



January 30, 2026

Melanie Wallhouse  
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Sent via email to [melanie.wallhouse@milton.ca](mailto:melanie.wallhouse@milton.ca)

RE: 2026 Development Charges and Community Benefits Strategy Review  
Town of Milton

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The Building Industry and Land Development Association (BILD) is submitting this correspondence in response to the Town of Milton's 2026 Development Charge By-law and Background Study, as well as the accompanying Community Benefits Charges Strategy/By-law, ahead of the February 9th public meeting. On behalf of our Halton Forum, we appreciate the opportunity to provide the following comments.

To begin, we would like to thank Town staff for hosting the stakeholder engagement session held on January 27. The walkthrough of the DC review and the opportunity for open discussion with industry stakeholders was greatly appreciated.

As is standard practice in similar reviews across the Greater Toronto Area, BILD has retained Daryl Keleher of KR Planning Group to conduct a detailed review of the Development Charge Background Study on behalf of our membership. Enclosed, you will find a memorandum prepared by our consultant for the Town's review. Please note, that in advance of the February 9<sup>th</sup> public meeting, BILD will also share this memorandum with Council in order to be made part of the public record.

It is important to note that BILD and our members recognize the foundation for development charges and the role they play in funding the Town's future growth. Though, BILD must emphasize the current realities of the housing market and the additional challenges that the proposed increases in development charges would create, placing further strain on the delivery of new housing in Milton.

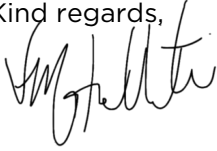
Altus Group's most recent data for new home sales in December 2025 highlights the current challenges in the housing market, with sales in the Greater Toronto Area (GTA) remaining at historically low levels. December 2025 saw just 240 new home sales across the GTA, marking an 82% decline from the 10-year average and a 24% decrease compared to December 2024. These results contributed to a total of 5,314 new home sales for the full year, the lowest annual figure ever recorded since BILD began tracking in 1981.

Breaking this down by housing type, condominium apartments accounted for 87 sales, down 42% from December 2024 and 91% below the 10-year average. While single-family homes recorded 153 sales, down 8% year-over-year and 59% below the 10-year average. Total remaining inventory across the GTA decreased slightly to 20,849 units.

Benchmark prices remain elevated, with new condos averaging \$1,021,235 and new single-family homes averaging \$1,409,725. While the latter reflects a 9% decrease over the past 12 months, prices remain at levels that continue to challenge affordability for many buyers.

We hope that, as this review progresses, the Town will continue to work collaboratively with the development industry to explore all opportunities that support the delivery of new housing. We appreciate the opportunity to contribute to this important process and to remain actively engaged. We look forward to receiving a written response and continuing our constructive collaboration.

Kind regards,

A handwritten signature in black ink, appearing to read "Victoria Mortelliti".

Victoria Mortelliti, MCIP, RPP  
Director, Policy & Advocacy

CC: BILD Halton Forum Members

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*The Building Industry and Land Development Association is an advocacy and educational group representing the building, land development and professional renovation industry in the Greater Toronto Area. BILD is the largest home builders' association in Canada, and is affiliated with the Ontario Home Builders' Association and the Canadian Home Builders' Association. It's 1,200 member companies consists not only of direct industry participants but also of supporting companies such as financial and professional service organizations, trade contractors, as well as manufacturers and suppliers of home-related products.*



## MEMORANDUM

27 January 2026

**To:** Victoria Mortelliti  
BILD

**From:** Daryl Keleher, Principal  
KR Planning Group

**Re:** Milton DC Review  
**Our File:** P1298

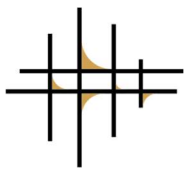
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KR Planning Group was retained by BILD to review the materials released by the Town of Milton in support of its proposed development charges (DC) and community benefits charge (CBC) by-laws, including the associated background studies. This memorandum presents questions and comments from my initial review of the publicly available DC/CBC studies.

## Questions and Comments – DC Study

### 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?
  - 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?
  - c) How have on-campus students been factored into the DC study calculations?
- 2) 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?
- 3) 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?



- 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?

### 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?

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

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

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

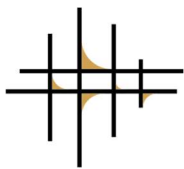
- 6) Schedule 7B is used to establish PPU assumptions for apartment units, using Halton Region data from the 2021 Census. Has the Town's consultant obtained data similar to Schedule 7A that is for the Town only?

### Studies

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

### 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?
- 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?
- 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).

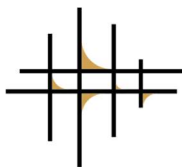
The calculation of BTE for Access+ vehicles is based on estimating the number of existing residents that will age-into the need for the service, and are estimated to be 11.5% of the growth in registrants.

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.

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



- 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.

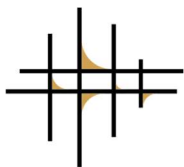
Figure 1

| Differences in BTE for Road Segment and Land Acquisition Costs, 2025 Milton DC Study |   |                |            |       |                |              |            |               |
|--|---|----------------|------------|-------|----------------|--------------|------------|---------------|
| Project #  | Road Segment  | Land           |            |       | Roads Project  |              | Roads      | Updated Land  |
|  |   | Cost           | BTE        | BTE % | Cost           | BTE          | BTE%       | BTE to Match  |
| 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

## 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?
- 17) What is the basis for 0% PPB allocation for projects such as 5<sup>th</sup> Line Widening from Britannia to Lower Base Line scheduled for 2045-2050?
- 18) What is the nature of the “Lower Base Line – 4<sup>th</sup> Line to 5<sup>th</sup> 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 4<sup>th</sup> to 5<sup>th</sup> Line captured in project 17?
- 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?
- 20) For project 26 – Lower Base Line from RR25 to new JSP,
- 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?
  - How was this share calculated or determined?
  - Does the Oakville share include their respective share of BTE?
- 21) Regarding the two bridge projects for the Derry Green Union Gas Pipeline easement:
- Where would the two bridge projects located?
  - Does the Town have any plans to connect the sections of gas pipeline trail that terminate on either side of Highway 25?
  - What is the rationale for including the trail in the Roads DC as opposed to the Parks & Recreation DC?
- 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

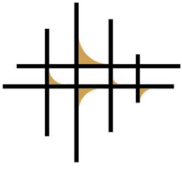


\$3,401,000. What is included in the DC Study that is over and above what is recommended in the TMP Update?

- 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:
- Main Street (Trafalgar to West of 407) – DC study projects 16 (road construction) and project 29 (bridge)
  - Lower Base Line (Tremaine to RR25 – project 25 and RR25 to New JSP – project 26)
  - 5th Line Widening (Britannia to Lower Base Line) – project 5
  - Britannia Road (Tremaine to MEV West Boundary) – project 20
- 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)?
- 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?
- 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?
- 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?
- 28) What costs are included in the various operations centre projects, and what does the “1/3<sup>rd</sup> 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

## **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?
- 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?
- 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.



- 32) What lands are meant to be captured by the projects for lands “External to Secondary Plans”?
- 33) What is the nature of the \$7.34 million line item for “Event Space”?
- 34) What is the basis for including 50% of school lands and other school facilities in the Parks & Recreation LOS inventory?
  - a) What Town costs have been incurred such that they would reflect Town replacement costs of \$120,000 per acre?
  - 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?
  - 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?
- 35) Is the inclusion of the “Maplehurst Diamond” double-counted with the separate inclusion of the “Hardball/Baseball – (lit) (Maplehurst)” line item?
- 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?
- 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?

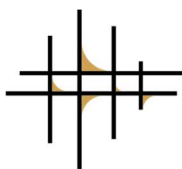


Figure 2

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

|                                 | 2021 DC Study | 2025 DC Study  | % Change |
|---------------------------------|---------------|----------------|----------|
| <b>Boyne CC</b>                 | \$ 58,490,000 | \$ 141,570,000 | 142%     |
| <b>Britannia</b>                |               |                |          |
| 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            | \$ 2,728,000  | \$ 7,260,000   | 166%     |
| Total                           | \$ 76,662,000 | \$ 191,180,000 | 149%     |
| <b>Trafalgar/Agerton</b>        |               |                |          |
| 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            | \$ 2,728,000  | \$ 7,260,000   | 166%     |
| Total                           | \$ 56,312,000 | \$ 141,570,000 | 151%     |
| <b>MEV</b>                      |               |                |          |
| Arena                           | \$ 14,742,000 | \$ 84,700,000  | 475%     |
| Indoor Pool                     | \$ -          | \$ 33,880,000  | n.a.     |
| Gymnasium                       | \$ -          | \$ 31,460,000  | n.a.     |
| Multi-Purpose Spaces            | \$ -          | \$ 7,260,000   | n.a.     |
| Total                           | \$ 14,742,000 | \$ 157,300,000 | 967%     |
| <b>Intensification/Pre-HUSP</b> |               |                |          |
| 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            | \$ 5,456,000  | \$ 7,260,000   | 33%      |
| Total                           | \$ 68,401,000 | \$ 157,300,000 | 130%     |

Source: Town of Milton 2021 and 2025 DC background studies

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?

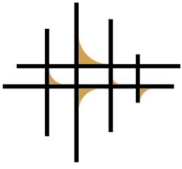
#### Library

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?

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?

### 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?



- 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?
- 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?
- 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.

February 6<sup>th</sup>, 2026  
*Sent Via Email*

Mayor Krantz and Members of Council  
Town of Milton  
150 Mary Street  
Milton, ON L9T 6Z5

Dear Mayor Krantz and Members of Council:

**RE: Town of Milton Draft 2025 Development Charges Background Study – February 9, 2026  
Council Meeting  
Report No. ES-005-26  
Milton Phase 4 (West) Landowners Group Inc. - Comments**

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We are writing to you as the Group Manager for the Milton Phase 4 (West) Landowners Group Inc. (the “Group”). The Group is comprised of registered landowners within the Britannia Secondary Plan in the Town of Milton, as illustrated in the attached mapping (**Schedule A**) and in the enclosed Registered Landowners Summary Table (**Schedule B**).

This letter contains the Group’s preliminary comments on the Town of Milton’s draft 2025 Development Charges (DC) Background Study, prepared by Watson & Associates, dated December 2025. The Town held two Engagement Sessions for the DC Background Study on December 1, 2025, and January 27, 2026, wherein the methodology and key aspects of the DC Background Study were presented and an opportunity for dialogue amongst attendees was provided. As part of the next steps, the Town of Milton has scheduled a Statutory Public Meeting for the DC Background Study on February 9<sup>th</sup>, 2026, and requested public feedback on the DC Background Study and Draft DC By-laws by March 6<sup>th</sup>, 2026. The below are the Group’s comments:

### General Comments

**Comment 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.

### Services Related to a Highway Comments

**Comment 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 4<sup>th</sup> Line.

**Comment 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.

**Comment 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 5<sup>th</sup> Line to 6<sup>th</sup> Line and the EA for the LSL extension from 5<sup>th</sup> 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.

**Comment 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 Reginal Road, additional capacity requirements for the Britannia Secondary Plan area will be assessed and confirmed as part of the supporting Road Needs Analysis.

## Transit Services

### **Comment 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.

## Parks and Recreation Services

### **Comment 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.

### **Comment 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.

On behalf of the Group, we are grateful for your time and review of the above preliminary comments. We will continue to work with the Town and its consultants to provide more detailed comments regarding the DC Background Study and request that Milton Council defer approval of the proposed DC Background Study and implementing By-law until such time as the Milton Phase 4 Landowners Group has had the opportunity to meet and discuss its comments with Town staff and more meaningful engagement with the public has occurred. Should you have any further questions, please do not hesitate to contact the undersigned.

Yours Very Truly,



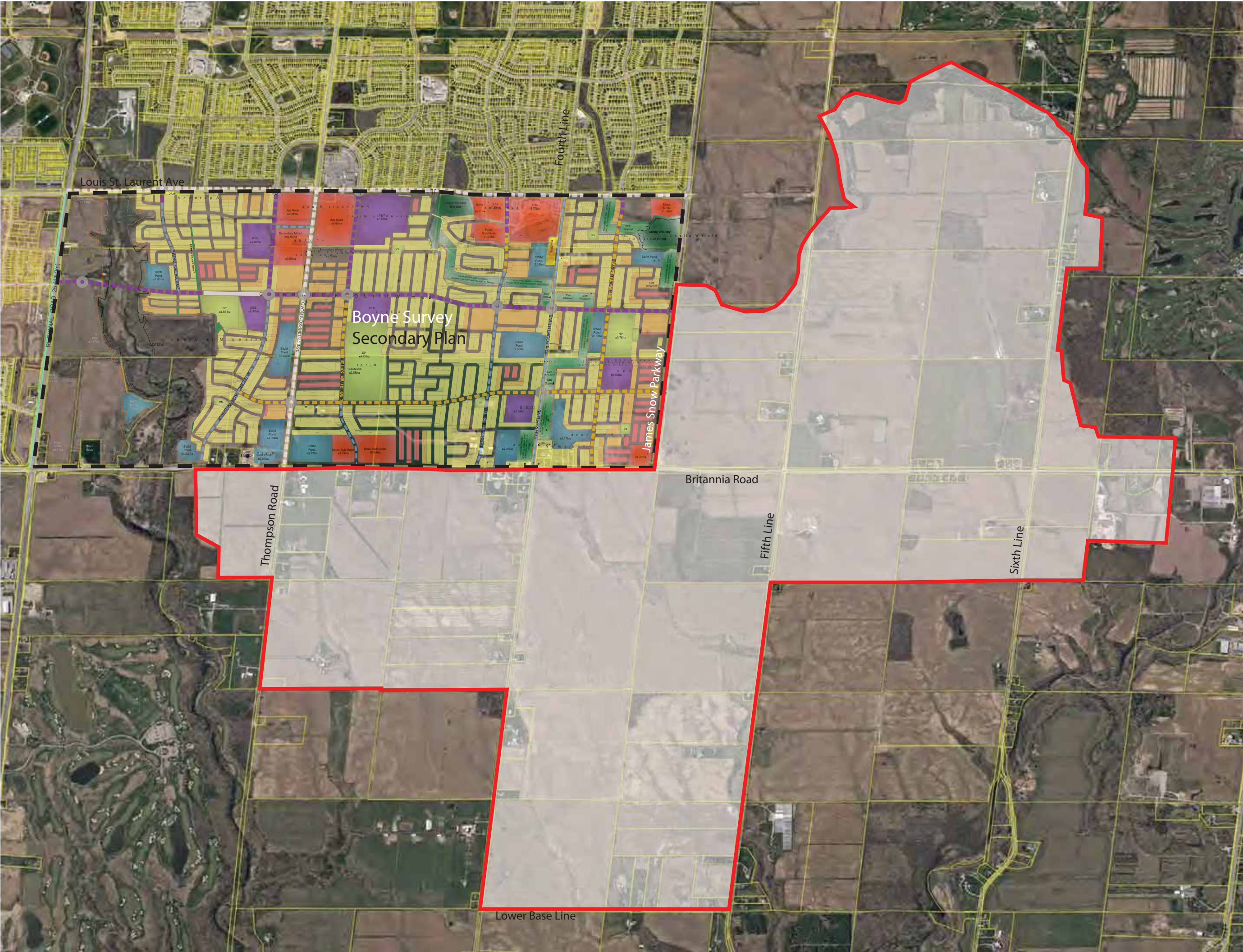
Ore Alade, B.E.S., Project Manager  
Delta Urban Inc.

*Attachments:      Schedule A – Milton Phase 4 (West) Landowners Group Inc. Ownership Map  
Schedule B – Milton Phase 4 (West) Landowners Group Inc. Registered  
Landowners Summary Table  
Schedule C – Pages 5-8, 5-13, 5-23, and 5-28 from the Town of Milton's Draft  
2025 Development Charges Background Study  
Schedule D – Page D-28 from Halton Region's 2022 Development Charges  
Background Study*

*CC:      Jill Hogan, Director, Planning Policy and Urban Design, Town of Milton  
Melanie Wallhouse, Manager, Development Finance and Financial Consulting  
Milton Phase 4 (West) Landowners Group Inc.*

**Schedule A**  
Milton Phase 4 (West) Landowners Group Inc Ownership Map

# MP4 West Landowners Map

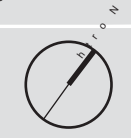


- Legend**
- Secondary Plan Boundary
  - Boyne Survey Boundary

Note:  
 Orianna Glen Homes Corp Britannia By-Pass Lands is owned by Trinison but under contract to Mattamy Homes.  
 Parcel data based on Savanta Ownership Map, last updated April 2019 & information provided by DeltaUrban January 6, 2023

DATE: November 22, 2023

SCALE: Not to Scale



Data Source: First Base Solutions Aerial Flown 2017

**Schedule B**  
Milton Phase 4 (West) Landowners Group Inc. Registered Landowners Summary Table

| <b>MP4 (West) Landowners Group Inc. - Legal Entities</b>  |  |
|---|--|
| <b>Entities</b>   | <b>Common Name</b>   |
| Argo Developments (5th Line) Ltd.   | Argo Development Corp.   |
| Mil Con Four Britannia Developments Limited<br>Mil Con Four Thompson Developments Limited   | Fieldgate Developments<br>Fieldgate Developments   |
| Milton Britannia Development Corp.<br>Milton Fifth Line Development Corp.<br>Fifth Line (5368) Milton Development Corp.   | State Building Corp<br>State Building Corp<br>State Building Corp  |
| Laurier Brown Milton East Developments Inc.<br>Cedar Brown South Milton Inc.  | Cedar City Developments<br>Cedar City Developments   |
| Mattamy (Milton West) Limited<br>Britannia Farms Inc.<br>Fifth Line Farming Limited<br>Mattamy (Milton East) Limited  | Mattamy Homes<br>Mattamy Homes<br>Mattamy Homes<br>Mattamy Homes   |
| Venturon Development (Milton) Inc.<br>Venturon Development (Milton 46) Inc.<br>Venturon Development (Milton 90) Inc.<br>12300 Brit Holdings Ltd.                                    | National Homes<br>National Homes<br>National Homes<br>National Homes   |
| Neamsby Investments Inc.<br>Cedarland Construction Inc.   | The Remington Group<br>The Remington Group   |
| Albanella Development Ltd.<br>Orianna Glen Homes Corp.<br>Sempronia Estates Inc.<br>Trebiano Trail Developments Ltd.<br>Neutrino Developments Inc.<br>Casape Developments (BT) Inc. | Trinison Management Corp.<br>Trinison Management Corp.<br>Trinison Management Corp.<br>Trinison Management Corp.<br>Trinison Management Corp.<br>Trinison Management Corp. |
| Milton Ex--EE Land Limited  | Tom Tsampiris  |
| Britannia Sixth Line Holdings Limited   | Medallion Corporation  |
| Branthaven Fifth Line Inc.<br>Branthaven Sixth Line Inc.  | Branthaven Development<br>Branthaven Development   |
| NDB Milton Developments Inc.<br>NDB Fourth Line Developments Inc.   | Stanford Homes<br>Stanford Homes   |
| Martino (Milton) Limited  | D'Orazio Group of Companies  |
| Tahlequa Holdings Inc.<br>Codroy Developments Inc.  | Townwood Homes<br>Townwood Homes   |
|   |  |

