million/km costing in the 2025 TMP Update for the 2.5km road segment.

C340049 5th Line Widening (Britannia to Lower Base Line - 4 Lane)

	2025 DC Background Study
Project Management	63,000
Design/Contract Administration	3,402,000
Roadworks	18,125,000
Structures	3,000,000
Capital Surcharge	862,000
Contingency	4,165,000
Total Capital Cost	29,617,000

10. Lower Base Line (Tremaine to JSP)

- These road segments are not identified in the TMP. In the response to BILD comments, the Town noted it is staff's opinion a widening may be required to support the future employment areas and intermodal facility, but this is not yet supported by a TMP study. We question this conclusion as it can be anticipated that much of the traffic for these employment areas would likely utilize Tremaine Road to connect to Highway 401.
- The total gross capital cost of this project is \$142.7M (\$98.6M construction, \$44.1M land) and scheduled for late in the DCBS period (2041-2051). Given this substantial cost and the absence of study to support it, we recommend this project be removed from the DC until such time as supportive studies are completed.

As noted above, the Town's 2025 TMP Update did not include or study the expanded urban boundary that has been included in the 2025 DC Background Study. The response provided to BILD related solely to the Tremaine to Regional Road 25 segment and included reference to both the future employment areas, including the intermodal facility, as well as the residential Community Expansion Area Lands. With the anticipated growth in both employment and population of the expanded urban boundary, staff anticipate an east/west arterial corridor between Tremaine and James Snow Parkway will be needed.

With consideration for the feedback received from stakeholders, the costs for this project will be updated through the Addendum report to reflect updated assumptions for land dedications and cost per acre. The revised gross capital cost of this project is \$122.38M (\$98.6M construction, \$23.8M land). Additionally, a potential for a 10% post period benefit deduction will also be considered for the Tremaine to Regional Road 25 segment through the Addendum report.

11. Land for Roads (Table 5-9)

- Please provide further details on the determination of land requirements for road widenings outlined in Table 5-9. It would appear that many of the roads are within future development areas and it would be expected that the majority of the land requirements would be obtained by the Town through

development applications. Please provide a map identifying which segments of roads were determined to be needed for purchase.

- We note that of the \$178M in land attributed to roads, over 80% (\$146M) is for land in the 2041-2051 period. Making an assumption within the 2025 DCBS that this amount of land in the 2041-2051 period will be required to be purchased, rather than obtained through development applications, is premature. Is this in line with the Town's historical trend for the percentage of land that has been subject to direct purchase?

The following table provides further details on the land assumptions for roads included on Table 5-9 including right of way (ROW) widths and lengths, purchase vs conveyance assumptions, land value per acre, and other costs (including appraisal costs, contingency, and capital surcharge). Note the rows highlighted in yellow reflect revised costing and assumptions that will be presented in the Addendum Report and represent a decrease in land costs of \$34.43 million from the original DC Background Study. Additionally, Table 5-9 of the Addendum Report will present an option for Council consideration to include a post period benefit reduction of \$9.99 million against projects late in the forecast period.

Land - 2051: Services Related to a Highway

Proj. No.	Project Description	Current ROW Width (m)	Planned ROW Width (m)	Additional ROW Width Required (m)	Length (km)	Land Area Required (m2)	Land Area Required (acres)	Purchase Assumption	Land to be Purchased (acres)	Cost per Acre	Total Land Cost	Appraisal Cost	Contingency	Capital Surcharge	Total Cost in DC Study
9	5th Line Widening (Britannia Road to Lower Base Line) (4 lane)	20.00	37.50	17.50	2.50	43,750	10.80	50% This segment of Fifth Line is adjacent to the Britannia Secondary Plan and Britannia East Expansion Area lands. Based on anticipated timing, it is assumed 50% of the land needs will be dedicated under the Planning Act.	5.40	\$ 2,500,000	\$ 13,500,000	\$ 240,000	\$ 1,350,000	\$ 453,000	\$ 15,540,000
10	5th Line (Main Street E to Yukon Court)			-		-	1.75	15% Lands have already been secured through development on the south side. North side requires acquisition and is not expected to be dedicated under the Planning Act.	0.26	\$ 2,500,000	\$ 656,250	\$ 5,500	\$ 65,625	\$ 21,821	\$ 749,000
11	6th Line (Hwy 401 to Derry Road) (4 lane)	20.00	30.00	10.00	0.97	9,713	2.40	50% Assume the widening will occur around a centre line (ie. even on both sides; noting widening/alignment details are still to be determined). Much of the west widening is within the Derry Green Corporate Business Park while eastern portion is largely within the greenbelt. Can anticipate some dedication (likely less than 50% from properties within the Derry Green Business Park) and 100% purchase of non-developing lands on the east side.	1.20	\$ 2,500,000	\$ 3,000,000	\$ 370,000	\$ 300,000	\$ 110,100	\$ 3,780,000
		20.00	30.00	10.00	1.02	10,239	2.50		50%	1.27	\$ 125,000	\$ 158,125	\$ 15,813	\$ 5,218	\$ 180,000
12	6th Line Widening (Derry Road to Britannia Rd) (4 lane)	20.00	30.00	10.00	1.50	15,000	3.70	50% Assume the widening will generally occur around a centre line (ie. even on both sides; noting widening/alignment details are still to be determined). Land needs border Derry Green Business Park and Britannia Secondary Plan to the west and greenbelt and Britannia Secondary Plan to the east. Anticipate 50% overall dedication based on historical conveyance experience in employment and residential development areas.	1.85	\$ 2,500,000	\$ 4,625,000	\$ 345,000	\$ 462,500	\$ 162,975	\$ 5,600,000
		20.00	30.00	10.00	1.50	15,000	3.70		50%	1.85	\$ 125,000	\$ 231,250	\$ 23,125	\$ 7,631	\$ 260,000
13	6th Line Widening (Britannia to Lower Base Line) (4 lane)	20.00	30.00	10.00	1.35	13,500	3.30	75% Given location of widening within the Britannia Secondary Plan, Britannia East Expansion Area, and the Employment Area Expansion lands along with area through greenbelt, assume 50% of the lands are within/adjacent to the development areas and of those, 50% will be conveyed under the Planning Act; remainder will need to be purchased.	2.50	\$ 2,500,000	\$ 6,250,000	\$ 787,500	\$ 625,000	\$ 229,875	\$ 7,890,000
		20.00	30.00	10.00	1.65	16,500	4.10		75%	3.05	\$ 125,000	\$ 381,250	\$ 38,125	\$ 12,581	\$ 430,000