**Schedule C**  
Pages 5-8, 5-13, 5-23, and 5-28 and 5-33 from the  
Town of Milton's Draft 2025 Development Charges Background Study



Table 5-2  
Infrastructure Cost Included in the Development Charges Calculation  
Transit Services

| Proj. No. | Increased Service Needs Attributable to Anticipated Development | Timing (year) | Gross Capital Cost Estimate (2025\$) | Post Period Benefit | Other Deductions | Net Capital Cost   | Less:                           |   | Potential D.C. Recoverable Cost |                   |                       |
|-----------|---|---------------|--------------------------------------|---------------------|------------------|--------------------|---------------------------------|---|---------------------------------|-------------------|-----------------------|
|           |   |               |                                      |                     |                  |                    | Benefit to Existing Development | Grants, Subsidies and Other Contributions Attributable to New Development | Total                           | Residential Share | Non-Residential Share |
|           | 2025 to 2034  |               |                                      |                     |                  |                    |                                 |   |                                 | 79%               | 21%                   |
|           | <b>Vehicles &amp; Equipment:</b>                                |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
| 1         | Fixed Route Buses (Diesel) (42)                                 | 2025-2034     | 45,822,000                           | 15,519,910          |                  | 30,302,090         | 8,481,700                       |   | 21,820,390                      | 17,238,108        | 4,582,282             |
| 2         | Fixed Route Buses (Electric) (13)                               | 2025-2034     | 26,390,000                           | 8,938,290           |                  | 17,451,710         | 4,884,800                       |   | 12,566,910                      | 9,927,859         | 2,639,051             |
| 3         | Commingled Transit Vehicles (6 metre minibuses; gasoline) (5)   | 2025-2034     | 1,305,000                            | -                   |                  | 1,305,000          | 149,800                         |   | 1,155,200                       | 912,608           | 242,592               |
| 4         | Commingled Transit Vehicles (6 metre minibuses; electric) (4)   | 2025-2034     | 1,628,000                            | -                   |                  | 1,628,000          | 186,900                         |   | 1,441,100                       | 1,138,469         | 302,631               |
| 5         | Maintenance Vehicle (1)   | 2025-2034     | 107,000                              | 31,150              |                  | 75,850             | 18,750                          |   | 57,100                          | 45,109            | 11,991                |
| 6         | Supervisor Vehicle (3)  | 2025-2034     | 264,000                              | 76,850              |                  | 187,150            | 46,250                          |   | 140,900                         | 111,311           | 29,589                |
|           | <b>Terminals &amp; Bus Stops:</b>                               |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
| 7         | MEV Terminal  | 2025-2034     | 2,525,000                            | 1,262,500           |                  | 1,262,500          | -                               |   | 1,262,500                       | 997,375           | 265,125               |
| 8         | Kennedy Circle Terminal   | 2025-2034     | 515,000                              | -                   |                  | 515,000            | -                               |   | 515,000                         | 406,850           | 108,150               |
| 9         | Britannia Terminal  | 2025-2034     | 2,525,000                            | 987,280             |                  | 1,537,720          | 1,300                           |   | 1,536,420                       | 1,213,772         | 322,648               |
| 10        | Bus Stops   | 2025-2034     | 164,000                              | 55,550              |                  | 108,450            | 30,360                          |   | 78,090                          | 61,691            | 16,399                |
|           | <b>Facilities:</b>  |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
| 11        | Maintenance and Operations Facility*                            | 2025-2034     | 85,990,000                           | 27,637,190          |                  | 58,352,810         | 10,439,190                      |   | 47,913,620                      | 37,851,760        | 10,061,860            |
| 12        | Reserve Fund Adjustment   |               | 20,715,916                           |                     |                  | 20,715,916         |                                 |   | 20,715,916                      | 14,460,169        | 6,255,748             |
|           |   |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
|           |   |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
|           |   |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
|           | <b>Total</b>  |               | <b>187,950,916</b>                   | <b>54,508,720</b>   | <b>-</b>         | <b>133,442,196</b> | <b>24,239,050</b>               | <b>-</b>  | <b>109,203,146</b>              | <b>84,365,080</b> | <b>24,838,066</b>     |

\*Gross Cost is net of grant funding and of amount included in Town's work in progress. This amount is reflected in the reserve fund adjustment.



Table 5-4  
Infrastructure Cost Included in the Development Charges Calculation  
Services Related to a Highway - Roads

| Proj. No. | Increased Service Needs Attributable to Anticipated Development<br><br>2025 to Buildout      | Timing (year) | Gross Capital Cost Estimate (2025\$) | Post Period Benefit | Other Deductions | Net Capital Cost | Less:                           |   | Potential D.C. Recoverable Cost |                              |                                  |
|-----------|--|---------------|--------------------------------------|---------------------|------------------|------------------|---------------------------------|---|---------------------------------|------------------------------|----------------------------------|
|           |  |               |                                      |                     |                  |                  | Benefit to Existing Development | Grants, Subsidies and Other Contributions Attributable to New Development | Total                           | Residential Share<br><br>77% | Non-Residential Share<br><br>23% |
| 1         | Gateway Features   | 2036-2051     | 394,050                              | -                   |                  | 394,050          | -                               |   | 394,050                         | 303,419                      | 90,632                           |
| 2         | Main Street Extension (Fifth Line to Sixth Line) (4 lane)                                    | 2027          | 24,180,000                           | -                   |                  | 24,180,000       | -                               |   | 24,180,000                      | 18,618,600                   | 5,561,400                        |
| 3         | Main Street Extension (6th Line to Trafalgar) (4 lane)                                       | 2036-2051     | 25,910,000                           | -                   |                  | 25,910,000       | -                               |   | 25,910,000                      | 19,950,700                   | 5,959,300                        |
| 4         | 5th Line Widening (Derry Road to Britannia) (4 lane)   | 2026          | 45,928,000                           | -                   |                  | 45,928,000       | 6,889,200                       |   | 39,038,800                      | 30,059,876                   | 8,978,924                        |
| 5         | 5th Line Widening (Britannia Road to Lower Base Line) (4 lane)                               | 2045-2050     | 29,617,000                           | -                   |                  | 29,617,000       | 4,442,600                       |   | 25,174,400                      | 19,384,288                   | 5,790,112                        |
| 6         | Fifth Line Intersections (Louis St Laurent to Britannia Rd)                                  | 2030-2031     | 3,845,000                            | -                   |                  | 3,845,000        | -                               |   | 3,845,000                       | 2,960,650                    | 884,350                          |
| 7         | 5th Line (Main Street E to Yukon Court)  | 2029-2030     | 9,478,000                            | -                   |                  | 9,478,000        | -                               |   | 9,478,000                       | 7,298,060                    | 2,179,940                        |
| 8         | 6th Line (Hwy 401 to Derry Road) (4 lane)  | 2027-2030     | 37,902,000                           | -                   |                  | 37,902,000       | 5,685,300                       |   | 32,216,700                      | 24,806,859                   | 7,409,841                        |
| 9         | 6th Line Widening (Derry Road to Britannia Road) (4 lane)                                    | 2029-2032     | 37,687,000                           | -                   |                  | 37,687,000       | 5,653,100                       |   | 32,033,900                      | 24,666,103                   | 7,367,797                        |
| 10        | 6th Line Urbanization (Britannia to Lower Base Line) (structure)                             | 2045-2049     | 4,169,000                            | -                   |                  | 4,169,000        | 625,400                         |   | 3,543,600                       | 2,728,572                    | 815,028                          |
| 11        | 6th Line Widening (Britannia to Lower Base Line) (4 lane)                                    | 2045-2049     | 30,472,000                           | -                   |                  | 30,472,000       | 4,570,800                       |   | 25,901,200                      | 19,943,924                   | 5,957,276                        |
| 12        | Louis St. Laurent Extension (5th Line to 6th Line) (4 lane)                                  | 2027-2029     | 21,407,000                           | -                   |                  | 21,407,000       | -                               |   | 21,407,000                      | 16,483,390                   | 4,923,610                        |
| 13        | Louis St. Laurent Extension (Fifth Line to Trafalgar) - EA                                   | 2026          | 1,078,000                            | -                   |                  | 1,078,000        | -                               |   | 1,078,000                       | 830,060                      | 247,940                          |
| 14        | New Traffic Signals  | 2026-2051     | 10,556,000                           | -                   |                  | 10,556,000       | 1,055,600                       |   | 9,500,400                       | 7,315,308                    | 2,185,092                        |
| 15        | Preemption Traffic Control System  | 2026-2051     | 1,302,950                            | -                   |                  | 1,302,950        | 130,300                         |   | 1,172,650                       | 902,941                      | 269,710                          |
| 16        | Main Street (Trafalgar to west of Hwy 407) (4 lane)  | 2045-2049     | 30,270,000                           | -                   |                  | 30,270,000       | -                               |   | 30,270,000                      | 23,307,900                   | 6,962,100                        |
| 17        | Roadway Restriping (Associated with Newly Constructed Roads)                                 | 2030-2034     | 449,000                              | -                   |                  | 449,000          | -                               |   | 449,000                         | 345,730                      | 103,270                          |
| 18        | Louis St. Laurent Extension (6th Line to Trafalgar) (Bridge)                                 | 2041-2043     | 20,207,000                           | -                   |                  | 20,207,000       | -                               |   | 20,207,000                      | 15,559,390                   | 4,647,610                        |
| 19        | Louis St. Laurent Extension (6th Line to Trafalgar) (4 lane)                                 | 2041-2043     | 17,302,000                           | -                   |                  | 17,302,000       | -                               |   | 17,302,000                      | 13,322,540                   | 3,979,460                        |
| 20        | Britannia Road (Tremaine Rd to MEV West Boundary) (4 lane)                                   | 2037-2039     | 5,092,000                            | -                   |                  | 5,092,000        | 763,800                         |   | 4,328,200                       | 3,332,714                    | 995,486                          |
| 21        | Lower Base Line (Fourth Line to Fifth Line) (2 lane extension)                               | 2039-2041     | 29,386,000                           | -                   |                  | 29,386,000       | -                               |   | 29,386,000                      | 22,627,220                   | 6,758,780                        |
| 22        | Lower Base Line (Fifth Line to Town East Boundary) (4 lanes)                                 | 2045-2050     | 56,645,000                           | -                   |                  | 56,645,000       | 8,496,800                       |   | 48,148,200                      | 37,074,114                   | 11,074,086                       |
| 23        | Main Street E MTSA South Side (Wilson Dr to Thompson Rd)                                     | 2036-2051     | 4,299,000                            | -                   |                  | 4,299,000        | 1,074,800                       |   | 3,224,200                       | 2,482,634                    | 741,566                          |
| 24        | Intersection Improvement Costs   | 2026-2028     | 3,401,000                            | -                   |                  | 3,401,000        | 340,100                         |   | 3,060,900                       | 2,356,893                    | 704,007                          |
| 25        | Lower Base Line - Tremaine to RR 25 - widening to 4 lanes;                                   | 2041-2046     | 37,371,000                           | -                   |                  | 37,371,000       | 5,605,700                       |   | 31,765,300                      | 24,459,281                   | 7,306,019                        |
| 26        | Lower Base Line - RR 25 to new JSP - widening to 4 lanes                                     | 2043-2048     | 61,213,000                           | -                   |                  | 61,213,000       | 5,509,200                       | 24,485,200  | 31,218,600                      | 24,038,322                   | 7,180,278                        |
| 28        | NW Arterial Britannia Secondary Plan (Louis St. Laurent to Secondary Plan Boundary) - 4 Lane | 2035+         | 10,900,000                           | -                   |                  | 10,900,000       | -                               |   | 10,900,000                      | 8,393,000                    | 2,507,000                        |
|           | <b>BRIDGES &amp; STRUCTURES</b>  |               |                                      |                     |                  |                  | -                               |   |                                 |                              |                                  |
| 29        | Main Street Crossing (Trafalgar to 407)  | 2045-2049     | 18,909,000                           | -                   |                  | 18,909,000       | -                               |   | 18,909,000                      | 14,559,930                   | 4,349,070                        |
| 30        | 16 Mile Creek Crossing   | 2030          | 3,576,000                            | -                   |                  | 3,576,000        | -                               |   | 3,576,000                       | 2,753,520                    | 822,480                          |
|           | <b>ACTIVE TRANSPORTATION:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                              |                                  |
| 31        | Derry Green Union Gas Pipeline Easement (Asphalt trails and 2 pedestrian bridges)            | 2029          | 1,899,000                            | -                   |                  | 1,899,000        | -                               |   | 1,899,000                       | 1,462,230                    | 436,770                          |



Table 5-7  
Infrastructure Cost Included in the Development Charges Calculation  
Parks and Recreation Services

| Proj. No.    | Increased Service Needs Attributable to Anticipated Development                          | Timing (year) | Gross Capital Cost Estimate (2025\$) | Post Period Benefit | Other Deductions | Net Capital Cost | Less:                           |   | Potential D.C. Recoverable Cost |                   |                       |
|--------------|--|---------------|--------------------------------------|---------------------|------------------|------------------|---------------------------------|---|---------------------------------|-------------------|-----------------------|
|              |  |               |                                      |                     |                  |                  | Benefit to Existing Development | Grants, Subsidies and Other Contributions Attributable to New Development | Total                           | Residential Share | Non-Residential Share |
| 2025 to 2051 |  |               |                                      |                     |                  |                  |                                 |   | 95%                             | 5%                |                       |
|              | <b>Recreation Facilities</b>   |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 1            | Boyne Community Centre (Arena (2) Ice pads, Indoor Pool, Gymnasium, Multi-Purpose Space) | 2028-2030     | 141,570,000                          | -                   |                  | 141,570,000      | -                               |   | 141,570,000                     | 134,491,500       | 7,078,500             |
|              | <b>Britannia:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 2            | Arena - Twin Pad   | 2035+         | 84,700,000                           | -                   |                  | 84,700,000       | -                               |   | 84,700,000                      | 80,465,000        | 4,235,000             |
| 3            | Indoor Pool  | 2035+         | 67,760,000                           | -                   |                  | 67,760,000       | -                               |   | 67,760,000                      | 64,372,000        | 3,388,000             |
| 4            | Gymnasium  | 2035+         | 31,460,000                           | -                   |                  | 31,460,000       | -                               |   | 31,460,000                      | 29,887,000        | 1,573,000             |
| 5            | Multi-purpose Spaces   | 2035+         | 7,260,000                            | -                   |                  | 7,260,000        | -                               |   | 7,260,000                       | 6,897,000         | 363,000               |
|              | <b>Trafalgar/Agerton:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 6            | Arena - Twin Pad   | 2035+         | 84,700,000                           | -                   |                  | 84,700,000       | -                               |   | 84,700,000                      | 80,465,000        | 4,235,000             |
| 7            | Indoor Pool  | 2035+         | 33,880,000                           | -                   |                  | 33,880,000       | -                               |   | 33,880,000                      | 32,186,000        | 1,694,000             |
| 8            | Gymnasium  | 2035+         | 15,730,000                           | -                   |                  | 15,730,000       | -                               |   | 15,730,000                      | 14,943,500        | 786,500               |
| 9            | Multi-purpose Spaces   | 2035+         | 7,260,000                            | -                   |                  | 7,260,000        | -                               |   | 7,260,000                       | 6,897,000         | 363,000               |
|              | <b>MEV:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 10           | Arena - Twin Pad   | 2035+         | 84,700,000                           | -                   |                  | 84,700,000       | -                               |   | 84,700,000                      | 80,465,000        | 4,235,000             |
| 11           | Indoor Pool  | 2035+         | 33,880,000                           | -                   |                  | 33,880,000       | -                               |   | 33,880,000                      | 32,186,000        | 1,694,000             |
| 12           | Gymnasium  | 2035+         | 31,460,000                           | -                   |                  | 31,460,000       | -                               |   | 31,460,000                      | 29,887,000        | 1,573,000             |
| 13           | Multi-Purpose Spaces   | 2035+         | 7,260,000                            | -                   |                  | 7,260,000        | -                               |   | 7,260,000                       | 6,897,000         | 363,000               |
|              | <b>Intensification:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 14           | Arena - Twin Pad   | 2035+         | 84,700,000                           | -                   |                  | 84,700,000       | -                               |   | 84,700,000                      | 80,465,000        | 4,235,000             |
| 15           | Indoor Pool  | 2035+         | 33,880,000                           | -                   |                  | 33,880,000       | -                               |   | 33,880,000                      | 32,186,000        | 1,694,000             |
| 16           | Gymnasium  | 2035+         | 31,460,000                           | -                   |                  | 31,460,000       | -                               |   | 31,460,000                      | 29,887,000        | 1,573,000             |
| 17           | Multi-Purpose Spaces   | 2035+         | 7,260,000                            | -                   |                  | 7,260,000        | -                               |   | 7,260,000                       | 6,897,000         | 363,000               |
|              | <b>Community Expansion Area:</b>   |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 18           | Arena - Twin Pad   | 2035+         | 169,400,000                          | -                   |                  | 169,400,000      | -                               |   | 169,400,000                     | 160,930,000       | 8,470,000             |
| 19           | Indoor Pool  | 2035+         | 67,760,000                           | -                   |                  | 67,760,000       | -                               |   | 67,760,000                      | 64,372,000        | 3,388,000             |
| 20           | Gymnasium  | 2035+         | 31,460,000                           | -                   |                  | 31,460,000       | -                               |   | 31,460,000                      | 29,887,000        | 1,573,000             |
| 21           | Multi-purpose Spaces   | 2035+         | 14,520,000                           | -                   |                  | 14,520,000       | -                               |   | 14,520,000                      | 13,794,000        | 726,000               |
|              | <b>Parkland Development</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
|              | <b>Trails/Linear Parks:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 22           | New Trail Development  | 2027          | 1,070,000                            | -                   |                  | 1,070,000        | -                               |   | 1,070,000                       | 1,016,500         | 53,500                |
| 23           | Linear Park Multi Use Trail - Coates South (4b)  | 2028          | 1,000,000                            | -                   |                  | 1,000,000        | -                               |   | 1,000,000                       | 950,000           | 50,000                |
| 24           | Milton Heights Tributary Trails  | 2027          | 1,550,000                            | -                   |                  | 1,550,000        | -                               |   | 1,550,000                       | 1,472,500         | 77,500                |



Table 5-7 (Cont'd)  
Infrastructure Cost Included in the Development Charges Calculation  
Parks and Recreation Services

| Proj. No.    | Increased Service Needs Attributable to Anticipated Development | Timing (year) | Gross Capital Cost Estimate (2025\$) | Post Period Benefit | Other Deductions | Net Capital Cost | Less:                           |   | Potential D.C. Recoverable Cost |                   |                       |
|--------------|---|---------------|--------------------------------------|---------------------|------------------|------------------|---------------------------------|---|---------------------------------|-------------------|-----------------------|
|              |   |               |                                      |                     |                  |                  | Benefit to Existing Development | Grants, Subsidies and Other Contributions Attributable to New Development | Total                           | Residential Share | Non-Residential Share |
| 2025 to 2051 |   |               |                                      |                     |                  |                  |                                 |   | 95%                             | 5%                |                       |
|              | <u>Parkland Amenities</u>                                       |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 122          | Playground Equipment - Village Square                           | 2035+         | 1,410,000                            | -                   |                  | 1,410,000        | -                               |   | 1,410,000                       | 1,339,500         | 70,500                |
| 123          | Shelter - Minor   | 2035+         | 840,000                              | -                   |                  | 840,000          | -                               |   | 840,000                         | 798,000           | 42,000                |
|              | <b>Community Expansion Area</b>                                 |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
|              | <u>Parkland Development</u>                                     |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 124          | Village Squares   | 2035+         | 7,540,000                            | -                   |                  | 7,540,000        | -                               |   | 7,540,000                       | 7,163,000         | 377,000               |
| 125          | Neighbourhood Parks   | 2035+         | 6,160,000                            | -                   |                  | 6,160,000        | -                               |   | 6,160,000                       | 5,852,000         | 308,000               |
| 126          | District Parks  | 2035+         | 9,860,000                            | -                   |                  | 9,860,000        | -                               |   | 9,860,000                       | 9,367,000         | 493,000               |
|              | <u>Parkland Amenities</u>                                       |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 127          | Playground Equipment - Village Square                           | 2035+         | 4,940,000                            | -                   |                  | 4,940,000        | -                               |   | 4,940,000                       | 4,693,000         | 247,000               |
| 128          | Playground Equipment - Neighbourhood Park                       | 2035+         | 1,010,000                            | -                   |                  | 1,010,000        | -                               |   | 1,010,000                       | 959,500           | 50,500                |
| 129          | Playground Equipment - District Park                            | 2035+         | 700,000                              | -                   |                  | 700,000          | -                               |   | 700,000                         | 665,000           | 35,000                |
| 130          | Hardball/Baseball - (lit)                                       | 2035+         | 1,080,000                            | -                   |                  | 1,080,000        | -                               |   | 1,080,000                       | 1,026,000         | 54,000                |
| 131          | Slo-Pitch/Softball - (lit)                                      | 2035+         | 700,000                              | -                   |                  | 700,000          | -                               |   | 700,000                         | 665,000           | 35,000                |
| 132          | Major Soccer Field - (lit)                                      | 2035+         | 12,460,000                           | -                   |                  | 12,460,000       | -                               |   | 12,460,000                      | 11,837,000        | 623,000               |
| 133          | Beach Volleyball - Lit  | 2035+         | 170,000                              | -                   |                  | 170,000          | -                               |   | 170,000                         | 161,500           | 8,500                 |
| 134          | Tennis Courts - Lit   | 2035+         | 380,000                              | -                   |                  | 380,000          | -                               |   | 380,000                         | 361,000           | 19,000                |
| 135          | Multi-Purpose Court - (lit)                                     | 2035+         | 300,000                              | -                   |                  | 300,000          | -                               |   | 300,000                         | 285,000           | 15,000                |
| 136          | Multi-use Half Court  | 2035+         | 200,000                              | -                   |                  | 200,000          | -                               |   | 200,000                         | 190,000           | 10,000                |
| 137          | Shelter - Major   | 2035+         | 480,000                              | -                   |                  | 480,000          | -                               |   | 480,000                         | 456,000           | 24,000                |
| 138          | Shelter - Minor   | 2035+         | 3,360,000                            | -                   |                  | 3,360,000        | -                               |   | 3,360,000                       | 3,192,000         | 168,000               |
| 139          | Skateboard Area - Minor   | 2035+         | 660,000                              | -                   |                  | 660,000          | -                               |   | 660,000                         | 627,000           | 33,000                |
| 140          | Spray Pad - Major   | 2035+         | 1,340,000                            | -                   |                  | 1,340,000        | -                               |   | 1,340,000                       | 1,273,000         | 67,000                |
| 141          | Spray Pad - Minor   | 2035+         | 1,080,000                            | -                   |                  | 1,080,000        | -                               |   | 1,080,000                       | 1,026,000         | 54,000                |
|              | <b>External to Secondary Plans</b>                              |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
|              | <u>Parkland Development</u>                                     |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 142          | District Parks  | 2035+         | 4,690,000                            | -                   |                  | 4,690,000        | -                               |   | 4,690,000                       | 4,455,500         | 234,500               |
| 143          | Community Parks   | 2035+         | 48,550,000                           | -                   |                  | 48,550,000       | -                               |   | 48,550,000                      | 46,122,500        | 2,427,500             |

**Schedule D**

Page D-28 from Halton Region's 2022 Development Charges Background Study

Halton Region  
2022 Development Charge Study  
Roads Capital Projects - Total (\$2022, 5000's)

Table D-11

| Unique ID | Description   | 2023  | 2024   | 2025   | 2026   | 2027   | Sub-total |           | Total<br>2023-2031 | Bynd 2031<br>(Ovrszng) | Non-Growth | Net Growth | Residential | Non Residential |
|-----------|---|-------|--------|--------|--------|--------|-----------|-----------|--------------------|------------------------|------------|------------|-------------|-----------------|
|           |   |       |        |        |        |        | 2023-2027 | 2028-2031 |                    |                        |            |            |             |                 |
| 7567      | Miscellaneous R.O.W. Purchases and Road Dedication Engineering & Surveys (REG)  | 100   | 100    | -      | -      | -      | 200       | -         | 200                | -                      | 200        | -          | -           | -               |
| 7853      | Traffic Signal Interconnect (REG)   | 150   | 150    | 150    | 150    | 150    | 750       | 600       | 1,350              | -                      | 1,350      | -          | -           | -               |
| 7854      | Operational Improvements (REG)  | 200   | 200    | 200    | 200    | 200    | 1,000     | 1,100     | 2,100              | -                      | 2,100      | -          | -           | -               |
| 2659      | Guelph Line - Widening from 4 to 6 lanes from Mainway to Upper Middle Road (BUR) (Reg. Rd. 1)   | 850   | -      | 2,498  | 9,562  | 17,198 | 30,128    | -         | 30,128             | -                      | 3,917      | 26,209     | 16,774      | 9,435           |
| 6806      | Guelph Line - Widening from 4 to 6 lanes from Upper Middle Road to Dundas Street (Regional Road 1) (BUR)  | -     | -      | -      | -      | 850    | 850       | 28,408    | 29,258             | 8,191                  | 2,317      | 18,748     | 11,999      | 6,749           |
| 3091      | Trafalgar Rd - Grade Separation at CN Crossing north of Maple Ave (HHS) (Regional Road 3)   | 70    | 32,994 | -      | -      | -      | 33,064    | -         | 33,064             | -                      | 4,298      | 28,766     | 18,410      | 10,356          |
| 5376      | Trafalgar Rd - Grade Separation at Metrolinx Crossing south of Hwy 7 (HHS) (Regional Road 3)  | 70    | 21,018 | -      | -      | -      | 21,088    | -         | 21,088             | -                      | 2,952      | 18,134     | 11,605      | 6,529           |
| 6823      | Trafalgar Road - Widening from 4 to 6 lanes from Highway 407 to Britannia Road (ML) (Regional Road 3)   | -     | 5,003  | 2,203  | 648    | 34,851 | 42,705    | -         | 42,705             | -                      | 4,270      | 38,435     | 24,598      | 13,837          |
| 6927      | Trafalgar Road - Widening from 4 to 6 lanes from Britannia Road to Steeles Avenue including Highway 401 Structure (ML) (Regional Road 3)              | -     | -      | -      | 9,164  | 5,030  | 14,194    | 66,847    | 81,041             | -                      | 6,483      | 74,558     | 47,717      | 26,841          |
| 7756      | Trafalgar Road Widening from 2 to 4 Lanes from 10 Side Road to Hwy 7 (HHS) (Regional Road 3)  | 234   | 60,419 | -      | -      | -      | 60,653    | -         | 60,653             | -                      | 12,737     | 47,916     | 30,666      | 17,250          |
| 5830      | James Snow Parkway - Widening from 4 to 6 lanes from Highway 401 to Britannia Road (ML) (Regional Road 4)   | -     | 3,918  | 23,663 | 30,428 | -      | 58,008    | -         | 58,008             | -                      | 4,060      | 53,948     | 34,524      | 19,421          |
| 6906      | James Snow Parkway - New 6 lane road from Highway 407 to Britannia Road (ML) (Regional Road 4)  | -     | 1,100  | -      | -      | 4,968  | 6,068     | 80,207    | 86,273             | 6,039                  | -          | 80,234     | 51,351      | 28,883          |
| 6907      | James Snow Parkway - Widening from 4 to 6 lanes from Highway 401 to Tremaine Road (ML) (Regional Road 4)  | 850   | -      | 9,515  | 31,598 | 1,179  | 43,142    | 67,396    | 110,538            | -                      | 3,316      | 107,222    | 68,621      | 38,601          |
| 7487      | Dundas Street - Widening from 4 to 6 lanes from Guelph Line to Halton/Hamilton Boundary, including improvements at Brant Street (BUR) Regional Road 5 | -     | 192    | 28,465 | -      | -      | 28,657    | -         | 28,657             | -                      | 9,456      | 19,201     | 12,289      | 6,912           |
| 6757      | "5 1/2 Line" - New 6 lane road from Britannia Road to Steeles Avenue & Interchange at Highway 401 (ML)  | 1,600 | -      | 11,031 | -      | 91,042 | 103,673   | 79,138    | 182,811            | 3,657                  | -          | 179,154    | 114,659     | 64,495          |
| 6804      | Derry Road - Widening from 4 to 6 lanes from Tremaine Road to Highway 407 (ML) (Regional Road 7)  | -     | -      | -      | 850    | -      | 850       | 131,360   | 132,210            | 6,611                  | 12,561     | 113,038    | 72,345      | 40,693          |

February 6, 2026

Mayor Krantz and Members of Council  
Town of Milton  
150 Mary Street Milton, ON L9T 6Z5

Dear Mayor Krantz and Members of Council:

**RE: Town of Milton Draft 2025 Development Charges Background Study  
February 9, 2026, Council Meeting  
Report No. ES-005-26  
Argo Development Corp – Comments**

---

We are writing to you as a Landowner in the Town of Milton, including (but not limited to) the MP4 Britannia West and South Milton Landowners Group. We have significant land holdings in the Town of Milton which will be directly impacted by the proposed DC background Study and future DCs.

This letter contains our preliminary comments on the Town of Milton Development Charge (DC) Background Study, dated December 2025, as prepared by Watson & Associates. Our Team attended both engagement sessions for the DC and CBC Background Studies on December 1, 2025, and January 27, 2026, and appreciated the Town's presentation and discussion on these two studies.

We offer the following commentary on the proposed DC Background Study and economic hardships that the development industry is currently facing.

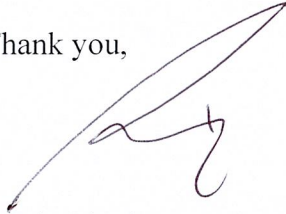
The new DC rate proposes a significant increase to the existing DCs in the Town of Milton. Single and Semi-detached dwelling units are proposed to increase by approximately 38% for new housing within the Britannia Secondary Plan from \$30,299 to \$41,932. It should be noted that GTA new home sales are now at their lowest point in more than 50 years. Given the current economic and housing market conditions, this gives us great concern.

At this time, we are asking the Town to consider similar actions to other nearby municipalities within the Greater Toronto Area who have reduced, frozen or eliminated DC (for a period of time). Argo is committed to supporting the Town with discussions at the Provincial level to discuss various potential solutions as a result of any DCs reforms (reduction, freeze, elimination) to continue to deliver the infrastructure required to support the delivery of housing.

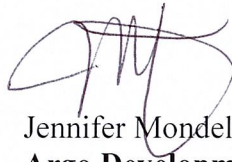
We are continuing to review the Background Study and may provide further detailed comments to better understand the assumptions and timing proposed in the DC Background Study and would offer discussing any impacts DC reforms may have to the Towns' cashflow.

Thank you for your time to consider our comments and we look forward to further discussions on how the Town and development industry can work towards addressing these current crises that the housing industry is facing collectively.

Thank you,



Kevin Singh  
**Argo Development Corp.**



Jennifer Mondell  
**Argo Development Corp.**



**David Schaeffer Engineering Ltd.**  
600 Alden Road, Suite 606  
Markham, ON L3R 0E7  
905-475-3080  
dsel.ca

February 6, 2026  
Our File: 1008

**Town of Milton**

*[Delivery Method: E-mail]*

150 Mary Street  
Milton, Ontario  
L9T 6Z5

**Attention: Mayor Kranz and Members of Council**

Dear Members of Council and Staff:

**Re: 2025 Development Charge Background Study Update**  
Agerton New Urban Landowners Group  
Town of Milton, Ontario

We are the Group Manager for the Agerton New Urban Ltd. Landowners Group ("Agerton LOG") encompassing lands within the Agerton Secondary Plan in the Town of Milton. Participating landowners within the Agerton LOG include:

- Agerton Capital Inc.
- 662073 Ontario Limited
- York Trafalgar Properties Inc.
- Derry Centralia Inc.
- 2689229 Ontario Inc.

We are in receipt of the draft 2025 Development Charge (DC) Background Study (BS) Update prepared by Watson & Associates Economists Ltd., dated December 19, 2025 which is being presented as part of the Town of Milton's Public Meeting agenda on February 9.

The proposed DC rates contemplated in the draft study represent increases in excess of 50% for lands within the Agerton Secondary Plan. The substantial increase on medium and high-density units within the proposed Protected Major Transit Station Area (PMTSA) is inconsistent with the current economic climate, where market conditions already present a challenge to development activity and building permit absorption. Any increases in Development Charges could threaten project viability and hinder the delivery of essential housing, community infrastructure, and building permit revenue for the Town.

Our team is currently undertaking a thorough review of the document. Our key preliminary comments include:

- Significant increases in the Parks and Recreation scope and costs require further detailed costing information and justification. Particularly in the absence of a supporting Parks and Recreation Master Plan, the assumed quantum and cost of proposed facilities is unjustified. Increases in costs from the 2021 DC Study do not appear to be reasonable.
- Inclusion of land costs requires additional details related to land area calculations and land value assumptions.

We understand the Building Industry and Land Development Association (BILD) will be providing comments to Milton Council as part of the public meeting. The Agerton LOG supports the concerns raised in the BILD letter. We will provide a comprehensive set of written comments once our analysis is complete, and we appreciate your attention to this matter.

We request continued collaboration to address our concerns provided in this letter and those forthcoming through our detailed review. With this, we request that Milton Council defer approval of the proposed DC Background Study and implementing By-law to allow the time needed.

Should you have any questions, please contact the undersigned.

Yours truly,  
**David Schaeffer Engineering Ltd**



1008\_DC Review Letter-260206.docx

Per: John Tjeerdsma, P. Eng.

cc: Agerton New Urban Landowners Group



**David Schaeffer Engineering Ltd.**  
600 Alden Road, Suite 606  
Markham, ON L3R 0E7  
905-475-3080  
dsel.ca

February 6, 2026  
Our File: 1008

**Town of Milton**

*[Delivery Method: E-mail]*

150 Mary Street  
Milton, Ontario  
L9T 6Z5

**Attention: Mayor Kranz and Members of Council**

Dear Members of Council and Staff:

**Re: 2025 Development Charge Background Study Update**  
Milton P4 Trafalgar Landowners Group  
Town of Milton, Ontario

We are the Group Manager for the Milton P4 Trafalgar Landowners Group Inc. ("Trafalgar LOG") encompassing lands within the Trafalgar Secondary Plan in the Town of Milton. Participating landowners within the Trafalgar LOG include:

- Trinson Management Corp (Frontenac Forest Estates Inc.)
- Remington Group (Remington Trafalgar Inc., TRGI West Properties Inc.)
- Mattamy Homes (White Squadron Development Corporation)
- York Trafalgar Corp. (Hannover Trafalgar Farms Limited & Milton Sheva Land Limited O/A Hornby Land JV, York Trafalgar Golf Corp., Comarin Corp)

We are in receipt of the draft 2025 Development Charge (DC) Background Study (BS) Update prepared by Watson & Associates Economists Ltd., dated December 19, 2025 which is being presented as part of the Town of Milton's Public Meeting agenda on February 9.

The proposed DC rates contemplated in the draft study represent increases in the range of 40% to 50% for lands within the Trafalgar Secondary Plan. Buildout of Trafalgar lands is expected to generate a significant portion of the DC revenue during the five-year term of the next DC By-law. This substantial increase is inconsistent with the current economic climate, where market conditions already present a challenge to development activity and building permit absorption. Any increases in Development Charges could threaten project viability and hinder the delivery of essential housing, community infrastructure, and building permit revenue for the Town.