Proj. No.	Project Description	Current ROW Width (m)	Planned ROW Width (m)	Additional ROW Width Required (m)	Length (km)	Land Area Required (m2)	Land Area Required (acres)	Purchase Assumption	Land to be Purchased (acres)	Cost per Acre	Total Land Cost	Appraisal Cost	Contingency	Capital Surcharge	Total Cost in DC Study
14	Louis St. Laurent Extension (5th Line to 6th Line) (4 lane)	-	35.00	35.00	1.40	49,000	12.10	12% Based on assumed alignment (relatively straight), two of three properties appear to be developer owned and within the Britannia Secondary Plan Area. Assume these two properties will be conveyed under the Planning Act with the remaining property to be purchased.	1.50	\$ 2,500,000	\$ 3,750,000	\$ 30,000	\$ 375,000	\$ 124,650	\$ 4,280,000
15	Main Street (Trafalgar to west of Hwy 407) (4 lane)	-	35.00	35.00	2.40	84,000	20.75	50% Assume properties between Trafalgar and Auburn are conveyed and between Auburn and the 407 will need to be purchased.	10.38	\$ 2,500,000	\$ 25,937,500	\$ 210,000	\$ 2,593,750	\$ 862,238	\$ 29,600,000
16	Britannia Road (Tremaine Rd to MEV West Boundary) (4 lane)	20.00	35.00	15.00	0.30	4,500	1.10	75% Assume 50% of the north side will be conveyed; full purchase required for the south side.	0.83	\$ 2,500,000	\$ 2,075,000	\$ 60,000	\$ 207,500	\$ 70,275	\$ 2,400,000
17	Lower Base Line (Fourth Line to Fifth Line) (2 lane extension)	20.00	26.00	6.00	1.70	10,200	2.50	50% Assume 50% conveyance due to timing of road construction and neighbouring development.	1.25	\$ 2,500,000	\$ 3,125,000	\$ 135,000	\$ 312,500	\$ 107,175	\$ 3,680,000
18	Lower Base Line (Fifth Line to Town East Boundary) (4 lanes)	26.00	35.00	9.00	5.30	47,700	11.80	75% Assume 25% conveyance based on experience with land acquisition within the Derry Green Business Park.	8.85	\$ 2,500,000	\$ 22,125,000	\$ -	\$ 2,212,500	\$ 730,125	\$ 25,070,000
19	Intersection Improvement Costs			-		-	1.00	100% No land conveyance assumed as related to existing intersections.	1.00	\$ 2,500,000	\$ 2,500,000	\$ 300,000	\$ 280,000	\$ 92,400	\$ 3,172,000
20	Lower Base Line - Tremaine to RR 25 - widening to 4 lanes	24.00	35.00	11.00	0.74	8,137	2.00	100% No adjacent development therefore, assume no land conveyance.	2.00	\$ 2,500,000	\$ 5,000,000	\$ -	\$ 500,000	\$ 165,000	\$ 5,670,000
		24.00	35.00	11.00	1.96	21,563	5.30		5.30	\$ 125,000	\$ 662,500		\$ 66,250	\$ 21,863	\$ 750,000
21	Lower Base Line - RR 25 to new JSP - widening to 4 lanes	20.00	35.00	15.00	2.02	30,300	7.50	75% Assume 50% of the north side will be conveyed (excluding the Parkway Belt West Boundary lands); full purchase required for the south side and the Parkway Belt West Boundary lands).	5.63	\$ 2,500,000	\$ 14,075,000	\$ 632,500	\$ 1,407,500	\$ 483,450	\$ 16,600,000
		20.00	35.00	15.00	1.48	22,200	5.50		100%	5.50	\$ 125,000		\$ 687,500	\$ 68,750	\$ 22,688
22	Main Street Crossing (Trafalgar to 407)			-		-	5.25	100% No adjacent development therefore, assume no land conveyance.	5.25	\$ 2,500,000	\$ 13,125,000	\$ 60,000	\$ 1,312,500	\$ 434,925	\$ 14,930,000

12. Growth Forecast (Table ES-2)

- The Growth Forecast in Table ES-2 identifies growth within the Trafalgar Secondary Plan as a population of 39,536 and 12,680 units. However, the endorsed Trafalgar Tertiary Plan identifies a planned population of 45,000 within 17,260 units (see Section 4 of the Tertiary Plan). This equates to an understating of the Trafalgar units by 26.5% in the DC. Please clarify.

The growth forecast presented in the 2025 DC Background Study is based on the 2024 Housing and Non-Residential Needs Analysis Report. The forecast was developed based on unit demand projections, rather than the unit supply permitted in the secondary/tertiary plan and results in a lower unit count and adjusted unit mix. The adjusted unit mix results in a population estimate that is 12% lower than the approved tertiary plan and where applicable, the capital costs included in the DC Background Study reflect the demand based growth forecast.

Delta Urban - Milton Phase 4 (West) Landowners Group Inc.

Questions and Comments - DC Study (#2)

(Note - The original question or comment submitted is presented below in **bold font**, while the Town's response is provided in standard (non-bolded) font.)

General Comments:

- 1) **DCs for several services have significantly increased since the 2021 Background Study, without a comparable increase in the projected population.**
 - a. **The Long-term (to build-out) costs for parks and recreation increased from \$475 million in the 2021 background study, to approximately \$1.4 billion in the 2025 study. This represents an increase in cost of about 285% whereas population growth from the 2021 study only amounts to a 39% increase. This disproportionate increase in cost vs. population can be identified throughout the DC Background Study**
 - b. **Please provide additional information identifying the assumptions used in these costs**

The planned facilities in the capital project list are based on current service standards, as previously established by Council through a Community Services Master Plan Update and Parks and Recreation Provision Target report, applied to the anticipated population growth in the 2051 horizon.

For Parks and Outdoor Recreation amenities, the DC Background Study generally aligns with the parkland quantum and classifications identified in the executed Master Parks Agreements for the applicable development areas, as well as the estimated park acquisition quantum for the remaining growth areas based on Planning Act allowances. The cost estimates assume the land is conveyed to the Town at the base park conditions, in accordance with the Town's Engineering and Parks Standards Manual, as outlined in the agreements. Although the Master Parks Agreements permit the construction of the parks by the Owner, the cost for construction in excess of the base park condition and actual construction of all recreation facilities and park amenities within the parks is the sole responsibility of the Town. These capital construction costs have been included in the DC Background Study.

For Indoor Recreation amenities, the cost estimates for the recreation facilities are based on average costs per square foot of construction plus soft costs and land. The base construction costs were determined through a review of various comparable builds in other GTA municipalities (indexed to 2025\$) and consideration for the Altus Group 2025 Canadian Cost Guide. A construction cost of \$830 per square foot was assumed, which is towards the lower end of the range for multi-use recreation centre costing in the Altus guide (ranges from \$670 to \$1,160 per square

foot). Soft costs were applied as a percentage of the base construction cost per square foot as presented in the following table:

Design/ Contract Administration	Contingency	Furniture/ Fixtures/ Equipment	Site Investigations/ Permits/Fees	Project Management	Capital Surcharge
12%	10%	2%	1%	3%	3%

The square footage assumption for the various recreation facilities are as follows:

Community Facility	Facility Size (square feet)
Arena - Twin Pad	77,000
Indoor Pool	30,800
Gymnasium	14,300
Multi-purpose Spaces	6,600

Following a detailed review of the facility sizes, it has been determined the gymnasium assumption of 14,300 square feet should be reduced to 9,000 square feet. This change will result in a decrease in cost for the community centres that will be presented through an addendum to the DC Background Study.

For community centres specifically, costs have increased notably since the time the 2021 DC Background Study was prepared. The average cost per square foot of construction assumed in the 2021 DC Background Study was \$343. This increased to \$830 per square foot in the 2025 DC Background Study which is reflective of recent builds in other GTA municipalities and is below the mid-range of the Altus 2025 Canadian Cost Guide as noted above.

Extended Planning Period

- 2) The DCBS identifies a number of projects as occurring in “2035+”, these include costs associated with spray pads, playground equipment and other facilities. What assumptions were used in the preparation of these costs as these estimates are planned for a horizon beyond 10 years?
 - a. We note that the Town has not yet completed its Parks and Recreation Master Plan which would be a guiding document for determining the parks and recreation projects to be included in the DCBS.
 - b. It is difficult to establish what post benefit to apply to parks and recreation facilities planned for a horizon of “2035+” as it will differ depending on if the project is constructed in 2035 vs. 2051

For Parks and Recreation, the infrastructure that has been identified in the DC Background Study is based on the Town’s existing service levels, which align with the Council-approved service standards established through a Community Services Master Plan Update and report COMS-002-21. These service standards have been applied to the growth in population that is reflected in the Development Charge calculation, and as such a post period benefit is not appropriate as the services provided for relate entirely to eligible growth within the forecast period.

Increased Capital Costs

3) Please provide further details regarding the significant cost increases in capital facilities between the 2021 DCBS and the draft 2025 DBCS

The average cost per square foot of construction assumed in the 2021 DC Background Study was \$343 for recreation facilities. This increased to \$830 per square foot in the 2025 DC Background Study which is reflective of recent builds in other GTA municipalities and is below the mid-range of the Altus 2025 Canadian Cost Guide.

Due to changes in estimated population across the Town and within the various secondary plan areas, the scope of each of the community centres was also re-evaluated through the 2025 DC Background Study process with facilities being grouped together resulting in more comprehensive community centres that will result in improved operational efficiencies. The following table summarizes the overall changes in community centres from the 2021 DC Background Study to the 2025 DC Background Study, exclusive of the new community centre identified for the Community Area Expansion Lands.

Facility Type	2021 DC Study (Excluding Land)		2025 DC Study		Change			
	Qty	\$	Qty	\$	Qty	\$	Capital Cost Inflation	Scope Changes
Arena (Twin Pad)	4.00	106,272,000	4.00	338,800,000	-	232,528,000	232,528,000	
Indoor Pool	4.00	69,308,400	5.00	169,400,000	1.00	100,091,600	66,211,600	33,880,000
Gymnasium	6.00	30,398,300	7.00	110,110,000	1.00	79,711,700	63,981,700	15,730,000
Multi-Purpose Space	4.00	9,912,400	4.00	29,040,000	-	19,127,600	19,127,600	
Total		215,891,100		647,350,000		431,458,900	381,848,900	49,610,000

The overall change in scope to address increases in planned population is the addition of one (1) indoor pool and one (1) gymnasium, which accounts for \$49.61 million of the overall \$431.5 million increase in estimated capital expenditures. The remaining is due to inflationary pressures. Detailed assumptions for capital costs for these facilities is provided in response to question 1 above.

Service Level Caps

- 4) **The value per capita for indoor recreation, park development, park amenities and trails all increased by significant levels between the 2021 DCBS and the draft 2025 DCBS. Given that land values were included in the 2021 DCBS, this increase is even more staggering; please provide further details.**

The service level standard tables have been updated since the 2021 DC Background Study to reflect 2025 replacement construction values, which have increased significantly during this period particularly for indoor recreation facilities. Both the park amenities and trails value per capita have increased less than building construction price index since the 2021 DC Background Study.

Similar to the method that was used for the capital forecast (as described above), a combination of actual construction costs, indexing using the construction price index, and the construction price guide was utilized for the replacement value of infrastructure.

- 5) **We note that over the past 15 years, some facilities have been renovated and upgraded without an increase in facility size. Given the qualitative improvement for these facilities, please confirm if/why the same value per square foot is utilized for the entire 15-year period.**

Maintenance and renovation occurs at all facilities as part of the lifecycle management of the facilities, and in order to ensure the ability to deliver the related service to the public without interruption. 2025 construction replacement values have been applied to each facility in a manner as described above and in accordance with section 4.(1.1) of O. Reg. 82/98: General under the Development Charges Act. If there is a particular facility or amenity to which a material change in the quality of service provided (without an expansion of space) is suspected, please identify and we can respond accordingly.

Studies

- 6) **The *Act* allows for the cost of studies to be included in the charge, but only for studies related to the services that are subject to the charge. It is unclear how studies such as the Corporate Strategic Plan, Special Financial Studies, Commercial Needs Assessment and similar studies related to those services that are subject to a development charge. In many cases, these studies would also provide benefit to existing residents.**
 - a. **Please confirm how these studies are related to services subject to the Charge**
 - b. **Please clarify the service level cap for these studies as required by the *Act***

The studies that are included in Table 5-1 are growth related and provide findings and direction that are necessary for the delivery of the eligible development charge services. The third column in table 5-1 identifies the specific service areas to which each study relates, with several of the studies related pertaining to all eligible services.