Our team is currently undertaking a thorough review of the document. Our key preliminary comments include:

- Significant increases in the Parks and Recreation scope and costs require further detailed costing information and justification. Particularly in the absence of a supporting Parks and Recreation Master Plan, the assumed quantum and cost of proposed facilities is unjustified. Increases in costs from the 2021 DC Study do not appear to be reasonable.
- Eighth Line improvements should be considered for inclusion in the DC as its location, function, and configuration exceeds a typical local service.
- Inclusion of land costs requires additional details related to land area calculations and land value assumptions.

We understand the Building Industry and Land Development Association (BILD) will be providing comments to Milton Council as part of the public meeting. The Trafalgar LOG supports the concerns raised in the BILD letter. We will provide a comprehensive set of written comments once our analysis is complete, and we appreciate your attention to this matter.

We request continued collaboration to address our concerns provided in this letter and those forthcoming through our detailed review. With this, we request that Milton Council defer approval of the proposed DC Background Study and implementing By-law to allow the time needed.

Should you have any questions, please contact the undersigned.

Yours truly,  
**David Schaeffer Engineering Ltd**



1008\_DC Review Letter-260206.docx

Per: John Tjeerdsma, P. Eng.

cc: Milton P4 Trafalgar Landowners Group



February 7, 2026

Mayor Krantz and Members of Council  
Town of Milton  
150 Mary Street  
Milton, ON  
L9T 6Z5

Sent via email to clerks.

RE: 2026 Development Charges and Community Benefits Strategy Review  
Town of Milton

---

The Building Industry and Land Development Association (BILD) submits this correspondence as part of the Town of Milton's Public Meeting regarding Item 7.6- Development Charges and Community Benefits Charges, scheduled for February 9.

Attached for Council's reference is the letter previously submitted to staff on January 30, which outlines BILD's comments on the proposed review, as well as a memorandum prepared by our consultant, KR Planning.

Since submitting that correspondence, BILD has met with Town staff and will continue to engage and consult further as this work progresses. We appreciate the opportunity to participate in these discussions and thank staff for their ongoing collaboration.

Kind regards,

A handwritten signature in black ink, appearing to read "Victoria Mortelliti".

Victoria Mortelliti, MCIP, RPP  
Director, Policy & Advocacy

CC: BILD Halton Forum Members

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*The Building Industry and Land Development Association is an advocacy and educational group representing the building, land development and professional renovation industry in the Greater Toronto Area. BILD is the largest home builders' association in Canada, and is affiliated with the Ontario Home Builders' Association and the Canadian Home Builders' Association. It's 1,000 member companies consists not only of direct industry participants but also of supporting companies such as financial and professional service organizations, trade contractors, as well as manufacturers and suppliers of home-related products.*



January 30, 2026

Melanie Wallhouse  
Manager, Development Finance & Financial Consulting  
Town of Milton  
150 Mary Street  
Milton, ON  
L9T 6Z5

Sent via email to [melanie.wallhouse@milton.ca](mailto:melanie.wallhouse@milton.ca)

RE: 2026 Development Charges and Community Benefits Strategy Review  
Town of Milton

---

The Building Industry and Land Development Association (BILD) is submitting this correspondence in response to the Town of Milton's 2026 Development Charge By-law and Background Study, as well as the accompanying Community Benefits Charges Strategy/By-law, ahead of the February 9th public meeting. On behalf of our Halton Forum, we appreciate the opportunity to provide the following comments.

To begin, we would like to thank Town staff for hosting the stakeholder engagement session held on January 27. The walkthrough of the DC review and the opportunity for open discussion with industry stakeholders was greatly appreciated.

As is standard practice in similar reviews across the Greater Toronto Area, BILD has retained Daryl Keleher of KR Planning Group to conduct a detailed review of the Development Charge Background Study on behalf of our membership. Enclosed, you will find a memorandum prepared by our consultant for the Town's review. Please note, that in advance of the February 9<sup>th</sup> public meeting, BILD will also share this memorandum with Council in order to be made part of the public record.

It is important to note that BILD and our members recognize the foundation for development charges and the role they play in funding the Town's future growth. Though, BILD must emphasize the current realities of the housing market and the additional challenges that the proposed increases in development charges would create, placing further strain on the delivery of new housing in Milton.

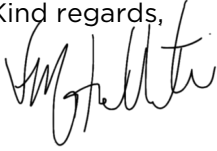
Altus Group's most recent data for new home sales in December 2025 highlights the current challenges in the housing market, with sales in the Greater Toronto Area (GTA) remaining at historically low levels. December 2025 saw just 240 new home sales across the GTA, marking an 82% decline from the 10-year average and a 24% decrease compared to December 2024. These results contributed to a total of 5,314 new home sales for the full year, the lowest annual figure ever recorded since BILD began tracking in 1981.

Breaking this down by housing type, condominium apartments accounted for 87 sales, down 42% from December 2024 and 91% below the 10-year average. While single-family homes recorded 153 sales, down 8% year-over-year and 59% below the 10-year average. Total remaining inventory across the GTA decreased slightly to 20,849 units.

Benchmark prices remain elevated, with new condos averaging \$1,021,235 and new single-family homes averaging \$1,409,725. While the latter reflects a 9% decrease over the past 12 months, prices remain at levels that continue to challenge affordability for many buyers.

We hope that, as this review progresses, the Town will continue to work collaboratively with the development industry to explore all opportunities that support the delivery of new housing. We appreciate the opportunity to contribute to this important process and to remain actively engaged. We look forward to receiving a written response and continuing our constructive collaboration.

Kind regards,

A handwritten signature in black ink, appearing to read "Victoria Mortelliti".

Victoria Mortelliti, MCIP, RPP  
Director, Policy & Advocacy

CC: BILD Halton Forum Members

\*\*\*

*The Building Industry and Land Development Association is an advocacy and educational group representing the building, land development and professional renovation industry in the Greater Toronto Area. BILD is the largest home builders' association in Canada, and is affiliated with the Ontario Home Builders' Association and the Canadian Home Builders' Association. It's 1,000 member companies consists not only of direct industry participants but also of supporting companies such as financial and professional service organizations, trade contractors, as well as manufacturers and suppliers of home-related products.*



## MEMORANDUM

27 January 2026

**To:** Victoria Mortelliti  
BILD

**From:** Daryl Keleher, Principal  
KR Planning Group

**Re:** Milton DC Review  
**Our File:** P1298

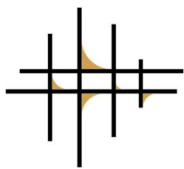
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KR Planning Group was retained by BILD to review the materials released by the Town of Milton in support of its proposed development charges (DC) and community benefits charge (CBC) by-laws, including the associated background studies. This memorandum presents questions and comments from my initial review of the publicly available DC/CBC studies.

## Questions and Comments – DC Study

### 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?
  - 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?
  - c) How have on-campus students been factored into the DC study calculations?
- 2) 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?
- 3) 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?



- 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?

### 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                 | Change in Population in Existing Units |               |                 |
|--------------------------------|--|---------------|-----------------|
|                                | (2025)                                 | 2025-2035     | 2036-2051       |
| Pre-HUSP                       |  | 1,850         | (3,340)         |
| Bristol                        |  | 4,317         | (7,777)         |
| Sherwood                       |  | 2,846         | (5,134)         |
| Boyne                          |  | 1,184         | (2,135)         |
| MEV                            |  | -             | -               |
| Britannia Secondary Plan       |  | 16            | (29)            |
| Agerton Secondary Plan         |  | 2             | (3)             |
| Trafalgar Secondary Plan       |  | 8             | (14)            |
| Community Area Expansion Lands |  | -             | -               |
| Rural                          |  | 619           | (1,116)         |
| <b>Total</b>                   | <b>46,280</b>                          | <b>10,842</b> | <b>(19,548)</b> |
| Change in PPU                  |  | 0.23          | (0.42)          |

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

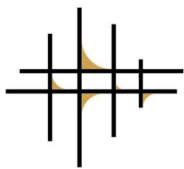
- 6) Schedule 7B is used to establish PPU assumptions for apartment units, using Halton Region data from the 2021 Census. Has the Town’s consultant obtained data similar to Schedule 7A that is for the Town only?

### Studies

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

### 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?
- 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?
- 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).

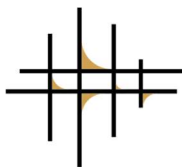
The calculation of BTE for Access+ vehicles is based on estimating the number of existing residents that will age-into the need for the service, and are estimated to be 11.5% of the growth in registrants.

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.

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



- 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.

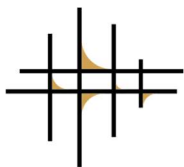
Figure 1

| Differences in BTE for Road Segment and Land Acquisition Costs, 2025 Milton DC Study |   |                |            |       |                |              |            |               |
|--|---|----------------|------------|-------|----------------|--------------|------------|---------------|
| Project #  | Road Segment  | Land           |            |       | Roads Project  |              | Roads      | Updated Land  |
|  |   | Cost           | BTE        | BTE % | Cost           | BTE          | BTE%       | BTE to Match  |
| 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

## 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?
- 17) What is the basis for 0% PPB allocation for projects such as 5<sup>th</sup> Line Widening from Britannia to Lower Base Line scheduled for 2045-2050?
- 18) What is the nature of the “Lower Base Line – 4<sup>th</sup> Line to 5<sup>th</sup> 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 4<sup>th</sup> to 5<sup>th</sup> Line captured in project 17?
- 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?
- 20) For project 26 – Lower Base Line from RR25 to new JSP,
- 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?
  - How was this share calculated or determined?
  - Does the Oakville share include their respective share of BTE?
- 21) Regarding the two bridge projects for the Derry Green Union Gas Pipeline easement:
- Where would the two bridge projects located?
  - Does the Town have any plans to connect the sections of gas pipeline trail that terminate on either side of Highway 25?
  - What is the rationale for including the trail in the Roads DC as opposed to the Parks & Recreation DC?
- 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

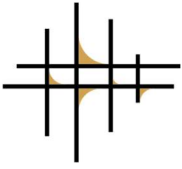


\$3,401,000. What is included in the DC Study that is over and above what is recommended in the TMP Update?

- 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:
- Main Street (Trafalgar to West of 407) – DC study projects 16 (road construction) and project 29 (bridge)
  - Lower Base Line (Tremaine to RR25 – project 25 and RR25 to New JSP – project 26)
  - 5th Line Widening (Britannia to Lower Base Line) – project 5
  - Britannia Road (Tremaine to MEV West Boundary) – project 20
- 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)?
- 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?
- 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?
- 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?
- 28) What costs are included in the various operations centre projects, and what does the “1/3<sup>rd</sup> 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

## **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?
- 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?
- 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.



- 32) What lands are meant to be captured by the projects for lands “External to Secondary Plans”?
- 33) What is the nature of the \$7.34 million line item for “Event Space”?
- 34) What is the basis for including 50% of school lands and other school facilities in the Parks & Recreation LOS inventory?
  - a) What Town costs have been incurred such that they would reflect Town replacement costs of \$120,000 per acre?
  - 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?
  - 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?
- 35) Is the inclusion of the “Maplehurst Diamond” double-counted with the separate inclusion of the “Hardball/Baseball – (lit) (Maplehurst)” line item?
- 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?
- 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?

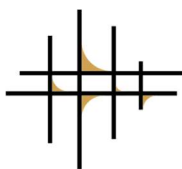


Figure 2

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

|                                 | 2021 DC Study | 2025 DC Study  | % Change |
|---------------------------------|---------------|----------------|----------|
| <b>Boyne CC</b>                 | \$ 58,490,000 | \$ 141,570,000 | 142%     |
| <b>Britannia</b>                |               |                |          |
| 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            | \$ 2,728,000  | \$ 7,260,000   | 166%     |
| Total                           | \$ 76,662,000 | \$ 191,180,000 | 149%     |
| <b>Trafalgar/Agerton</b>        |               |                |          |
| 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            | \$ 2,728,000  | \$ 7,260,000   | 166%     |
| Total                           | \$ 56,312,000 | \$ 141,570,000 | 151%     |
| <b>MEV</b>                      |               |                |          |
| Arena                           | \$ 14,742,000 | \$ 84,700,000  | 475%     |
| Indoor Pool                     | \$ -          | \$ 33,880,000  | n.a.     |
| Gymnasium                       | \$ -          | \$ 31,460,000  | n.a.     |
| Multi-Purpose Spaces            | \$ -          | \$ 7,260,000   | n.a.     |
| Total                           | \$ 14,742,000 | \$ 157,300,000 | 967%     |
| <b>Intensification/Pre-HUSP</b> |               |                |          |
| 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            | \$ 5,456,000  | \$ 7,260,000   | 33%      |
| Total                           | \$ 68,401,000 | \$ 157,300,000 | 130%     |

Source: Town of Milton 2021 and 2025 DC background studies

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?

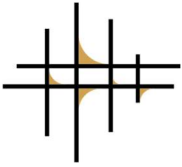
### Library

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?

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?

### 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?



- 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?
- 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?
- 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.

## Melanie Wallhouse

---

**From:** Ore Alade <orea@deltaurban.com>  
**Sent:** February 26, 2026 2:27 PM  
**To:** Glen Cowan  
**Cc:** MB-DevelopmentFinance; Jill Hogan; Melanie Wallhouse  
**Subject:** RE: Town of Milton February 9, 2026 Council Meeting Item 7.6 ES-005-26\_MP4 West LOG Comments on the Draft 2025 DC Background Study

Hi Glen,

Apologies for the delay, please see the below additional 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

### 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

### Increased Capital Costs

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

### 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.
- 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.

### 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

## 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.
- 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
- 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
- 10) No level of Service calculation was undertaken for the acquisition of land
  - a. Please provide this calculation as required by the Act

Thank you,

**Ore Alade, BES**  
**Project Manager III**



**DELTA URBAN**  
EXPERTS IN LAND DEVELOPMENT SERVICES

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**From:** Glen.Cowan@milton.ca <Glen.Cowan@milton.ca>

**Sent:** February 25, 2026 4:17 PM

**To:** Ore Alade <orea@deltaurban.com>

**Cc:** DevelopmentFinance@milton.ca; Stark, Jill <jstark@scsconsultinggroup.com>; melanie.wallhouse@milton.ca; Jill.Hogan@milton.ca

**Subject:** RE: Town of Milton February 9, 2026 Council Meeting Item 7.6 ES-005-26\_MP4 West LOG Comments on the Draft 2025 DC Background Study

Hi Ore,

I've sent a meeting invite with a link for the meeting next Monday, if any adjustments are needed just let me know, and feel free to forward the invite as needed.

We'll keep an eye out for those additional comments as well.

Thanks again

Glen



**David Schaeffer Engineering Ltd.**  
600 Alden Road, Suite 606  
Markham, ON L3R 0E7  
905-475-3080  
dsel.ca

March 4, 2026  
Our File: 1008

**Town of Milton**

*[Delivery Method: E-mail]*

150 Mary Street  
Milton, Ontario  
L9T 6Z5

**Attention: Melanie Wallhouse**  
**Manager, Development Finance and Financial Consulting**

Dear Ms. Wallhouse:

**Re: 2025 Development Charge Background Study – Roads Comments**  
Milton P4 Trafalgar Landowners Group  
Town of Milton, Ontario

We are the Group Manager for the Milton P4 Trafalgar Landowners Group Inc. (“Trafalgar LOG”) encompassing lands within the Trafalgar Secondary Plan in the Town of Milton.

Further to our letter of February 6, 2026 and the meeting held on February 25, 2026, we offer the following comments on the 2025 DC Study related to the roads program:

**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”.
  - o 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.

## 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.

## 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 5<sup>th</sup> Line and 6<sup>th</sup> 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:
  - o **“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.
  - o **“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.

#### 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:
  - o 300K in DC draws from 2021-2024 per DC Annual Statements
  - o 1.4M in “Committed Spending” included in the DC Reserve Fund Balance Dec 2024
  - o 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.

#### 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.

#### 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.

## 7. Main Street Extension (5<sup>th</sup> Line to 6<sup>th</sup> 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:
  - o \$338,789 in DC Reserve Fund Draws from 2022-2024
  - o \$663,909 accounted for in DC “Committed Spending”
  - o \$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?)
  - o \$24,180,000 included in DC Recoverable Costs
  - o 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.

## 8. 5<sup>th</sup> Line Widening (Derry to Britannia)

- The DC appears to include the following construction costs for this project:
  - o \$2,998,686 in DC Reserve Fund Draws from 2022-2024
  - o \$18,599,815 accounted for in DC “Committed Spending”
  - o \$39,038,800 included in DC Recoverable Costs (roadworks)
  - o \$3,854,000 included in DC Recoverable Costs (intersections)
  - o 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.

## 9. 5<sup>th</sup> 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.

## 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.

## 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?

## 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.

Should you have any questions, please contact the undersigned.

Yours truly,  
**David Schaeffer Engineering Ltd**



1008\_DC Comments (Roads)-260304.docx

Per: John Tjeerdsma, P. Eng.

cc: Milton P4 Trafalgar Landowners Group

## Melanie Wallhouse

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**From:** Glen Cowan  
**Sent:** March 5, 2026 9:07 AM  
**To:** Melanie Wallhouse  
**Subject:** FW: Town of Milton February 9, 2026 Council Meeting Item 7.6 ES-005-26\_MP4 West LOG Comments on the Draft 2025 DC Background Study

For our discussion...



**Glen Cowan (he/him)**  
Chief Financial Officer & Treasurer  
150 Mary Street, Milton ON, L9T-6Z5  
905-878-7252 ext. 2151  
[www.milton.ca](http://www.milton.ca)

---

**From:** Ore Alade <orea@deltaurban.com>  
**Sent:** Wednesday, March 4, 2026 5:51 PM  
**To:** Glen Cowan <Glen.Cowan@milton.ca>  
**Subject:** RE: Town of Milton February 9, 2026 Council Meeting Item 7.6 ES-005-26\_MP4 West LOG Comments on the Draft 2025 DC Background Study

Hi Glen,

Thanks for the call this morning – very helpful. As discussed, please see the below additional items raised at the meeting by the landowners and consultants:

### **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?

### **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.

Thank you,

**Ore Alade, BES**  
Project Manager III



**DELTA URBAN**  
EXPERTS IN LAND DEVELOPMENT SERVICES

8800 Dufferin Street, Suite 104 | Vaughan, ON | L4K 0C5 | Tel: 905-660-7667 Ext. 228 | Cell: 226-791-1898 |

E-mail: [orea@deltaurban.com](mailto:orea@deltaurban.com) | Visit us at: <https://deltaurban.com>

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**From:** Ore Alade

**Sent:** March 4, 2026 11:18 AM

**To:** 'Glen.Cowan@milton.ca' <[Glen.Cowan@milton.ca](mailto:Glen.Cowan@milton.ca)>

**Subject:** RE: Town of Milton February 9, 2026 Council Meeting Item 7.6 ES-005-26\_MP4 West LOG Comments on the Draft 2025 DC Background Study

Hi Glen,

Thank you again for the meeting with the Group on Monday. In the interest of ensuring we are fully involved in the process, can you confirm that the questions we provided below constitute part of the formal consultation?