Although DC-eligible services make up most of the Town's services, the seventh column of table 5-1 recognizes that a component of a number of these studies would pertain to non-eligible services, and as such a deduction has been made (representing 7% of the gross cost of all studies identified).

Similarly, columns 9 and 10 provide a deduction for the Benefit to existing households for those studies which also pertain to the existing community (representing 7% of the gross cost of all studies identified).

For the three specific studies noted:

- The Corporate Strategic Plan - establishes the framework that guides the Town through the growth in service delivery within the community that is expected within the 2051 planning horizon.
- The Special Financial Studies - is utilized to undertake fiscal impact assessments related to growth of services in the community, as well as costs related to the establishment of financial agreements for the delivery of infrastructure growth with the development community.
- The Commercial Needs Assessment informs future planning for service growth in the community with results considered through the official plan process, secondary plan processes, and planning for future intensification.

With respect to the service level standard for growth studies, growth studies are defined as a class of service related to various D.C. eligible services. Studies do not contribute to the level of service being provided by a municipality in the same way that infrastructure assets do and many of these studies are undertaken to determine future anticipated development and service demands and establish the policy directions that ultimately inform the service needs. Subsection 5(3) of the Development Charges Act sets out that in addition to capital works, capital costs can include the cost of studies undertaken in connection with the capital works, preparation of the development charges study, and interest on money borrowed to pay for capital costs. These additional costs components are not included in the historical service level measurement but are appropriate to be added as a capital cost and included in the calculation of the development charge. Furthermore, the examination of development charges background studies undertaken by other municipalities and Milton's own previous background studies makes it clear that it is common practice for these cost components to not be measured against an historical level of service.

Land Costs

- 7) In the DCBS, the land for services required to be calculated on a 10 year horizon would not be acquired until after the 10 year statutory period. The DCBS only deducts a portion of this land as post period benefit.
- a. If the lands are not acquired or needed until after 10 years, none of the cost of the land should be DC eligible.

The Development Charge Act (DCA) outlines the method of determining the DC rate in section 5. It outlines that the increase in need for service attributable to development must be estimated for each service to which the development charge by-law relates, and that the capital costs necessary to provide the increased services must be estimated but does not require that the capital costs be incurred within the 10 year horizon.

Table 5-3 of the Town's DCBS has identified the land needs associated with library, public works and recreation services that are directly attributable to the growth that has been projected within the 10 year period of the by-law. Where the growth in the related development areas extends beyond a 10 year period, a related post period capacity deduction has been made. As such, and regardless of when the acquisition of the land may occur (whether within the 10 year time period or beyond), only the portion of the capital cost that relates to growth within the 10 year by-law period has been included in the calculated charge. A more refined approach to calculating the post period benefit has been undertaken and adjustments are expected in the Addendum report that will more specifically align the growth in the 10 year period, resulting in an increase in the PPB identified on land in the 10 year horizon class.

- 8) The DCBS does not provide what land values were used to determine the cost of any of the lands nor the specifics on the land requirements
- a. Please provide

Land areas utilized in the DCBS are provided in the following table:

Proj. No.	Project Description	Land Area (acres)	Land Classification	Comments
Land - 10 Year				
Library				
1	Branch - PH4 - Britannia	1.69	Urban Low/ Medium Density Residential	
2	Branch - PH4 - Trafalgar/Agerton	1.65	Urban Low/ Medium Density Residential	
3	Branch - Additional Space Needs - Intensification	0.64	Urban Low/ Medium Density Residential	
4	Branch - MEV & Additional HUSP Growth	0.50	Urban Low/ Medium Density Residential	
5	Branch - Community Area Expansion Area	1.83	Urban Low/ Medium Density Residential	
Recreation Facilities				
6-9	Britannia	11.23	Urban Low/ Medium Density Residential	Land Requirements Per: Twin Pad Arena - 5.3 acres Indoor Pool - 2.12 acres Gymnasium - 0.98 acres Multi-purpose Space - 0.45 acres
10-13	Trafalgar/Agerton	8.49	Urban Low/ Medium Density Residential	
14-17	MEV	9.11	Urban Low/ Medium Density Residential	
18-21	Intensification	9.11	Urban Low/ Medium Density Residential	
22-25	Community Expansion Area	16.98	Urban Low/ Medium Density Residential	

Proj. No.	Project Description	Land Area (acres)	Land Classification	Comments
Land - Blended 10 Year and 2051				
Public Works				
26/1	Civic Operations Centre - Sustainable Halton Lands	3.50	Urban Industrial/ Employment Lands	
27/2	Civic Operations Centre - Expansion Area Lands	3.50	Urban Industrial/ Employment Lands	
Land - 2051				
Fire Stations				
3	Station - Britannia	1.32	Urban Low/ Medium Density Residential	
4	Station - Trafalgar/Agerton	1.32	Urban Low/ Medium Density Residential	
5	Training Facility	1.20	Urban Industrial/ Employment Lands	
6	Apparatus Repair Facility	1.20	Urban Low/ Medium Density Residential	
7	Additional Communications Centre	0.19	Urban Low/ Medium Density Residential	
8	Fire Prevention Office Space	0.12	Urban Low/ Medium Density Residential	
Services Related to a Highway				
9	5th Line Widening (Britannia Road to Lower Base Line) (4 lane)	5.40	Urban Low/ Medium Density Residential	Actual land area required is 10.8 acres. Assumed 50% of land area to be conveyed to the Town under the provisions of the Planning Act.
10	5th Line (Main Street E to Yukon Court)	0.26	Urban Industrial/ Employment Lands	
11	6th Line (Hwy 401 to Derry Road) (4 lane)	1.20	Urban Industrial/ Employment Lands	Actual land area required is 4.93 acres. Assumed 50% of land area to be conveyed to the Town under the provisions of the Planning Act.
		1.27	Greenbelt Designated Land (>15 acres)	
12	6th Line Widening (Derry Road to Britannia Rd) (4 lane)	1.85	Urban Low/ Medium Density Residential	Actual land area required is 7.4 acres. Assumed 50% of land area to be conveyed to the Town under the provisions of the Planning Act.
		1.85	Greenbelt Designated Land (>15 acres)	
13	6th Line Widening (Britannia to Lower Base Line) (4 lane)	2.50	Urban Low/ Medium Density Residential	Actual land area required is 7.4 acres. Assumed 25% of land area to be conveyed to the Town under the provisions of the Planning Act.
		3.05	Greenbelt Designated Land (>15 acres)	
14	Louis St. Laurent Extension (5th Line to 6th Line) (4 lane)	1.50	Urban Industrial/ Employment Lands	Actual land area required is 12.1 acres. Assumed 88% of land area to be conveyed to the Town under the provisions of the Planning Act.
15	Main Street (Trafalgar to west of Hwy 407) (4 lane)	10.38	Urban Industrial/ Employment Lands	Actual land area required is 20.75 acres. Assumed 50% of land area to be conveyed to the Town under the provisions of the Planning Act.
16	Britannia Road (Tremaine Rd to MEV West Boundary) (4 lane)	0.83	Urban Low/ Medium Density Residential	Actual land area required is 1.1 acres. Assumed 25% of land area to be conveyed to the Town under the provisions of the Planning Act.
17	Lower Base Line (Fourth Line to Fifth Line) (2 lane extension)	4.20	Urban Low/ Medium Density Residential	Actual land area required is 8.4 acres. Assumed 50% of land area to be conveyed to the Town under the provisions of the Planning Act.
18	Lower Base Line (Fifth Line to Town East Boundary) (4 lanes)	11.80	Urban Industrial/ Employment Lands	
19	Intersection Improvement Costs	1.00	Urban Low/ Medium Density Residential	
20	Lower Base Line - Tremaine to RR 25 - widening to 4 lanes	2.00	Urban Industrial/ Employment Lands	
		5.30	Greenbelt Designated Land (>15 acres)	
21	Lower Base Line - RR 25 to new JSP - widening to 4 lanes	13.00	Urban Low/ Medium Density Residential	
22	Main Street Crossing (Trafalgar to 407)	5.25	Urban Industrial/ Employment Lands	Represents only the Town's land requirements (exclusive of any land requirements for Mississauga).

The land classifications used for the various projects are identified in the table above. The supporting appraisal report that provides land valuation estimates has been posted separately on the [Town's Let's Talk Milton project page](#). Land values in the DC Background Study are based on the appraisal report plus soft costs including contingency, appraisals, legal, internal project management costs, and capital surcharge.

- 9) The DCBS uses the same cost for recreation facilities identified as “intensification” vs. those on greenfield site. Our assumption is that land on greenfield sites would be less expensive than land in intensification areas that would likely involve higher density development

a. Please confirm the assumption used for these values

The DCBS utilizes the same land and facility valuation assumptions for all amenities and facilities. With respect to the amenities/facilities that are identified in relation to the growth within the intensification areas, although the need for the growth in the services is driven by intensification, the physical location of those amenities may occur outside of the intensification area. As such, no additional costs have been added into these amenities to reflect the higher cost that a higher density location may entail.

10) No level of Service calculation was undertaken for the acquisition of land

a. Please provide this calculation as required by the Act

Subsection 5.3(2) of the Development Charges Act excludes a land acquisition class from the requirements of level of service calculation otherwise required under paragraph 4 of subsection 5(1). As such, no level of service calculation has been included for the acquisition of land.

Questions from Email Submission Received March 4, 2026:

1. Infrastructure which serves Tourism Attractions

Concerns raised regarding the inclusion of the full cost of facilities which are funded by outside sources i.e. the National Cycling Centre. How does the DCBS address outside funding sources.

For the Mattamy National Cycling Centre, the square footage included in the level of service calculation has been reduced relative to the overall size of the building due to the high performance cycling activities that are unique to this location. In accordance with subsection 4.(1.1.) of O.Reg. 82/98: General under the Development Charges Act, the Town's level of service calculations include the replacement cost of the municipal capital works and do not include any adjustment for funding by outside sources.

2. Passive Recreation Level of Service

Concerns raised regarding why passive recreation levels of service is not included in the DCBS. Considering the DCBS is intended to 2051 and the population demographic will change, please confirm how the eventual change in LOS of 1.7ha per 1000 residents is reflected in the DCBS.

The Town's existing passive recreation levels of service are included in the DCBS level of service calculations as they form part of the Town's existing service provisions. Passive recreation spaces are not identified separately but are included within the acreage and associated costing on the parkland development level of service worksheet.

The Town's capital costs for parkland development, park amenities, and outdoor recreation facilities were developed based on actual parkland the Town has already secured or will acquire through future development under the Planning Act land conveyance or cash-in-lieu provisions. The parkland identified for development in the DCBS represents roughly 365ha, which is below the 1.75ha per 1,000 population Parkland Provision Target. The capital costs have estimated facility fits for outdoor recreation facilities and parkland amenities based on the size/type of parkland to be conveyed and the Town's provision standards.

BILD Stakeholder Discussions - 25-Feb-2026 and 9-Mar-2026

Milton Phase 4 (West) Landowners Group Inc. Stakeholder Discussion - 2-March-2026

Questions and Comments - DC Study

(Note - The original question or comment submitted is presented below in **bold font**, while the Town's response is provided in standard (non-bolded) font.)

- 1. Clarity was requested on the use of the Region's PPU's for apartment units rather than Milton specific PPU's and more specifically, would like information on how Milton's PPU's compare against the Region's PPU's for the 1-5 year timeframe.**

The DC Background Study used the Halton Region apartment PPU data, as it is more comprehensive and is consistent with the 2021 development charge background study. In the 2021 dataset, the PPU for Milton in the 1–5 year timeframe is 2.121, while Halton Region has a PPU of 1.840 over the same period. We note that in the 1–5 year timeframe, there is a noticeable increase in the new-unit PPU's in Milton relative to historical trends, while the Region's data is more stable.

Given the evolving sample of new apartment units in Milton, we do not consider the short-term fluctuation in Milton's 1–5 year PPU's to be a sufficient basis for Milton apartment PPU at this time. Halton Region's apartment PPU is derived from a larger, more stable dataset and already reflects a range of built forms and unit mixes across Halton, including the Town. As additional Milton apartment data becomes available in future, the decision of using the Milton apartment PPU will be revisited. Given the evolving nature of data for Milton, the use of the Halton Region apartment PPU has been determined to be appropriate.