Additionally, I'd like to opportunity to discuss a bit more about the Town's position on the potential to extend the DC By-law.

You highlighted Section 9 of the DC Act as the reasoning; however, it is my understanding that Bill 185 amended the DC Act in 2024 such that the existing 5-year expiration can be extended. Town Council, pursuant to the changes enacted by Bill 185, can delete the expiration provision of the current DC By-law, which would provide additional time (up to 5 additional years) for the Town to undertake any and all necessary consultation with the development community and public, prior to the enactment of a new DC By-law.

I am available from now till the end of the day if you are able to call.

Thank you,

**Ore Alade, BES**  
**Project Manager III**



**DELTAURBAN**  
EXPERTS IN LAND DEVELOPMENT SERVICES

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**From:** [Glen.Cowan@milton.ca](mailto:Glen.Cowan@milton.ca) <[Glen.Cowan@milton.ca](mailto:Glen.Cowan@milton.ca)>

**Sent:** February 26, 2026 3:02 PM

**To:** Ore Alade <[orea@deltaurban.com](mailto:orea@deltaurban.com)>

**Cc:** [DevelopmentFinance@milton.ca](mailto:DevelopmentFinance@milton.ca); [Jill.Hogan@milton.ca](mailto:Jill.Hogan@milton.ca); [melanie.wallhouse@milton.ca](mailto:melanie.wallhouse@milton.ca)

**Subject:** RE: Town of Milton February 9, 2026 Council Meeting Item 7.6 ES-005-26\_MP4 West LOG Comments on the Draft 2025 DC Background Study

Good afternoon Ore,



April 6, 2026

Mayor Gordon Krantz and Members of Council  
Milton Town Hall  
150 Mary Street  
Milton, ON  
L9T 6Z5

RE: Town of Milton Development Charge Indexing – April 1, 2026

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Dear Mayor Krantz and Members of Council,

The Building Industry and Land Development Association (BILD) acknowledges the Town of Milton's upcoming annual indexing of Development Charges (DCs), scheduled to take effect on April 1<sup>st</sup>, 2026. On behalf of our members, we appreciate the opportunity to share our perspective on current market conditions and the ongoing housing challenges affecting development within the town's municipal boundaries.

With new home sales in 2026 continuing the trend from 2025 and remaining at historically low levels we remain at a fragile moment for our industry and the economy as a whole. In January 2026, the GTA saw 269 total new home sales with 184 Single Family sales, down 26% from the prior year, and 68% from the 10-year average. Apartment sales are down 50% from last year and down 89% from the 10-year average. In Halton Region, January Single Family New Home sales reached 65, 42% of sales in the same period in 2024. These figures highlight the significant pressures currently facing the housing market and reinforce the affordability challenges confronting prospective homebuyers alike.

Given these pressures, **BILD is formally requesting that the Town of Milton, along with municipalities and regions across the Greater Toronto Area planning to index development charges in 2026, forgo this year's indexation.** Even where indexing has already been approved to take effect, municipalities retain the ability to revisit that decision in the new year and remove the increase, pausing indexation would provide immediate, short-term relief and help support project viability under current market conditions.

While BILD recognizes the Town's authority to apply annual indexing, weakened consumer confidence, elevated construction and financing costs, and broader economic uncertainty are collectively impacting housing delivery across the GTA, including the Town of Milton. Taking this step would represent a tangible and timely action the Town can take to help stabilize the local development environment. Further, in light of recent announcements by the Federal and Provincial governments on DC funding, and as we wait for implementation guidance, we are requesting that you consider forgoing indexing at this time, and look to the direction provided by higher levels of government that development charges should be reduced to support housing development in the GTA.

We also acknowledge the Town is currently undertaking its 2026 Development Charges Review, and BILD will continue to work collaboratively with staff to ensure the outcome supports, rather than constrains, the timely delivery of housing.

Through our ongoing engagement with municipalities across the GTA, BILD has seen the value of proactive and collaborative approaches that respond to evolving market realities. We would welcome the opportunity to meet with the Mayor and Council to discuss the request further and explore additional options the Town could consider to support housing and long-

term growth. To work towards scheduling a meeting, please email Victoria Mortelliti, Director of Policy and Advocacy with BILD, at [vmortelliti@bildgta.ca](mailto:vmortelliti@bildgta.ca).

In conclusion, please accept our comments with respect and sincerity on behalf of the development industry, and we look forward to continuing to work in support of housing in the Town of Milton.

Sincerely,



Dave Wilkes  
BILD President & CEO

Cc: BILD Halton Forum Members  
Andrew Siltala, CAO  
Glen Cowan, CFO and Treasurer

## Melanie Wallhouse

---

**From:** Victoria Mortelliti <vmortelliti@bildgta.ca>  
**Sent:** April 6, 2026 11:34 AM  
**To:** Glen Cowan  
**Cc:** Melanie Wallhouse  
**Subject:** BILD Memo of Additional Comments - Milton DC  
**Attachments:** Memo - Milton DC Review - Additional Comments - File P1298 - April 6 2026.pdf

Hi Glen and Melanie,

I hope the long weekend has treated you well.

I have attached BILD's submission on the Milton DC Review in advance of our meeting tomorrow.

As well tomorrow I am hoping to hear if the Town has any thoughts on the recent Provincial/Federal DC announcements.

Many thanks always,

**Victoria Mortelliti, MCIP, RPP**  
Director, Policy and Advocacy  
647-405-2913



**Building Industry and Land Development Association**  
2005 Sheppard Avenue East | Suite 102 | Toronto, ON M2J 5B4  
bildgta.ca | renomark.ca | torontohomeshows.com

## MEMORANDUM

06 April 2026

**To:** Victoria Mortelliti  
BILD

**From:** Daryl Keleher, Principal  
KR Planning Group

**Re:** Milton DC Review – Additional Comments  
**Our File:** P1298

KR Planning Group was retained by was retained by BILD to review the Town of Milton’s development charge background study and proposed DC by-law.

### Additional Questions and Comments

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.

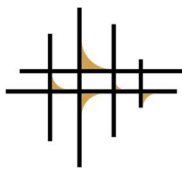
Figure 1

#### 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<br>(Public Sector - GTA) | Square Footage | 2025 Altus Cost Guide    |               | Assumed Cost | Estimated Cost | 50% of Range | Assumed Cost as % of Range |
|---------------------------------------|---|----------------|--------------------------|---------------|--------------|----------------|--------------|----------------------------|
|                                       |   |                | Low                      | High          |              |                |              |                            |
| <b>Town DC Study</b>                  |   |                |                          |               |              |                |              |                            |
| Whole Facility                        | Multi-Use Recreation Centres                            | 128,700        | \$ 670                   | \$ 1,160      | \$ 830       | \$ 106,821,000 | \$ 915       | 33%                        |
| <b>Revised Using 2021 Methodology</b> |   |                |                          |               |              |                |              |                            |
| 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  |              |                            |
|                                       |   |                | REVISSED 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.

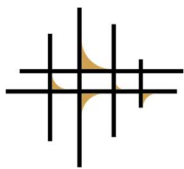
- The Transit BTE of 18.5% is meant to reflect the existing community’s share of benefit from an existing transit system where “less than half of the number of service hours per capita compared to municipalities of similar population size, geography and travel patterns.”, and the existing transit mode 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%?*

*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 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?*

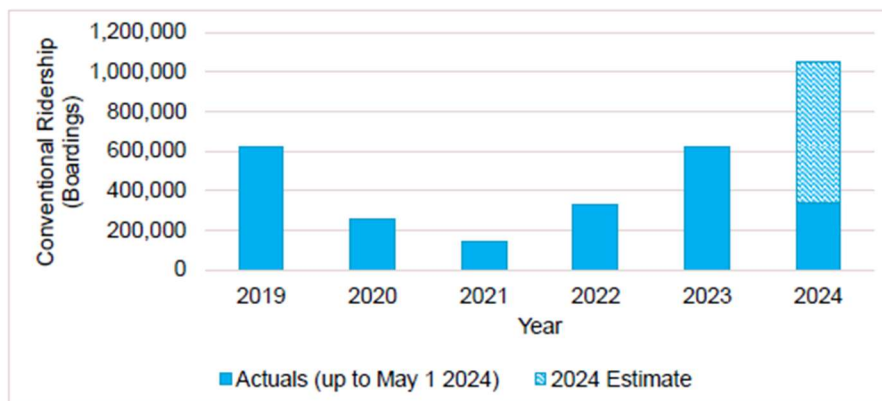


The estimate of 1.4 million boardings is significantly higher than the roughly 1,050,000 conventional transit boardings estimated for 2024, and roughly 2.5-times higher than the 600,000 boardings recorded for 2023, or any year with 'actuals' data over the 2019-2023 period.

*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 Staff Report CORS-005-25 (dated March 17, 2025)<sup>1</sup> provides data on the Town's 2024 boardings, and there were 1,072,922 revenue passenger trips in 2024, and 1,211,510 boardings.

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

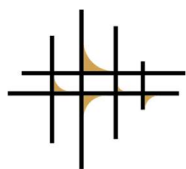
3. The proportion of land assumed to be conveyed to the Town is at risk of being significantly understated in several cases thereby overstating the DC rate necessary to fund future land acquisition costs.

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

*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?*

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.
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."

<sup>1</sup> <https://pub-milton.escribemeetings.com/filestream.ashx?DocumentId=11363>



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.

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.

April 15<sup>th</sup>, 2026  
*Sent Via Email*

Glen Cowan, Chief Financial Officer & Treasurer  
Town of Milton  
150 Mary Street  
Milton, ON L9T 6Z5

Dear Mr. Cowan:

**RE: Town of Milton Draft 2025 Development Charges Background Study Review – Additional Comments  
Milton Phase 4 (West) Landowners Group Inc. - Comments**

---

We are writing to you as the Group Manager for the Milton Phase 4 (West) Landowners Group Inc. (the “Group”). The Group is comprised of registered landowners within the Britannia Secondary Plan in the Town of Milton.

Further to our submissions dated February 6<sup>th</sup>, 26<sup>th</sup> and March 4<sup>th</sup> to staff and council (attached as **Schedule A**) we are providing additional comments based on the review of the Town’s Addendum reports to the DC Background Study (“DCBS”). The below comments are summarized based on a review by the Group’s consultant Urban Metrics Inc.

### **Optional Service Level Changes**

Addendum 1 of the DCBS further includes a number of items that may either be removed from the development charge or reduce the charge by applying a post period benefit factor – these items are identified as “Optional Service Level Changes”. Most of these optional items relate to projects which are long term in nature and not based on a detailed understanding of need. It is also highly likely that these items will not be required until after this proposed by-law has expired which would be in 2036, unless it is replaced at an earlier date. The implementation of these optional changes would represent a decrease in the proposed change for single detached units from \$39,181 to \$34,219 – a decrease of \$4,962 per unit.

### **Trafalgar & Britannia Population**

Table ES-2 of the DCBS identifies the growth within the Trafalgar Secondary Plan area being a population of 39,536 and 12,680 units which differs from the approved Trafalgar Tertiary Plan which is based on a population of 45,000. The Town’s response to this item as raised by David Schaeffer Engineering Ltd. noted that the population is derived from the 2024 Housing and Non-Residential Needs Analysis Report.

It is unclear why the Town does not utilize the actual approved population projections for the Trafalgar Secondary Plan area, particularly considering the Parks and Recreation Services were determined based on the full 45,000 persons assumed in the Tertiary Plan.

If the 2051 Milton population were increased to account for the full Trafalgar Tertiary Plan population, then the SDU DC for Town-Wide services would decrease by approximately \$758 per unit. Alternatively, if the post-period benefit were implemented to account for the lower Trafalgar population, then the Trafalgar /Agerton facilities identified in the DCBS should be reduced by approximately 10%, resulting in a decrease of approximately \$450 per unit.

Similarly, the Britannia population identified in the DCBS should be increased from 54,588 to the 57,500 as approved by the Britannia Secondary Plan.

### Service Level Caps

The Group remains concerned with the Service Level Caps used in the DCBS; particularly as they relate to the cost per square foot used to value existing recreational facilities. Construction costs have increased since the 2021 DCBS (per the Altus Cost Guide); however, in our opinion, the cost increases reflected in the DCBS are not reasonable nor do they reflect the magnitude of increased presented in the Altus Cost Guide – see the below breakdown:

|  | DCBS<br>(Addendum)      | Altus Cost<br>Guide     | DCBS<br>(Add. Opt.)     |
|--|-------------------------|-------------------------|-------------------------|
| 2021-2025 %increase in construction costs  | 218% <sup>1</sup>       | 52%-113% <sup>2</sup>   |                         |
| Indoor Recreation Facilities service level cap (calc. by inflating 2021 DCBS values) | \$1,121 MM <sup>3</sup> | \$715 MM                |                         |
| Total Parks & Recreation service level cap   | \$1,600 MM <sup>4</sup> | \$1,194 MM <sup>5</sup> |                         |
| D.C. recoverable amount (capped)   | \$1,345 MM <sup>6</sup> | \$1,194 MM              | \$1,078 MM <sup>7</sup> |
| Single-Family DC (Parks & Rec.)  | \$20,328 <sup>8</sup>   | \$18,045 <sup>9</sup>   | \$16,286 <sup>10</sup>  |

1. Weighted average increase in construction costs, based on total service level cap calculated using 2025 DCBS values/sq.ft. compared to 2021 DCBS values/sq.ft.

2. Based on different categories: Ice Arenas increased 53%, Community Aquatic Facility 52%, and Multi-Use Recreation Centre 113%.

3. "Eligible Amount" on page B-23 of DCBS Addendum.

4. Page 3/PDF page 6 of DCBS Addendum.

5. Calculated as \$1,600 - (\$1,121 - \$715).

6. Table 5-7, Page 5-29/PDF page 49 of DCBS Addendum.

7. Page 8/PDF page 11 of DCBS Addendum.

8. Table 2-1, Page 6/PDF page 9 of DCBS Addendum.

9. Calculated from ratio of D.C. recoverable amounts:  $(\$1,194/\$1,345) * \$20,328$

10. Page 8/PDF page 11 of DCBS Addendum.

Further, the Group has concerns regarding the service levels used to value existing recreational facilities which are based on an evaluation of new facilities i.e. the Whitby Fieldgate Sports Complex. Considering the increase in quality of the newer facilities, it is not suitable to value the construction costs of existing facilities comparatively.

Similar concerns have been raised regarding the service level values of park development and park amenities and trails, along with the average cost increases for library buildings of approximately 154% between the 2021 and 2025 DCBS.

### **Studies**

The Town's interpretation of Section 7(3) of the DC Act which states "(3) For greater certainty, a development charge by-law may provide for a class consisting of studies in respect of any service listed in subsection 2 (4) whose capital costs are described in paragraphs 5 and 6 of subsection 5 (3)" is liberal and encompasses studies which may arguably be interpreted as eligible services, including:

- Corporate Strategic Plans every four years;
- Official Plan Review
- Res/Non-Res Take Up Land Needs Study
- Commercial Needs Assessment
- "Special Financial Studies" every 5 years
- Studies for eligible services not included in the charge (e.g. POA).

The DCBS further does not include a service level calculation with respect to the studies which can be calculated by estimating the average annual cost for eligible studies. The Town's response when this issue was raised previously is that studies do not contribute to the level of service being provided by a municipality in the same manner that infrastructure assets do and that their non-inclusion in a DCBS is common practice. Our opinion is that the requirements of the *Development Charges Act* should be followed.

### **Conclusion**

On behalf of the Group, we are grateful for the opportunity to submit these comments and are appreciative of your time and review of the above comments. We will continue to work with the Town and its consultants to resolve our concerns ahead of a By-law being brought forward to Council, targeted for May 11<sup>th</sup>, 2026.

Yours Very Truly,



Ore Alade, B.E.S., Project Manager  
Delta Urban Inc.

*Attachments:      Schedule A – Previous Group Submissions  
                                 Submission Letter Dated February 6<sup>th</sup>, 2026  
                                 Comments Submissions Dated February 26<sup>th</sup> and March 4<sup>th</sup>, 2026*

*CC:      Jill Hogan, Director, Planning Policy and Urban Design, Town of Milton  
            Melanie Wallhouse, Manager, Development Finance and Financial Consulting  
            Milton Phase 4 (West) Landowners Group Inc.*

**Schedule A**  
Submission Letter Dated February 6<sup>th</sup>, 2026  
Comments Submissions Dated February 26<sup>th</sup> and March 4<sup>th</sup>, 2026

February 6<sup>th</sup>, 2026  
*Sent Via Email*

Mayor Krantz and Members of Council  
Town of Milton  
150 Mary Street  
Milton, ON L9T 6Z5

Dear Mayor Krantz and Members of Council:

**RE: Town of Milton Draft 2025 Development Charges Background Study – February 9, 2026  
Council Meeting  
Report No. ES-005-26  
Milton Phase 4 (West) Landowners Group Inc. - Comments**

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We are writing to you as the Group Manager for the Milton Phase 4 (West) Landowners Group Inc. (the “Group”). The Group is comprised of registered landowners within the Britannia Secondary Plan in the Town of Milton, as illustrated in the attached mapping (**Schedule A**) and in the enclosed Registered Landowners Summary Table (**Schedule B**).

This letter contains the Group’s preliminary comments on the Town of Milton’s draft 2025 Development Charges (DC) Background Study, prepared by Watson & Associates, dated December 2025. The Town held two Engagement Sessions for the DC Background Study on December 1, 2025, and January 27, 2026, wherein the methodology and key aspects of the DC Background Study were presented and an opportunity for dialogue amongst attendees was provided. As part of the next steps, the Town of Milton has scheduled a Statutory Public Meeting for the DC Background Study on February 9<sup>th</sup>, 2026, and requested public feedback on the DC Background Study and Draft DC By-laws by March 6<sup>th</sup>, 2026. The below are the Group’s comments:

### General Comments

**Comment 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.

### Services Related to a Highway Comments

**Comment 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 4<sup>th</sup> Line.

**Comment 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.

**Comment 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 5<sup>th</sup> Line to 6<sup>th</sup> Line and the EA for the LSL extension from 5<sup>th</sup> 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.

**Comment 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 Reginal Road, additional capacity requirements for the Britannia Secondary Plan area will be assessed and confirmed as part of the supporting Road Needs Analysis.

## Transit Services

### **Comment 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.

## Parks and Recreation Services

### **Comment 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.

### **Comment 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.

On behalf of the Group, we are grateful for your time and review of the above preliminary comments. We will continue to work with the Town and its consultants to provide more detailed comments regarding the DC Background Study and request that Milton Council defer approval of the proposed DC Background Study and implementing By-law until such time as the Milton Phase 4 Landowners Group has had the opportunity to meet and discuss its comments with Town staff and more meaningful engagement with the public has occurred. Should you have any further questions, please do not hesitate to contact the undersigned.

Yours Very Truly,



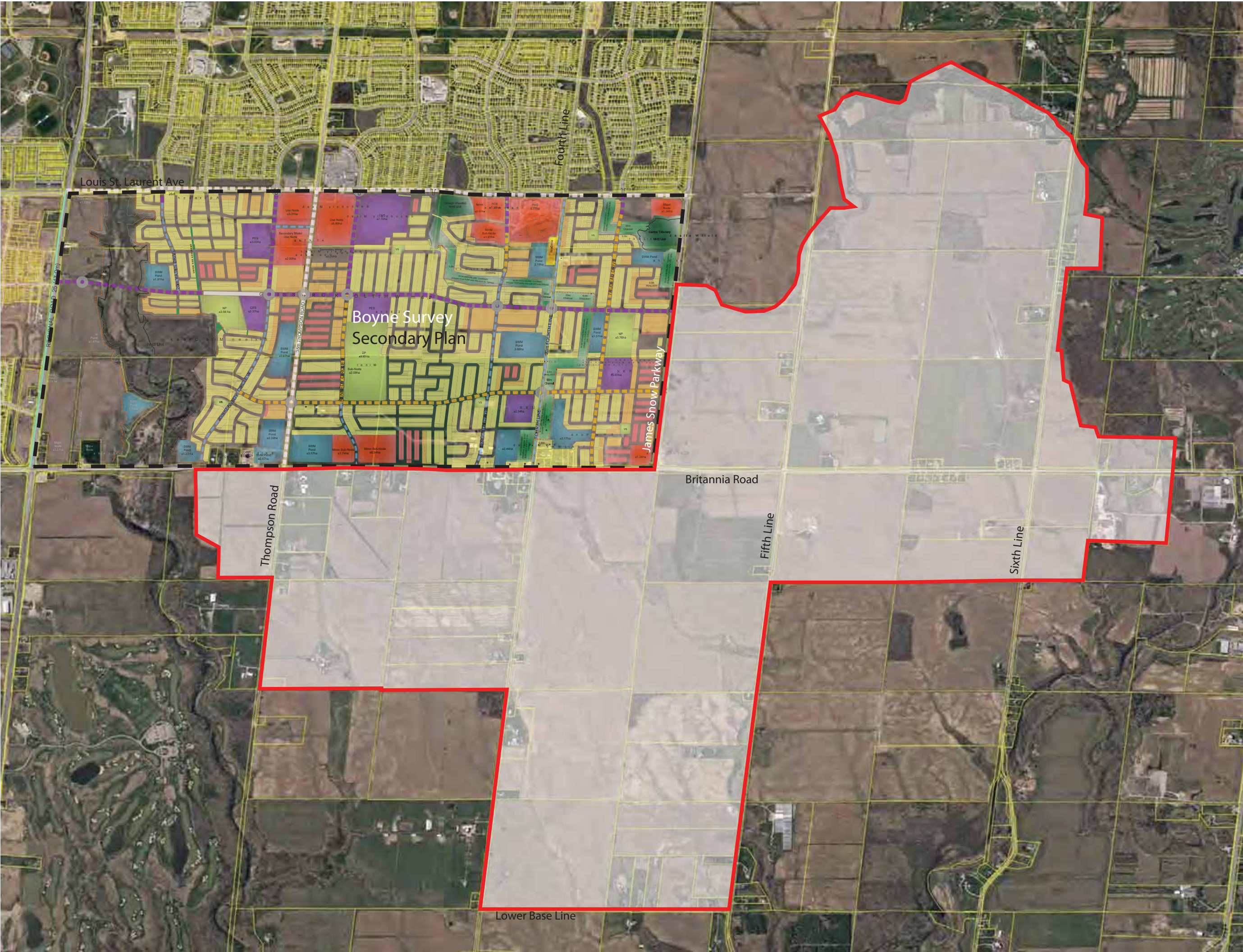
Ore Alade, B.E.S., Project Manager  
Delta Urban Inc.

*Attachments:      Schedule A – Milton Phase 4 (West) Landowners Group Inc. Ownership Map  
Schedule B – Milton Phase 4 (West) Landowners Group Inc. Registered  
Landowners Summary Table  
Schedule C – Pages 5-8, 5-13, 5-23, and 5-28 from the Town of Milton's Draft  
2025 Development Charges Background Study  
Schedule D – Page D-28 from Halton Region's 2022 Development Charges  
Background Study*

*CC:      Jill Hogan, Director, Planning Policy and Urban Design, Town of Milton  
Melanie Wallhouse, Manager, Development Finance and Financial Consulting  
Milton Phase 4 (West) Landowners Group Inc.*

**Schedule A**  
Milton Phase 4 (West) Landowners Group Inc Ownership Map

# MP4 West Landowners Map

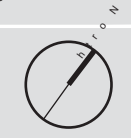


- Legend**
- Secondary Plan Boundary
  - Boyne Survey Boundary

Note:  
 Orianna Glen Homes Corp Britannia By-Pass Lands is owned by Trinison but under contract to Mattamy Homes.  
 Parcel data based on Savanta Ownership Map, last updated April 2019 & information provided by DeltaUrban January 6, 2023

DATE: November 22, 2023

SCALE: Not to Scale



Data Source: First Base Solutions Aerial Flown 2017

**Schedule B**  
Milton Phase 4 (West) Landowners Group Inc. Registered Landowners Summary Table

| <b>MP4 (West) Landowners Group Inc. - Legal Entities</b>  |  |
|---|--|
| <b>Entities</b>   | <b>Common Name</b>   |
| Argo Developments (5th Line) Ltd.   | Argo Development Corp.   |
| Mil Con Four Britannia Developments Limited<br>Mil Con Four Thompson Developments Limited   | Fieldgate Developments<br>Fieldgate Developments   |
| Milton Britannia Development Corp.<br>Milton Fifth Line Development Corp.<br>Fifth Line (5368) Milton Development Corp.   | State Building Corp<br>State Building Corp<br>State Building Corp  |
| Laurier Brown Milton East Developments Inc.<br>Cedar Brown South Milton Inc.  | Cedar City Developments<br>Cedar City Developments   |
| Mattamy (Milton West) Limited<br>Britannia Farms Inc.<br>Fifth Line Farming Limited<br>Mattamy (Milton East) Limited  | Mattamy Homes<br>Mattamy Homes<br>Mattamy Homes<br>Mattamy Homes   |
| Venturon Development (Milton) Inc.<br>Venturon Development (Milton 46) Inc.<br>Venturon Development (Milton 90) Inc.<br>12300 Brit Holdings Ltd.                                    | National Homes<br>National Homes<br>National Homes<br>National Homes   |
| Neamsby Investments Inc.<br>Cedarland Construction Inc.   | The Remington Group<br>The Remington Group   |
| Albanella Development Ltd.<br>Orianna Glen Homes Corp.<br>Sempronia Estates Inc.<br>Trebiano Trail Developments Ltd.<br>Neutrino Developments Inc.<br>Casape Developments (BT) Inc. | Trinison Management Corp.<br>Trinison Management Corp.<br>Trinison Management Corp.<br>Trinison Management Corp.<br>Trinison Management Corp.<br>Trinison Management Corp. |
| Milton Ex--EE Land Limited  | Tom Tsampiris  |
| Britannia Sixth Line Holdings Limited   | Medallion Corporation  |
| Branthaven Fifth Line Inc.<br>Branthaven Sixth Line Inc.  | Branthaven Development<br>Branthaven Development   |
| NDB Milton Developments Inc.<br>NDB Fourth Line Developments Inc.   | Stanford Homes<br>Stanford Homes   |
| Martino (Milton) Limited  | D'Orazio Group of Companies  |
| Tahlequa Holdings Inc.<br>Codroy Developments Inc.  | Townwood Homes<br>Townwood Homes   |
|   |  |

**Schedule C**  
Pages 5-8, 5-13, 5-23, and 5-28 and 5-33 from the  
Town of Milton's Draft 2025 Development Charges Background Study



Table 5-2  
Infrastructure Cost Included in the Development Charges Calculation  
Transit Services

| Proj. No. | Increased Service Needs Attributable to Anticipated Development | Timing (year) | Gross Capital Cost Estimate (2025\$) | Post Period Benefit | Other Deductions | Net Capital Cost   | Less:                           |   | Potential D.C. Recoverable Cost |                   |                       |
|-----------|---|---------------|--------------------------------------|---------------------|------------------|--------------------|---------------------------------|---|---------------------------------|-------------------|-----------------------|
|           |   |               |                                      |                     |                  |                    | Benefit to Existing Development | Grants, Subsidies and Other Contributions Attributable to New Development | Total                           | Residential Share | Non-Residential Share |
|           | 2025 to 2034  |               |                                      |                     |                  |                    |                                 |   |                                 | 79%               | 21%                   |
|           | <b>Vehicles &amp; Equipment:</b>                                |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
| 1         | Fixed Route Buses (Diesel) (42)                                 | 2025-2034     | 45,822,000                           | 15,519,910          |                  | 30,302,090         | 8,481,700                       |   | 21,820,390                      | 17,238,108        | 4,582,282             |
| 2         | Fixed Route Buses (Electric) (13)                               | 2025-2034     | 26,390,000                           | 8,938,290           |                  | 17,451,710         | 4,884,800                       |   | 12,566,910                      | 9,927,859         | 2,639,051             |
| 3         | Commingled Transit Vehicles (6 metre minibuses; gasoline) (5)   | 2025-2034     | 1,305,000                            | -                   |                  | 1,305,000          | 149,800                         |   | 1,155,200                       | 912,608           | 242,592               |
| 4         | Commingled Transit Vehicles (6 metre minibuses; electric) (4)   | 2025-2034     | 1,628,000                            | -                   |                  | 1,628,000          | 186,900                         |   | 1,441,100                       | 1,138,469         | 302,631               |
| 5         | Maintenance Vehicle (1)   | 2025-2034     | 107,000                              | 31,150              |                  | 75,850             | 18,750                          |   | 57,100                          | 45,109            | 11,991                |
| 6         | Supervisor Vehicle (3)  | 2025-2034     | 264,000                              | 76,850              |                  | 187,150            | 46,250                          |   | 140,900                         | 111,311           | 29,589                |
|           | <b>Terminals &amp; Bus Stops:</b>                               |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
| 7         | MEV Terminal  | 2025-2034     | 2,525,000                            | 1,262,500           |                  | 1,262,500          | -                               |   | 1,262,500                       | 997,375           | 265,125               |
| 8         | Kennedy Circle Terminal   | 2025-2034     | 515,000                              | -                   |                  | 515,000            | -                               |   | 515,000                         | 406,850           | 108,150               |
| 9         | Britannia Terminal  | 2025-2034     | 2,525,000                            | 987,280             |                  | 1,537,720          | 1,300                           |   | 1,536,420                       | 1,213,772         | 322,648               |
| 10        | Bus Stops   | 2025-2034     | 164,000                              | 55,550              |                  | 108,450            | 30,360                          |   | 78,090                          | 61,691            | 16,399                |
|           | <b>Facilities:</b>  |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
| 11        | Maintenance and Operations Facility*                            | 2025-2034     | 85,990,000                           | 27,637,190          |                  | 58,352,810         | 10,439,190                      |   | 47,913,620                      | 37,851,760        | 10,061,860            |
| 12        | Reserve Fund Adjustment   |               | 20,715,916                           |                     |                  | 20,715,916         |                                 |   | 20,715,916                      | 14,460,169        | 6,255,748             |
|           |   |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
|           |   |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
|           |   |               |                                      |                     |                  |                    |                                 |   |                                 |                   |                       |
|           | <b>Total</b>  |               | <b>187,950,916</b>                   | <b>54,508,720</b>   | <b>-</b>         | <b>133,442,196</b> | <b>24,239,050</b>               | <b>-</b>  | <b>109,203,146</b>              | <b>84,365,080</b> | <b>24,838,066</b>     |

\*Gross Cost is net of grant funding and of amount included in Town's work in progress. This amount is reflected in the reserve fund adjustment.



Table 5-4  
 Infrastructure Cost Included in the Development Charges Calculation  
 Services Related to a Highway - Roads

| Proj. No. | Increased Service Needs Attributable to Anticipated Development<br><br>2025 to Buildout      | Timing (year) | Gross Capital Cost Estimate (2025\$) | Post Period Benefit | Other Deductions | Net Capital Cost | Less:                           |   | Potential D.C. Recoverable Cost |                              |                                  |
|-----------|--|---------------|--------------------------------------|---------------------|------------------|------------------|---------------------------------|---|---------------------------------|------------------------------|----------------------------------|
|           |  |               |                                      |                     |                  |                  | Benefit to Existing Development | Grants, Subsidies and Other Contributions Attributable to New Development | Total                           | Residential Share<br><br>77% | Non-Residential Share<br><br>23% |
| 1         | Gateway Features   | 2036-2051     | 394,050                              | -                   |                  | 394,050          | -                               |   | 394,050                         | 303,419                      | 90,632                           |
| 2         | Main Street Extension (Fifth Line to Sixth Line) (4 lane)                                    | 2027          | 24,180,000                           | -                   |                  | 24,180,000       | -                               |   | 24,180,000                      | 18,618,600                   | 5,561,400                        |
| 3         | Main Street Extension (6th Line to Trafalgar) (4 lane)                                       | 2036-2051     | 25,910,000                           | -                   |                  | 25,910,000       | -                               |   | 25,910,000                      | 19,950,700                   | 5,959,300                        |
| 4         | 5th Line Widening (Derry Road to Britannia) (4 lane)   | 2026          | 45,928,000                           | -                   |                  | 45,928,000       | 6,889,200                       |   | 39,038,800                      | 30,059,876                   | 8,978,924                        |
| 5         | 5th Line Widening (Britannia Road to Lower Base Line) (4 lane)                               | 2045-2050     | 29,617,000                           | -                   |                  | 29,617,000       | 4,442,600                       |   | 25,174,400                      | 19,384,288                   | 5,790,112                        |
| 6         | Fifth Line Intersections (Louis St Laurent to Britannia Rd)                                  | 2030-2031     | 3,845,000                            | -                   |                  | 3,845,000        | -                               |   | 3,845,000                       | 2,960,650                    | 884,350                          |
| 7         | 5th Line (Main Street E to Yukon Court)  | 2029-2030     | 9,478,000                            | -                   |                  | 9,478,000        | -                               |   | 9,478,000                       | 7,298,060                    | 2,179,940                        |
| 8         | 6th Line (Hwy 401 to Derry Road) (4 lane)  | 2027-2030     | 37,902,000                           | -                   |                  | 37,902,000       | 5,685,300                       |   | 32,216,700                      | 24,806,859                   | 7,409,841                        |
| 9         | 6th Line Widening (Derry Road to Britannia Road) (4 lane)                                    | 2029-2032     | 37,687,000                           | -                   |                  | 37,687,000       | 5,653,100                       |   | 32,033,900                      | 24,666,103                   | 7,367,797                        |
| 10        | 6th Line Urbanization (Britannia to Lower Base Line) (structure)                             | 2045-2049     | 4,169,000                            | -                   |                  | 4,169,000        | 625,400                         |   | 3,543,600                       | 2,728,572                    | 815,028                          |
| 11        | 6th Line Widening (Britannia to Lower Base Line) (4 lane)                                    | 2045-2049     | 30,472,000                           | -                   |                  | 30,472,000       | 4,570,800                       |   | 25,901,200                      | 19,943,924                   | 5,957,276                        |
| 12        | Louis St. Laurent Extension (5th Line to 6th Line) (4 lane)                                  | 2027-2029     | 21,407,000                           | -                   |                  | 21,407,000       | -                               |   | 21,407,000                      | 16,483,390                   | 4,923,610                        |
| 13        | Louis St. Laurent Extension (Fifth Line to Trafalgar) - EA                                   | 2026          | 1,078,000                            | -                   |                  | 1,078,000        | -                               |   | 1,078,000                       | 830,060                      | 247,940                          |
| 14        | New Traffic Signals  | 2026-2051     | 10,556,000                           | -                   |                  | 10,556,000       | 1,055,600                       |   | 9,500,400                       | 7,315,308                    | 2,185,092                        |
| 15        | Preemption Traffic Control System  | 2026-2051     | 1,302,950                            | -                   |                  | 1,302,950        | 130,300                         |   | 1,172,650                       | 902,941                      | 269,710                          |
| 16        | Main Street (Trafalgar to west of Hwy 407) (4 lane)  | 2045-2049     | 30,270,000                           | -                   |                  | 30,270,000       | -                               |   | 30,270,000                      | 23,307,900                   | 6,962,100                        |
| 17        | Roadway Restriping (Associated with Newly Constructed Roads)                                 | 2030-2034     | 449,000                              | -                   |                  | 449,000          | -                               |   | 449,000                         | 345,730                      | 103,270                          |
| 18        | Louis St. Laurent Extension (6th Line to Trafalgar) (Bridge)                                 | 2041-2043     | 20,207,000                           | -                   |                  | 20,207,000       | -                               |   | 20,207,000                      | 15,559,390                   | 4,647,610                        |
| 19        | Louis St. Laurent Extension (6th Line to Trafalgar) (4 lane)                                 | 2041-2043     | 17,302,000                           | -                   |                  | 17,302,000       | -                               |   | 17,302,000                      | 13,322,540                   | 3,979,460                        |
| 20        | Britannia Road (Tremaine Rd to MEV West Boundary) (4 lane)                                   | 2037-2039     | 5,092,000                            | -                   |                  | 5,092,000        | 763,800                         |   | 4,328,200                       | 3,332,714                    | 995,486                          |
| 21        | Lower Base Line (Fourth Line to Fifth Line) (2 lane extension)                               | 2039-2041     | 29,386,000                           | -                   |                  | 29,386,000       | -                               |   | 29,386,000                      | 22,627,220                   | 6,758,780                        |
| 22        | Lower Base Line (Fifth Line to Town East Boundary) (4 lanes)                                 | 2045-2050     | 56,645,000                           | -                   |                  | 56,645,000       | 8,496,800                       |   | 48,148,200                      | 37,074,114                   | 11,074,086                       |
| 23        | Main Street E MTSA South Side (Wilson Dr to Thompson Rd)                                     | 2036-2051     | 4,299,000                            | -                   |                  | 4,299,000        | 1,074,800                       |   | 3,224,200                       | 2,482,634                    | 741,566                          |
| 24        | Intersection Improvement Costs   | 2026-2028     | 3,401,000                            | -                   |                  | 3,401,000        | 340,100                         |   | 3,060,900                       | 2,356,893                    | 704,007                          |
| 25        | Lower Base Line - Tremaine to RR 25 - widening to 4 lanes;                                   | 2041-2046     | 37,371,000                           | -                   |                  | 37,371,000       | 5,605,700                       |   | 31,765,300                      | 24,459,281                   | 7,306,019                        |
| 26        | Lower Base Line - RR 25 to new JSP - widening to 4 lanes                                     | 2043-2048     | 61,213,000                           | -                   |                  | 61,213,000       | 5,509,200                       | 24,485,200  | 31,218,600                      | 24,038,322                   | 7,180,278                        |
| 28        | NW Arterial Britannia Secondary Plan (Louis St. Laurent to Secondary Plan Boundary) - 4 Lane | 2035+         | 10,900,000                           | -                   |                  | 10,900,000       | -                               |   | 10,900,000                      | 8,393,000                    | 2,507,000                        |
|           | <b>BRIDGES &amp; STRUCTURES</b>  |               |                                      |                     |                  |                  | -                               |   |                                 |                              |                                  |
| 29        | Main Street Crossing (Trafalgar to 407)  | 2045-2049     | 18,909,000                           | -                   |                  | 18,909,000       | -                               |   | 18,909,000                      | 14,559,930                   | 4,349,070                        |
| 30        | 16 Mile Creek Crossing   | 2030          | 3,576,000                            | -                   |                  | 3,576,000        | -                               |   | 3,576,000                       | 2,753,520                    | 822,480                          |
|           | <b>ACTIVE TRANSPORTATION:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                              |                                  |
| 31        | Derry Green Union Gas Pipeline Easement (Asphalt trails and 2 pedestrian bridges)            | 2029          | 1,899,000                            | -                   |                  | 1,899,000        | -                               |   | 1,899,000                       | 1,462,230                    | 436,770                          |