- 2. An inventory/mapping of active transportation data and linear parks has been requested.**

The Milton Pipeline Trails (Union Gas Trails) have been identified as active transportation trails in the DC Background Study. After a more detailed review of the Milton Pipeline Trails, staff have identified additional trail lengths that were not included in the Active Transportation service standard table on page B-7 of the DC Background Study. The following table illustrates the actual linear metres of the Milton Pipeline Trail (an increase of 3,687 linear metres over those identified in the Study):

	Linear Metres
Milton Pipeline Trail Union Gas Trail E/W	6,686
Milton Pipeline Trail Union Gas Trail N/S	2,065
Total Union Gas Trails	8,752

The following table provides detail by park of the linear parks included in the Parkland Development service standard table included on page B-18 of the DC Background Study:

	Acres
16 Mile Creek Park	25.07
CN Trail	3.06
Coates Linear Park	4.56
CP Trail	0.37
Derry Road Boulevard Buffer Trail	1.88
Moorelands Park	4.07
Thompson Road Boulevard Buffer Trail	3.68
Timberlea Park (asphalt trail near Childs, from Centennial Forest Park)	0.85
Total Linear Parks	43.55

The above linear parks include active transportation trails that have not been separately identified with the active transportation service standard worksheet. Information is not readily available to split the linear parks between the active transportation and parkland development service standard schedules. Given that neither the services related to a highway nor the parks and recreation services are impacted by service levels caps, no changes will be made to the service standard schedules during this study process. Staff will work to delineate the active transportation trails from the linear parks with intention to include in the next DC Background Study process.

3. Clarification and further details on community centre costing has been requested, including examples of municipal comparators used by the Town to determine costing used in the DC Background Study.

Further details on the community centre costing was provided in the responses to the original BILD submission and the original submission from Delta Urban on behalf of the MP4 Landowners, both publicly available on the [Town's Let's Talk Milton DC/CBC Study Project Page](#). In addition to reviewing the Altus Group 2025 Canadian Cost Guide, the Town benchmarked against the following recent projects (indexed to 2025\$ where applicable):

- Whitby Fieldgate Sports Complex
- Cambridge Recreation Complex
- Don Mills Community Centre

Additionally, a comparison of multi-use/community centre costing included recent development charge background studies was undertaken to validate the reasonability of the \$830/square foot capital construction cost. Some of the

municipalities included in the municipal scan were Burlington, Hamilton, and Richmond Hill.

- 4. Occupancy Payment for High Density Units: Clarity on timing of development charge payment, specifically for high density developments, and Town's interpretation of the legislation as it relates to payment at occupancy. BILD is looking for, at a minimum, payment by blocks of units (or floors) as occupancy for each floor is granted, and ideally, unit by unit payment for high density developments.**

The Town currently collects development charge payments in accordance with subsection 26.1(3.1) of the Development Charges Act which requires payment of development charges in full the day an occupancy permit is issued or the day the building is first occupied. Staff have documented the concerns raised regarding the timing of payment at first occupancy for high density units and will review the legislation, our internal business processes, and system capabilities with consideration for an alternative to payment at first occupancy. This review will be undertaken separately from the DC Background Study.

BILD: Memorandum KR Planning Group

Additional Comments - 6-April-2026

(Note - The original question or comment submitted is presented below in **bold font**, while the Town's response is provided in standard (non-bolded) font.)

- 1. Based on the responses received from the Town for question 31, the capital cost assumptions for new facilities is based on the Altus Group Cost Guide and assumed to be \$830 per square foot (SF), chosen based on "the lower end of the range for multi-use recreation centres costing in the Altus guide (ranges from \$670 to \$1,160 per square foot)". The Town's response to question 37 indicates that the construction cost used in the 2021 DC Study was \$343/SF, which appears to be based on the mid-point of the individual components of the recreation facilities, rather than the application of the costing for the multi-use recreation centre building type from the Cost Guide - the table below attempts to re-create the costing assumptions and methodology used in the 2021 DC Study, using data from the 2021 Altus Group Cost Guide.**

Figure 1

Re-created Cost Estimate for Recreation Facility from 2021 DC Study using 2021 Altus Cost Guide

Facility / Component	Altus Cost Guide Building Type (Public Sector - GTA)	Square Footage	Mid-Point of Low/High	Cost at Midpoint	2021 Altus Cost Guide	
					Low	High
Rink	Ice Arena	77,000	\$ 263	\$ 20,212,500	\$ 225	\$ 300
Pool	Community Aquatic Facility	30,800	\$ 510	\$ 15,708,000	\$ 420	\$ 600
Gym	Multi-Use Recreation Centres	14,300	\$ 430	\$ 6,149,000	\$ 335	\$ 525
Multi	Multi-Use Recreation Centres	6,600	\$ 430	\$ 2,838,000	\$ 335	\$ 525
Total/Average		128,700	\$ 349	44,907,500		

Source: Town of Milton DC Study and Stakeholder Responses, 2021 Altus Cost Guide

The table below shows the effect of the Town's change in costing methodology from the blended average approach to instead being based on the costs for multi-use recreation centres for all elements of the planned facilities. The effect of the change is to apply a significantly higher cost (\$830) to building components such as the ice arenas that have significantly lower costs per SF (\$386).

Figure 2

Impact of Change in Costing Methodology, Town of Milton, Indoor Recreation Costing Assumptions

Facility/Component	Altus Cost Guide Building Type (Public Sector - GTA)	Square Footage	2025 Altus Cost Guide		Assumed Cost	Estimated Cost	50% of Range	Assumed Cost as % of Range
			Low	High				
Town DC Study Whole Facility	Multi-Use Recreation Centres	128,700	\$ 670	\$ 1,160	\$ 830	\$ 106,821,000	\$ 915	33%
Revised Using 2021 Methodology					Assumed Cost at 33% of Range			
Rink	Ice Arena	77,000	\$ 355	\$ 450	\$ 386	\$ 29,748,950	\$ 403	33%
Pool	Community Aquatic Facility	30,800	\$ 610	\$ 940	\$ 719	\$ 22,142,120	\$ 775	33%
Gym	Multi-Use Recreation Centres	14,300	\$ 670	\$ 1,160	\$ 832	\$ 11,893,310	\$ 915	33%
Multi	Multi-Use Recreation Centres	6,600	\$ 670	\$ 1,160	\$ 832	\$ 5,489,220	\$ 915	33%
		128,700			\$ 538	\$ 69,273,600		
			REVISED AVERAGE COST/SF					
			Adjustment Factor	Town DC Study	Revised			
Hard Costs				\$ 830	\$ 538			
Soft Costs								
Design/Contract Administration			12%	\$ 100	\$ 65			
Contingency			10%	\$ 83	\$ 54			
Furniture/Fixtures/Equip			2%	\$ 17	\$ 11			
Site Investigations/Permits/Fees			1%	\$ 8	\$ 5			
Project Management			3%	\$ 25	\$ 16			
Capital Surcharge			3%	\$ 25	\$ 16			
Total Soft Costs				\$ 257	\$ 167			
Total Costs				\$ 1,087	\$ 705			

Source: Town of Milton DC Study and Stakeholder Correspondence, 2025 Altus Group Cost Guide

Once the soft cost adjustments cited in the Town’s response are included, the delta in total cost per square foot continues to diverge due to the percentage-based adjustments. Using the Town’s DC Study costing for hard construction costs, the \$830/SF becomes \$1,087/SF, while using the blended average methodology, the \$538/SF becomes \$705/SF inclusive of soft costs.

The recreation facility costing included in the 2021 DC Background Study was based on the Town’s 2017 Fiscal Impact Analysis (FIA), indexed to 2021\$, without direct consideration for the 2021 Altus Canadian Cost Guide. Construction of community centres has evolved over time and there are very limited examples of standalone facility builds for arenas, gymnasiums, and pools that could be used for costing each individual component. As such, and as noted in response #3 of the BILD Stakeholder Discussion (25-Feb-2026 and 9-Mar-2026) and Milton Phase 4 (West) Landowners Group Inc. Stakeholder Discussion (2-Mar-2026), available on the Town’s Let’s Talk Milton project page, the Town benchmarked the total community centre costing that has been utilized in the DC Study against the following recent projects (indexed to 2025\$ where applicable):

- Whitby Fieldgate Sports Complex
- Cambridge Recreation Complex
- Don Mills Community Centre

Additionally, a comparison of multi-use/community centre costing included in recent development charge background studies was undertaken to validate the

reasonability of the \$830/square foot capital construction cost. Some of the municipalities included in the municipal scan were Burlington, Hamilton, and Richmond Hill. The 2025 Canadian Cost Guide prepared by Altus Group was used as an additional resource to validate the assumptions derived from the analysis of recent municipal builds.

2. **The Transit BTE of 18.5% is meant to reflect the existing community's share of benefit from an existing transit system where "less than half of the number of service hours per capita compared to municipalities of similar population size, geography and travel patterns.", and the existing transit mode share is a blended average of 0.94%, in moving to a system that would increase service levels by 2.5-times from 0.4 service hours per capita to 1.0 service hours per capita. The estimated BTE is based on an assumption that boardings will increase by 18% "assuming no service improvements in place".**

Q2a) What is the basis for the "Boarding Adjustment Factor" of 18%?

The Town will be issuing Addendum Report #3 that will reflect updates to the calculations presented in Appendix G of the original DC Background Study released December 19, 2025. In this Addendum, the Boarding Adjustment Factor referenced in the question will increase from 18% to 82%. This is the result of a correction to the 2025 Actual Boardings from 1,401,701 to 1,073,351 and an increase in the estimated Boardings per Service Hour in 2035 to 17.54 from the original 14.91.

Q2b) Would a more appropriate measure of BTE be based on the extent to which ridership from the existing community will change based on the planned service improvements incorporated into the capital forecast used to establish the Town's DC rates?

The revised BTE calculation presented through Addendum Report #3 includes increased ridership from the existing community as a result of the planned service improvements.

The formula presented on pages 40-41 of the Dillon Report show that "Boardings by Existing Population in 2025" is 1,401,701. This is a reference to Table 25, which applies the Boardings per Capita of 9.49 to the 2025 population (147,680 persons) to estimate the annual boardings from the existing community of 1,401,701. However on Table 24 this 1,401,701 amount is shown as the "Adjusted Annual Boardings (2035)".

Q2c) can the Town confirm whether there is a discrepancy in the stated timing of the boarding count of 1,401,701 where it appears to be 2025 in some tables and 2035 in others?

The Town’s original projected boardings for 2025 were 1,418,350 (before an adjustment for commingled ridership); however, a downward adjustment to 1,090,000 was made to reflect updated information. This adjusted figure was reflected in Table 7 but was not carried through the balance of the calculations. Addendum Report #3 corrects the 2025 ridership figures throughout the analysis.

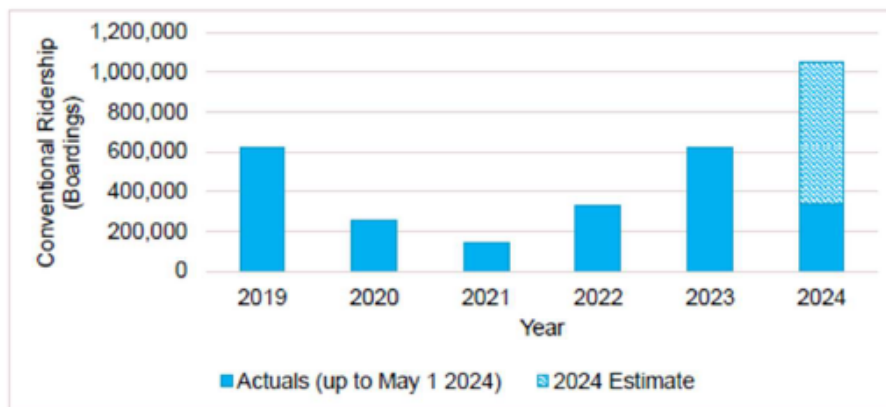
The Adjusted Annual Boardings (2035) column of Table 24 is meant to illustrate the ridership of the 2025 population in 2035 with no service enhancements. As a result, the table reflects no change for the existing population in annual boardings between 2025 to 2035 in this table; noting Addendum Report #3 is corrected for the error in the 2025 annual boardings figure as noted above. Ridership growth by existing residents as a result of service enhancements is reflected in Table 25, also revised through Addendum Report #3.

The estimate of 1.4 million boardings is significantly higher than the roughly 1,050,000 conventional transit boardings estimated for 2024, and roughly 2.5-times higher than the 600,000 boardings recorded for 2023, or any year with ‘actuals’ data over the 2019-2023 period.

Q2d) Why do the actual boardings data in the Arcadis report differ from the estimated boardings used as the basis for the Dillon report?