Table 5-7  
Infrastructure Cost Included in the Development Charges Calculation  
Parks and Recreation Services

| Proj. No.    | Increased Service Needs Attributable to Anticipated Development                          | Timing (year) | Gross Capital Cost Estimate (2025\$) | Post Period Benefit | Other Deductions | Net Capital Cost | Less:                           |   | Potential D.C. Recoverable Cost |                   |                       |
|--------------|--|---------------|--------------------------------------|---------------------|------------------|------------------|---------------------------------|---|---------------------------------|-------------------|-----------------------|
|              |  |               |                                      |                     |                  |                  | Benefit to Existing Development | Grants, Subsidies and Other Contributions Attributable to New Development | Total                           | Residential Share | Non-Residential Share |
| 2025 to 2051 |  |               |                                      |                     |                  |                  |                                 |   | 95%                             | 5%                |                       |
|              | <b>Recreation Facilities</b>   |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 1            | Boyne Community Centre (Arena (2) Ice pads, Indoor Pool, Gymnasium, Multi-Purpose Space) | 2028-2030     | 141,570,000                          | -                   |                  | 141,570,000      | -                               |   | 141,570,000                     | 134,491,500       | 7,078,500             |
|              | <b>Britannia:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 2            | Arena - Twin Pad   | 2035+         | 84,700,000                           | -                   |                  | 84,700,000       | -                               |   | 84,700,000                      | 80,465,000        | 4,235,000             |
| 3            | Indoor Pool  | 2035+         | 67,760,000                           | -                   |                  | 67,760,000       | -                               |   | 67,760,000                      | 64,372,000        | 3,388,000             |
| 4            | Gymnasium  | 2035+         | 31,460,000                           | -                   |                  | 31,460,000       | -                               |   | 31,460,000                      | 29,887,000        | 1,573,000             |
| 5            | Multi-purpose Spaces   | 2035+         | 7,260,000                            | -                   |                  | 7,260,000        | -                               |   | 7,260,000                       | 6,897,000         | 363,000               |
|              | <b>Trafalgar/Agerton:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 6            | Arena - Twin Pad   | 2035+         | 84,700,000                           | -                   |                  | 84,700,000       | -                               |   | 84,700,000                      | 80,465,000        | 4,235,000             |
| 7            | Indoor Pool  | 2035+         | 33,880,000                           | -                   |                  | 33,880,000       | -                               |   | 33,880,000                      | 32,186,000        | 1,694,000             |
| 8            | Gymnasium  | 2035+         | 15,730,000                           | -                   |                  | 15,730,000       | -                               |   | 15,730,000                      | 14,943,500        | 786,500               |
| 9            | Multi-purpose Spaces   | 2035+         | 7,260,000                            | -                   |                  | 7,260,000        | -                               |   | 7,260,000                       | 6,897,000         | 363,000               |
|              | <b>MEV:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 10           | Arena - Twin Pad   | 2035+         | 84,700,000                           | -                   |                  | 84,700,000       | -                               |   | 84,700,000                      | 80,465,000        | 4,235,000             |
| 11           | Indoor Pool  | 2035+         | 33,880,000                           | -                   |                  | 33,880,000       | -                               |   | 33,880,000                      | 32,186,000        | 1,694,000             |
| 12           | Gymnasium  | 2035+         | 31,460,000                           | -                   |                  | 31,460,000       | -                               |   | 31,460,000                      | 29,887,000        | 1,573,000             |
| 13           | Multi-Purpose Spaces   | 2035+         | 7,260,000                            | -                   |                  | 7,260,000        | -                               |   | 7,260,000                       | 6,897,000         | 363,000               |
|              | <b>Intensification:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 14           | Arena - Twin Pad   | 2035+         | 84,700,000                           | -                   |                  | 84,700,000       | -                               |   | 84,700,000                      | 80,465,000        | 4,235,000             |
| 15           | Indoor Pool  | 2035+         | 33,880,000                           | -                   |                  | 33,880,000       | -                               |   | 33,880,000                      | 32,186,000        | 1,694,000             |
| 16           | Gymnasium  | 2035+         | 31,460,000                           | -                   |                  | 31,460,000       | -                               |   | 31,460,000                      | 29,887,000        | 1,573,000             |
| 17           | Multi-Purpose Spaces   | 2035+         | 7,260,000                            | -                   |                  | 7,260,000        | -                               |   | 7,260,000                       | 6,897,000         | 363,000               |
|              | <b>Community Expansion Area:</b>   |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 18           | Arena - Twin Pad   | 2035+         | 169,400,000                          | -                   |                  | 169,400,000      | -                               |   | 169,400,000                     | 160,930,000       | 8,470,000             |
| 19           | Indoor Pool  | 2035+         | 67,760,000                           | -                   |                  | 67,760,000       | -                               |   | 67,760,000                      | 64,372,000        | 3,388,000             |
| 20           | Gymnasium  | 2035+         | 31,460,000                           | -                   |                  | 31,460,000       | -                               |   | 31,460,000                      | 29,887,000        | 1,573,000             |
| 21           | Multi-purpose Spaces   | 2035+         | 14,520,000                           | -                   |                  | 14,520,000       | -                               |   | 14,520,000                      | 13,794,000        | 726,000               |
|              | <b>Parkland Development</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
|              | <b>Trails/Linear Parks:</b>  |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 22           | New Trail Development  | 2027          | 1,070,000                            | -                   |                  | 1,070,000        | -                               |   | 1,070,000                       | 1,016,500         | 53,500                |
| 23           | Linear Park Multi Use Trail - Coates South (4b)  | 2028          | 1,000,000                            | -                   |                  | 1,000,000        | -                               |   | 1,000,000                       | 950,000           | 50,000                |
| 24           | Milton Heights Tributary Trails  | 2027          | 1,550,000                            | -                   |                  | 1,550,000        | -                               |   | 1,550,000                       | 1,472,500         | 77,500                |



Table 5-7 (Cont'd)  
Infrastructure Cost Included in the Development Charges Calculation  
Parks and Recreation Services

| Proj. No.    | Increased Service Needs Attributable to Anticipated Development | Timing (year) | Gross Capital Cost Estimate (2025\$) | Post Period Benefit | Other Deductions | Net Capital Cost | Less:                           |   | Potential D.C. Recoverable Cost |                   |                       |
|--------------|---|---------------|--------------------------------------|---------------------|------------------|------------------|---------------------------------|---|---------------------------------|-------------------|-----------------------|
|              |   |               |                                      |                     |                  |                  | Benefit to Existing Development | Grants, Subsidies and Other Contributions Attributable to New Development | Total                           | Residential Share | Non-Residential Share |
| 2025 to 2051 |   |               |                                      |                     |                  |                  |                                 |   | 95%                             | 5%                |                       |
|              | <u>Parkland Amenities</u>                                       |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 122          | Playground Equipment - Village Square                           | 2035+         | 1,410,000                            | -                   |                  | 1,410,000        | -                               |   | 1,410,000                       | 1,339,500         | 70,500                |
| 123          | Shelter - Minor   | 2035+         | 840,000                              | -                   |                  | 840,000          | -                               |   | 840,000                         | 798,000           | 42,000                |
|              | <b>Community Expansion Area</b>                                 |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
|              | <u>Parkland Development</u>                                     |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 124          | Village Squares   | 2035+         | 7,540,000                            | -                   |                  | 7,540,000        | -                               |   | 7,540,000                       | 7,163,000         | 377,000               |
| 125          | Neighbourhood Parks   | 2035+         | 6,160,000                            | -                   |                  | 6,160,000        | -                               |   | 6,160,000                       | 5,852,000         | 308,000               |
| 126          | District Parks  | 2035+         | 9,860,000                            | -                   |                  | 9,860,000        | -                               |   | 9,860,000                       | 9,367,000         | 493,000               |
|              | <u>Parkland Amenities</u>                                       |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 127          | Playground Equipment - Village Square                           | 2035+         | 4,940,000                            | -                   |                  | 4,940,000        | -                               |   | 4,940,000                       | 4,693,000         | 247,000               |
| 128          | Playground Equipment - Neighbourhood Park                       | 2035+         | 1,010,000                            | -                   |                  | 1,010,000        | -                               |   | 1,010,000                       | 959,500           | 50,500                |
| 129          | Playground Equipment - District Park                            | 2035+         | 700,000                              | -                   |                  | 700,000          | -                               |   | 700,000                         | 665,000           | 35,000                |
| 130          | Hardball/Baseball - (lit)                                       | 2035+         | 1,080,000                            | -                   |                  | 1,080,000        | -                               |   | 1,080,000                       | 1,026,000         | 54,000                |
| 131          | Slo-Pitch/Softball - (lit)                                      | 2035+         | 700,000                              | -                   |                  | 700,000          | -                               |   | 700,000                         | 665,000           | 35,000                |
| 132          | Major Soccer Field - (lit)                                      | 2035+         | 12,460,000                           | -                   |                  | 12,460,000       | -                               |   | 12,460,000                      | 11,837,000        | 623,000               |
| 133          | Beach Volleyball - Lit  | 2035+         | 170,000                              | -                   |                  | 170,000          | -                               |   | 170,000                         | 161,500           | 8,500                 |
| 134          | Tennis Courts - Lit   | 2035+         | 380,000                              | -                   |                  | 380,000          | -                               |   | 380,000                         | 361,000           | 19,000                |
| 135          | Multi-Purpose Court - (lit)                                     | 2035+         | 300,000                              | -                   |                  | 300,000          | -                               |   | 300,000                         | 285,000           | 15,000                |
| 136          | Multi-use Half Court  | 2035+         | 200,000                              | -                   |                  | 200,000          | -                               |   | 200,000                         | 190,000           | 10,000                |
| 137          | Shelter - Major   | 2035+         | 480,000                              | -                   |                  | 480,000          | -                               |   | 480,000                         | 456,000           | 24,000                |
| 138          | Shelter - Minor   | 2035+         | 3,360,000                            | -                   |                  | 3,360,000        | -                               |   | 3,360,000                       | 3,192,000         | 168,000               |
| 139          | Skateboard Area - Minor   | 2035+         | 660,000                              | -                   |                  | 660,000          | -                               |   | 660,000                         | 627,000           | 33,000                |
| 140          | Spray Pad - Major   | 2035+         | 1,340,000                            | -                   |                  | 1,340,000        | -                               |   | 1,340,000                       | 1,273,000         | 67,000                |
| 141          | Spray Pad - Minor   | 2035+         | 1,080,000                            | -                   |                  | 1,080,000        | -                               |   | 1,080,000                       | 1,026,000         | 54,000                |
|              | <b>External to Secondary Plans</b>                              |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
|              | <u>Parkland Development</u>                                     |               |                                      |                     |                  |                  |                                 |   |                                 |                   |                       |
| 142          | District Parks  | 2035+         | 4,690,000                            | -                   |                  | 4,690,000        | -                               |   | 4,690,000                       | 4,455,500         | 234,500               |
| 143          | Community Parks   | 2035+         | 48,550,000                           | -                   |                  | 48,550,000       | -                               |   | 48,550,000                      | 46,122,500        | 2,427,500             |

**Schedule D**

Page D-28 from Halton Region's 2022 Development Charges Background Study

Halton Region  
2022 Development Charge Study  
Roads Capital Projects - Total (\$2022, \$000's)

Table D-11

| Unique ID | Description   | 2023  | 2024   | 2025   | 2026   | 2027   | Sub-total |           | Total<br>2023-2031 | Bynd 2031<br>(Ovrszng) | Non-Growth | Net Growth | Residential | Non Residential |
|-----------|---|-------|--------|--------|--------|--------|-----------|-----------|--------------------|------------------------|------------|------------|-------------|-----------------|
|           |   |       |        |        |        |        | 2023-2027 | 2028-2031 |                    |                        |            |            |             |                 |
| 7567      | Miscellaneous R.O.W. Purchases and Road Dedication Engineering & Surveys (REG)  | 100   | 100    | -      | -      | -      | 200       | -         | 200                | -                      | 200        | -          | -           | -               |
| 7853      | Traffic Signal Interconnect (REG)   | 150   | 150    | 150    | 150    | 150    | 750       | 600       | 1,350              | -                      | 1,350      | -          | -           | -               |
| 7854      | Operational Improvements (REG)  | 200   | 200    | 200    | 200    | 200    | 1,000     | 1,100     | 2,100              | -                      | 2,100      | -          | -           | -               |
| 2659      | Guelph Line - Widening from 4 to 6 lanes from Mainway to Upper Middle Road (BUR) (Reg. Rd. 1)   | 850   | -      | 2,498  | 9,562  | 17,198 | 30,128    | -         | 30,128             | -                      | 3,917      | 26,209     | 16,774      | 9,435           |
| 6806      | Guelph Line - Widening from 4 to 6 lanes from Upper Middle Road to Dundas Street (Regional Road 1) (BUR)  | -     | -      | -      | -      | 850    | 850       | 28,408    | 29,258             | 8,191                  | 2,317      | 18,748     | 11,999      | 6,749           |
| 3091      | Trafalgar Rd - Grade Separation at CN Crossing north of Maple Ave (HHS) (Regional Road 3)   | 70    | 32,994 | -      | -      | -      | 33,064    | -         | 33,064             | -                      | 4,298      | 28,766     | 18,410      | 10,356          |
| 5376      | Trafalgar Rd - Grade Separation at Metrolinx Crossing south of Hwy 7 (HHS) (Regional Road 3)  | 70    | 21,018 | -      | -      | -      | 21,088    | -         | 21,088             | -                      | 2,952      | 18,134     | 11,605      | 6,529           |
| 6823      | Trafalgar Road - Widening from 4 to 6 lanes from Highway 407 to Britannia Road (ML) (Regional Road 3)   | -     | 5,003  | 2,203  | 648    | 34,851 | 42,705    | -         | 42,705             | -                      | 4,270      | 38,435     | 24,598      | 13,837          |
| 6927      | Trafalgar Road - Widening from 4 to 6 lanes from Britannia Road to Steeles Avenue including Highway 401 Structure (ML) (Regional Road 3)              | -     | -      | -      | 9,164  | 5,030  | 14,194    | 66,847    | 81,041             | -                      | 6,483      | 74,558     | 47,717      | 26,841          |
| 7756      | Trafalgar Road Widening from 2 to 4 Lanes from 10 Side Road to Hwy 7 (HHS) (Regional Road 3)  | 234   | 60,419 | -      | -      | -      | 60,653    | -         | 60,653             | -                      | 12,737     | 47,916     | 30,666      | 17,250          |
| 5830      | James Snow Parkway - Widening from 4 to 6 lanes from Highway 401 to Britannia Road (ML) (Regional Road 4)   | -     | 3,918  | 23,663 | 30,428 | -      | 58,008    | -         | 58,008             | -                      | 4,060      | 53,948     | 34,524      | 19,421          |
| 6906      | James Snow Parkway - New 6 lane road from Highway 407 to Britannia Road (ML) (Regional Road 4)  | -     | 1,100  | -      | -      | 4,968  | 6,068     | 80,207    | 86,273             | 6,039                  | -          | 80,234     | 51,351      | 28,883          |
| 6907      | James Snow Parkway - Widening from 4 to 6 lanes from Highway 401 to Tremaine Road (ML) (Regional Road 4)  | 850   | -      | 9,515  | 31,598 | 1,179  | 43,142    | 67,396    | 110,538            | -                      | 3,316      | 107,222    | 68,621      | 38,601          |
| 7487      | Dundas Street - Widening from 4 to 6 lanes from Guelph Line to Halton/Hamilton Boundary, including improvements at Brant Street (BUR) Regional Road 5 | -     | 192    | 28,465 | -      | -      | 28,657    | -         | 28,657             | -                      | 9,456      | 19,201     | 12,289      | 6,912           |
| 6757      | "5 1/2 Line" - New 6 lane road from Britannia Road to Steeles Avenue & Interchange at Highway 401 (ML)  | 1,600 | -      | 11,031 | -      | 91,042 | 103,673   | 79,138    | 182,811            | 3,657                  | -          | 179,154    | 114,659     | 64,495          |
| 6804      | Derry Road - Widening from 4 to 6 lanes from Tremaine Road to Highway 407 (ML) (Regional Road 7)  | -     | -      | -      | 850    | -      | 850       | 131,360   | 132,210            | 6,611                  | 12,561     | 113,038    | 72,345      | 40,693          |

- 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

### **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

### **Increased Capital Costs**

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

### **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.
- 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.

## 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

## 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.
- 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
- 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
- 10) No level of Service calculation was undertaken for the acquisition of land
  - a. Please provide this calculation as required by the Act

**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?

**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.

April 15, 2026

Our File: 850127

Ms. Melanie Wallhouse  
Manager, Development Finance & Financial Consulting  
Town of Milton  
150 Mary Street  
Milton ON L9T 6Z5

Via: Email

**Re: 2026 Development Charges Background Study Comments**  
South Milton Landowners Group Inc.  
Town of Milton

Dear Ms. Wallhouse:

TerraJunction Consulting has been retained as the Group Technical Director for the South Milton Landowners Group (LOG). On behalf of the South Milton LOG, we appreciate the opportunity to provide comments on the Town of Milton's 2026 draft Development Charges (DC) Background Study, including Addendum 1 and Addendum 2.