Figure 3 – Excerpt from Arcadis Five-Year Service Plan and Transit Master Plan Update (June 10, 2024)

Exhibit 3.7: Milton Transit Conventional Ridership (Boardings) From 2019-2024



Source: Milton Transit Ridership Data, 2019-2024 (Note: Ridership data includes only fixed routes and does not include OnDemand or access+ trips)

The Town’s original projection for 2025 was an increase in transit ridership to 1,418,350. As noted in response to Q2a, this figure was revised downward to 1,090,000 in Table 7 to reflect updated ridership information; however, the updated figure was not carried forward through the balance

of the calculations. Addendum Report #3 corrects the 2025 annual boardings throughout the calculations.

Q2e): Why wasn't the Dillon Report based on the data released by the Town for 2024 boardings?

The 2024 boardings of 1,211,510 reflect the actual transit ridership reported by the Town through report [CORS-005-25](#).

- 3. The proportion of land assumed to be conveyed to the Town is at risk of being significantly understated in several cases thereby overstating the DC rate necessary to fund future land acquisition costs.**

Q3a): Does the Town have data supporting regarding how other recently developed areas were split between land acquired versus received via Planning Act conveyances?

As part of the 2026 DC Update process, the Town has reviewed each individual project's land requirements and made detailed assumptions regarding land purchase vs dedication under the Planning Act requirements for each project. The details of these land needs and assumptions were previously provided through responses to question 11 to the original BILD submission as well as question 11 to the 4-Mar-2026 submission from David Schaeffer Engineering Ltd. - Milton P4 Trafalgar Landowners Group; both of which are available on the Town's Let's Talk Milton project page. These assumptions were based on a review of the location of the land (internal/external to a secondary plan/urban boundary area, Greenbelt lands, etc.), type of adjacent development (ie. Residential/non-residential, non-developable), etc, and with consideration of the Town's recent experience with the reconstruction and widening of Fifth Line, where land acquisition is still on-going.

The Town cannot solely use historical land dedication as a basis for estimating future land acquisition costs as a result of:

- Changes in legislation;
- The existence of executed financial agreements in certain secondary planning areas versus other areas where no such agreements exist (example - employment lands, future secondary plans where no such agreements currently exist, etc.);
- Differences in the location of historical versus future roadworks relative to the various secondary plan area types.

Q3b): For lands where acquisition costs are assumed (in full or in part), will the Town provide DC credits where landowners end up conveying land through Planning Act requirements?

The Town has reviewed each project's land acquisition requirements and made assumptions to reduce the DC capital costs for the land area that can reasonably be expected to be dedicated under the Planning Act requirements. The Town may consider DC credits where land is dedicated beyond the Planning Act requirements.

- 4. The lack of BTE for land acquisition elements of road construction project costs should, in my opinion match the BTE applied to the non-land costs of the road construction. The elements for which BTE is being applied, such as streetlighting, sidewalks/paths, and stormwater management all utilize land in the same way that the increased road lanes being added do, or are part of the solution to add transportation capacity - for example, multi-use paths add transportation capacity, and stormwater management (particularly ponds, swales, etc.) utilize land, and ensure built road capacity can avoid flooding.**

The Town's existing ROW widths are generally sufficient to provide the infrastructure improvements such as streetlighting, sidewalks/bike paths, and stormwater management facilities associated with urbanization of existing rural cross sections. The land acquisition needs relate directly to the widening of the roads and increased capacity of the road as necessitated by growth in the Town. As such, no benefit to existing has been applied to the land capital costs for road widenings.

- 5. The Town's response to question 29 from my memorandum states that the "planned facilities in the capital project list are based on current service standards applied to the population growth in the 2051 horizon."**

The continuation of the Town's service level ignores that the Town has a relatively high existing service standard compared to other municipalities in the GTA - in making the judgement that the DC rates need to recover the existing service levels, has the Town considered how high its service levels are relative to other communities?

Figure 4

Municipality	Square Feet of Indoor Recreation Facilities per Capita (Community Centres, Arenas, Pools)
Milton	5.04 SF/capita
Toronto	1.73 SF/capita
Hamilton	4.33 SF/capita
Brampton	2.46 SF/capita
Brant County	7.01 SF/capita
Markham	2.01 SF/capita

Without a master plan undertaken and therefore no technical evidence that supports the continuation of service levels, the establishment of the need to continue existing service levels through maximization of calculated service level caps is unjustified.

Following this logic, a similar argument could be made for any service, and would obviate the need for studies such as Transportation Master Plans, Library Master Plans, etc., that establish the need for service by future growth based on an evaluation of emerging trends, whether existing service levels result in excess capacity relative to typical service standards, or certain demographic or technological shifts are changing the need for certain types of services.

Currently, the Roads DC recovers \$624.9 million in DC recoverable costs, while the service standard is \$2.325 billion. If the same logic was applied to the Town's Road DC such that the full service standard utilized for roads was used by staff as the basis for setting future capital forecasts solely on the basis that the existing service standards should be replicated, the Roads DC would be approximately 4-times higher than it is proposed to be. The approach taken to establish the capital project list in the Parks & Recreation DC is inappropriate and should instead be based on, as per the DC Act, Council's intent as expressed through approved master plans, budgets or other similar expressions, rather than staff's opinion about future service needs.

The reference to the Town's "current service standards" included in response question 29 of the original submission was in reference to the service standards approved through the Town's 2015 Community Services Master Plan Update approved by Council through report CORS-018-15. As mentioned during

discussions, the Town is currently undertaking an update to the Community Services Master Plan; however, the results of this study are not yet available and recommendations in the original DC Background Study released in December 2025 utilized the standards currently approved by Council.

Since the release of the 2025 DC Background Study in December 2025, the Town has identified potential service level reductions for Council consideration to lower the indoor recreation facility service standards through the buildout timeframe of 2051. As illustrated in the following table, the projected service level in both the original DC Background Study report and the subsequent Addendum #1 is decreasing from the Town’s average historical service level.

	Average Historic (2010-2024)	At 2051 Buildout	
		Per December Background Study	Revised per Addendum #1
Square Feet per Capita	5.04	4.17	3.40

Should Council adopt the service level changes identified in the 1st Addendum report, the projected service level will decrease to 3.40 square feet of indoor recreation space per capita, which would position Milton’s service level at the mid-point of the municipalities highlighted in the question above.

6. Further to the information provided on land values applied to the estimated land areas necessary for acquisition, we are continuing to review the reasonableness of the land area assumptions, land value assumptions, and assumed split of land acquisition via DCs and conveyance of land through other means.

Comment has been noted.