We appreciate that the DC generally incorporates infrastructure required to support growth within the South Milton lands. In particular, we support the inclusion of 5<sup>th</sup> Line and 6<sup>th</sup> Line improvements (from Britannia Road to Lower Base Line), and Lower Base Line (Regional Road 25 to east Town limit).

It is our understanding that for these roads the Town has assumed only a portion of the required land will be provided under the provisions of the Planning Act, as follows:

- 5<sup>th</sup> Line (Britannia to Lower Base Line): 50% of the required land conveyed gratuitously under the provisions of the Planning Act, remaining 50% included in the DC
- 6<sup>th</sup> Line (Britannia to Lower Base Line): 25% of the required land conveyed gratuitously under the provisions of the Planning Act, remaining 75% included in the DC.
- Lower Base Line: 50% of the required land conveyed gratuitously under the provisions of the Planning Act, remaining 50% included in the DC.

Given these assumptions, can the Town confirm that DC reimbursement of land would be made to impacted owners on the basis of these assumptions, regardless of what would ultimately be conveyed through the provisions of the Planning Act? If not, are the above assumptions in line with historical trends of the percentage of lands required to be obtained outside of Planning Act provisions?

We note that the South Milton LOG supports the comments that have been made on behalf of the Building Industry and Land Development Association (BILD) dated January 30, 2026 and April 6, 2026. In particular, we emphasize their comment that the capital cost assumptions for new facilities (assumed at \$830/sf) should be reduced to \$538/sf to reflect the blended average methodology as used in previous DC background studies. We believe the cost of new facilities



used in the DC Study is overstated with the methodology proposed, and a change in methodology from previous Town DC studies is unjustified.

Thank you for the opportunity to provide comments, and we look forward to continued collaboration with the Town to refine the infrastructure required to support the South Milton lands as our development plans advance.

Sincerely,  
**TerraJunction Consulting**

**John Tjeerdsma, P.Eng.**  
Principal  
john.tjeerdsma@tjconsulting.com

c. South Milton Landowners Group



# Project Report

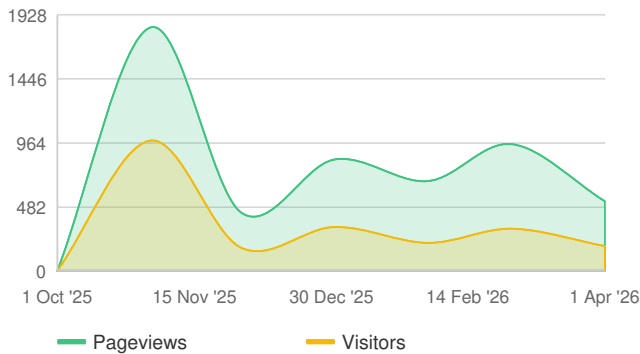
16 October 2018 - 19 April 2026

## Let's Talk Milton

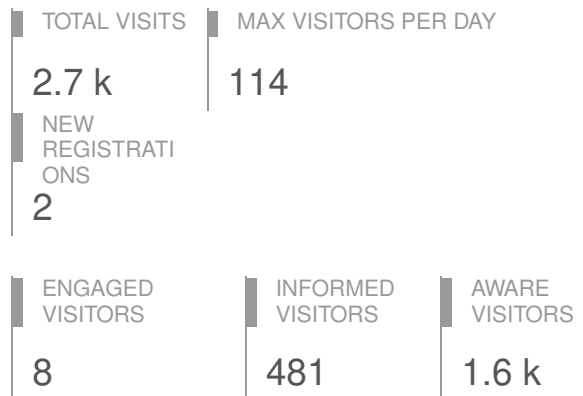
### Development Charges Background Study and Community Benefits Charges Strategy



#### Visitors Summary

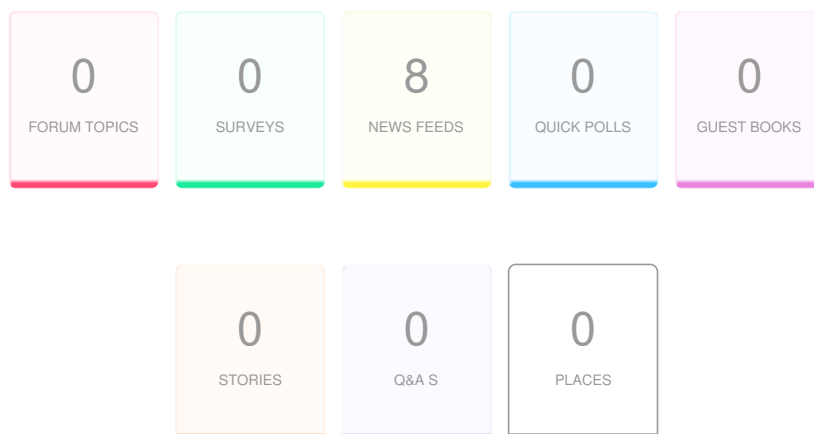


#### Highlights



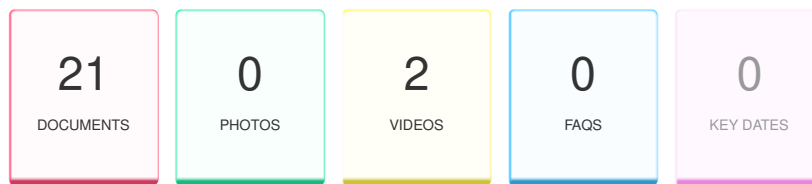
|                                 |              |                             |            |            |           |
|---------------------------------|--------------|-----------------------------|------------|------------|-----------|
| Aware Participants              | 1,586        | Engaged Participants        | 8          |            |           |
| Aware Actions Performed         | Participants | Engaged Actions Performed   | Registered | Unverified | Anonymous |
| Visited a Project or Tool Page  | 1,586        | Contributed on Forums       | 0          | 0          | 0         |
| Informed Participants           | 481          | Participated in Surveys     | 0          | 0          | 0         |
| Informed Actions Performed      | Participants | Contributed to Newsfeeds    | 0          | 0          | 0         |
| Viewed a video                  | 6            | Participated in Quick Polls | 0          | 0          | 0         |
| Viewed a photo                  | 0            | Posted on Guestbooks        | 0          | 0          | 0         |
| Downloaded a document           | 381          | Contributed to Stories      | 0          | 0          | 0         |
| Visited the Key Dates page      | 95           | Asked Questions             | 0          | 0          | 0         |
| Visited an FAQ list Page        | 0            | Placed Pins on Places       | 0          | 0          | 0         |
| Visited Instagram Page          | 0            | Contributed to Ideas        | 4          | 4          | 0         |
| Visited Multiple Project Pages  | 297          |                             |            |            |           |
| Contributed to a tool (engaged) | 8            |                             |            |            |           |

## ENGAGEMENT TOOLS SUMMARY



| Tool Type | Engagement Tool Name   | Tool Status | Visitors | Contributors |            |           |
|-----------|--|-------------|----------|--------------|------------|-----------|
|           |  |             |          | Registered   | Unverified | Anonymous |
| Newsfeed  | Addendum Report to Development Charges Background Study p... | Published   | 15       | 0            | 0          | 0         |
| Newsfeed  | Help shape growth-related funding in Milton                  | Published   | 8        | 0            | 0          | 0         |
| Newsfeed  | Statutory Public Meeting Notice: Development Charges By-l... | Published   | 7        | 0            | 0          | 0         |
| Newsfeed  | Share your input on draft strategies that support growth     | Published   | 5        | 0            | 0          | 0         |
| Newsfeed  | Report to Council March 16, 2026 - Revision to Timing        | Published   | 5        | 0            | 0          | 0         |
| Newsfeed  | Have your say on growth funding in Milton                    | Published   | 3        | 0            | 0          | 0         |
| Newsfeed  | Second Addendum Report to Development Charges Background ... | Published   | 3        | 0            | 0          | 0         |
| Newsfeed  | Third Addendum Report to Development Charges Background S... | Published   | 0        | 0            | 0          | 0         |
| Ideas     | Feedback Forum   | Archived    | 113      | 3            | 4          | 0         |

## INFORMATION WIDGET SUMMARY



| Widget Type | Engagement Tool Name   | Visitors | Views/Downloads |
|-------------|--|----------|-----------------|
| Document    | Town of Milton 2025 Development Charges Background Study.pdf           | 140      | 320             |
| Document    | Land Appraisal Report for DC and CBC Studies.pdf                       | 105      | 216             |
| Document    | Town of Milton Community Benefits Charge Strategy.pdf                  | 83       | 129             |
| Document    | DC Study - Addendum Report 1 - 13-Mar-2026.pdf                         | 42       | 68              |
| Document    | 2023-2027 Strategic Plan   | 25       | 28              |
| Document    | Responses to Delta Urban - MP4 Landowners Letter dated 6-Feb-2026.pdf  | 24       | 42              |
| Document    | Responses to BILD Letter dated 30-Jan-2026.pdf                         | 23       | 50              |
| Document    | Master Plans   | 23       | 24              |
| Document    | DC Study - Addendum Report 2 - April 1 2026                            | 22       | 32              |
| Document    | Official Plan  | 21       | 25              |
| Document    | Draft CBC By-law - 23-Jan-2026.pdf                                     | 13       | 22              |
| Document    | 2026 Budget  | 13       | 15              |
| Document    | Draft DC By-law Uniform Non-Residential Rate - 23-Jan-2026.pdf         | 11       | 15              |
| Document    | Draft DC By-law Differentiated Non-Residential Rate - 23-Jan-2026.pdf  | 10       | 19              |
| Document    | Recording of DC CBC Engagement Session 1 - Dec. 1 2025                 | 8        | 9               |
| Document    | Q and A - Additional Stakeholder Meetings - 12-March-2026.pdf          | 7        | 7               |
| Document    | Responses to 4-March-2026 Letter - David Schaeffer Engineering Ltd.pdf | 6        | 11              |
| Document    | DC Study - Addendum Report 3 - April 17 2026                           | 5        | 5               |

| Widget Type | Engagement Tool Name   | Visitors | Views/Downloads |
|-------------|--|----------|-----------------|
| Document    | DC Study - Addendum Report 3 - April 17 2026                           | 5        | 5               |
| Document    | Responses to Delta Urban - MP4 Landowners - Second Comment Submissi... | 5        | 6               |
| Document    | Development Charge and Community Benefit Charge By-laws – Revision ... | 1        | 3               |
| Document    | Responses - BILD (KR Planning Group) - Final - 16-Apr-2026.pdf         | 0        | 0               |
| Key Dates   | Key Date   | 95       | 127             |
| Video       | Virtual Engagement Session #2 - Development Charges and Community B... | 6        | 6               |
| Video       | Virtual Engagement Session #1 - Development Charges and Community B... | 1        | 1               |

## IDEAS

### Feedback Forum

|                     |                       |                         |
|---------------------|-----------------------|-------------------------|
| Visitors <b>113</b> | Contributors <b>7</b> | CONTRIBUTIONS <b>10</b> |
|---------------------|-----------------------|-------------------------|

|  |  |
|--|--|
| <p>19 January 26</p> <p>Pnear</p> <p>VOTES<br/><b>0</b></p>    | <h3>Growth Should Be Self-Funded</h3> <p>Based on the documents provided, the cost of this growth is anticipated to be \$693M with \$ 592M recovered by development fees. That leaves \$101M to be funded by the existing taxpayers who will not directly benefit from this development, which is not acceptable.</p> <p>I would suggest that the cost number is under-scoped, as the town is desperately in need of next-generation infrastructure to support this growth and density. Our roads are over-subscribed and most of the arterial roads in the core have no room for expansion, so we will need to invest in costly automated traffic management and transit for the core to accommodate growth.</p> <p>Two concrete recommendations:</p> <ol style="list-style-type: none"> <li>1. Validate the costs against next-generation infrastructure requirements not just past costs.</li> <li>2. Adopt a philosophy whereby growth funds growth, and target development charges that match that philosophy.</li> </ol> |
| <p>19 January 26</p> <p>Pnear</p> <p>VOTES<br/><b>0</b></p>    | <h3>Validate Residents Per Unit, 3.1 seems low</h3> <p>The study assumes that each residential unit will bring with it an additional 3.1 new residents. Anecdotally, that seems low with new growth often including multiple generations or multiple families due to affordability.</p> <p>We should validate the next 10 years of growth against actuals for the last 10 years, and ensure we're not using a national average. Milton's new-resident demographics are not the same as other communities, and a bad assumption here could have trickle-down impacts to other investments (eg number of sports facilities required per residential unit, number of parking spaces required per unit, transit required per unit, etc)</p>  |
| <p>17 November 25</p> <p>KeithR</p> <p>VOTES<br/><b>0</b></p>  | <h3>Developers must not be allowed to talk their way out of paying development charges.</h3> <p>I support developers paying Community Benefits Charges. (Perhaps exemption or reduction could be made for truly affordable apartments.)</p>  |
| <p>11 November 25</p> <p>Sheetal</p> <p>VOTES<br/><b>0</b></p> | <h3>Transportation</h3> <p>Hello: i was wondering if the transit can be improved in Milton? Can more buses be added during peak hours?</p>   |

## IDEAS

### Feedback Forum

|  |  |
|--|--|
| <p>11 November 25</p> <p>Helen NIKON</p> <p>VOTES<br/><b>0</b></p> | <h3>No more high rise buildings in Milton</h3> <p>I am totally against of building high rise buildings in Milton. All roads in Milton already congested, it is hard to drive even to local stores. Georgetown does not have high rise buildings at all and holds its charm and people enjoy living there, and property value remains higher than in Milton, because people enjoy living there. Do not ruin Milton's by making these tall buildings and making crowds in this town! Home prices in Milton are getting down because of this enormous buildings strategy, buildings just for living, but not for enjoyment.</p> |
|--|--|

|                           |  |
|---------------------------|--|
| 17 November 25<br>Cecilia | Development Charges (DC) paid by developers absolutely should be mandatory. It can support growing density that they are creating. |
| VOTES<br>0                |  |
| 17 November 25<br>Cecilia | If we implement Community Benefit Charges (CBCs), they should apply to all residents. Not just lower income folks in high rises!   |
| VOTES<br>0                |  |

## IDEAS

### Feedback Forum

|                                |  |
|--------------------------------|--|
| 20 December 25<br>annmarie-gus | <h3>Milton Senior Centre new name 55+ Club</h3> <p>Letter to the Town of Milton<br/>Subject: Enhancing the Milton Senior Centre and Creating a 55+ Club<br/>Dear Town of Milton Council,</p> <p>As a long-time resident and active participant in the fitness programs at the Milton Senior Centre, I want to express both my appreciation and my concerns. The Centre has truly become the hub of our senior fitness community. The classes are consistently full to capacity, and with the 55+ population growing every year, demand will only continue to rise.</p> <p>That said, the facility is showing its age. The fitness floors in both the upstairs and downstairs rooms need repairs, and the building itself would benefit from fresh paint, updated bathrooms, and general sprucing up. Our senior taxpayers enjoy the Centre not only for fitness but also for social gatherings, weekend parties, and community events. It deserves to reflect the vibrancy of the people who use it.</p> <p>With the adjacent police station soon vacating, I see a unique opportunity. Instead of investing in high-rise condos, why not repurpose that building into a "55+ Club"? Many of us prefer this terminology over "senior," as it feels more inclusive and welcoming. This new facility could house the larger fitness classes, designed with wooden floors and mirrors so instructors and participants alike can ensure proper form and safety. Meanwhile, the existing Senior Centre could focus on games such as pool and cards, while also continuing to host community rentals.</p> <p>This dual-building approach would not only meet the growing needs of our aging population but also generate additional income through expanded rentals and events. It would create a more friendly, modern, and functional environment for all residents over 55, while preserving the sense of community that makes Milton special.</p> <p>I hope you will consider this proposal seriously. It represents an investment in the health, happiness, and social connection of Milton's residents—an investment that will pay dividends for years to come.</p> <p>Milton is growing at an unprecedented pace, and our facilities must grow with it. The Senior Centre and any future 55+ Club should reflect the needs of a larger, more active population. By investing in these spaces now, the Town ensures that residents over 55 have access to fitness, social connection, and community events that match the scale of Milton's growth. This is not just about keeping up—it's about planning ahead and making Milton a model for how communities can thrive as they expand.</p> |
| VOTES<br>0                     |  |