

Oxford County
21 Reeve Street, P.O Box 1614
Woodstock, Ontario, N4S 7Y3

May 17, 2024

Attn: Jennifer Lavallee, Manager of Capital Planning

RE: Comments on Oxford County 2024 Development Charges Background Study

On behalf of Cachet Homes, we would like to extend our appreciation to Oxford County for the opportunity to review and provide comments on the recently released 2024 Development Charges Background Study prepared by Watson & Associates Economists Ltd.

Our team, particularly our economist (KPEC Inc.) and our engineer (SCS Consulting Group Ltd.) have reviewed the document and we are pleased to provide the attached memorandum's for your consideration which outlines our observations, questions, and recommendations as it relates to our lands located in Woodstock and Ingersoll. We trust that our insights will contribute positively to the ongoing dialogue surrounding development charges in Oxford County.

Should you require any further clarification or information regarding our submission, please do not hesitate to reach out to us at any time.

Yours sincerely,



Jessie Ha Kong
Director of Land
Cachet Homes

Cc:

Sean-Michael Stephen, Watson & Associates Economists Ltd.

Daryl Keleher, KPEC Inc.

Phil Sheridan, SCS Consulting Group Ltd

Attachments:

Memo prepared by KPEC Inc. re: Review of 2024 Oxford County DC Background Study

Memo prepared by SCS Consulting Group Ltd. re: Review of 2024 Oxford County DC Background Study

May 17, 2024

Memorandum to: Marcus Gagliardi
Cachet Homes

From: Daryl Keleher, MCIP, RPP, Principal
Keleher Planning & Economic Consulting Inc.

Re: Oxford County DC Review
Our File: P1137

Keleher Planning & Economic Consulting Inc. was retained by Cachet Homes to review the County of Oxford's 2024 Development Charges Background Study and proposed DC by-law. This memorandum provides the questions and comments from my review.

CHANGES TO DC RATES

The figure below summarizes the current and proposed DC rates in Oxford County as calculated in the County's 2024 DC Study, with the rates showing being those per single-detached unit (SDU). The County-wide DC rates are proposed to increase by 50%, driven by increases to the Library DC (+141% or \$897 per SDU), the Roads DC (+9% or \$364 per SDU), and the introduction of a Long-Term Care DC in the amount of \$1,857 per SDU.

The various area-specific DC rates are proposed to decrease in four of the nine areas, and increase from 41% to 466% in the other five areas. Two new area-specific DCs appear (??) to have been introduced (Innerkip and Embro). It is understood that Cachet Homes owns lands in Woodstock (where the ASDC rate is proposed to decrease by 2% or \$160 per SDU), and Ingersoll (+48% to ASDC, or \$4,742 per SDU).

Figure 1

Current and Proposed DC Rates, Oxford County, per Single-Detached Unit

County-Wide	Current	Proposed	Change	% Change
Studies	\$ 151	\$ -	\$ (151)	-100%
Ambulance	\$ 482	\$ 48	\$ (434)	-90%
Roads	\$ 3,894	\$ 4,258	\$ 364	9%
Long-Ter Care	n.a.	\$ 1,857	\$ 1,857	n.a.
Waste Diversion	\$ 46	\$ 139	\$ 93	202%
Library	\$ 638	\$ 1,535	\$ 897	141%
Total	\$ 5,211	\$ 7,837	\$ 2,626	50%
Area-Specific W/WW				
Woodstock	\$ 6,979	\$ 6,819	\$ (160)	-2%
Tillsonburg	\$ 9,162	\$ 7,650	\$ (1,512)	-17%
Ingersoll	\$ 9,943	\$ 14,685	\$ 4,742	48%
Thamesford	\$ 8,997	\$ 12,662	\$ 3,665	41%
Norwich	\$ 13,740	\$ 9,893	\$ (3,847)	-28%
Tavistock	\$ 17,289	\$ 40,265	\$ 22,976	133%
Plattsville	\$ 28,548	\$ 11,773	\$ (16,775)	-59%
Innerkip	n.a.	\$ 16,163	\$ 16,163	n.a.
Embro	n.a.	\$ 10,360	\$ 10,360	n.a.
Drumbo	\$ 5,883	\$ 33,287	\$ 27,404	466%
Mt. Elgin	\$ 8,547	\$ 15,063	\$ 6,516	76%
Total by Area				
Woodstock	\$ 12,190	\$ 14,656	\$ 2,466	20%
Tillsonburg	\$ 14,373	\$ 15,487	\$ 1,114	8%
Ingersoll	\$ 15,154	\$ 22,522	\$ 7,368	49%
Thamesford	\$ 14,208	\$ 20,499	\$ 6,291	44%
Norwich	\$ 18,951	\$ 17,730	\$ (1,221)	-6%
Tavistock	\$ 22,500	\$ 48,102	\$ 25,602	114%
Plattsville	\$ 33,759	\$ 19,610	\$ (14,149)	-42%
Innerkip	\$ 5,211	\$ 24,000	\$ 18,789	361%
Embro	\$ 5,211	\$ 18,197	\$ 12,986	249%
Drumbo	\$ 11,094	\$ 41,124	\$ 30,030	271%
Mt. Elgin	\$ 13,758	\$ 22,900	\$ 9,142	66%

Source: KPEC based on Oxford County 2024 DC Study

QUESTIONS AND COMMENTS

Roads

- 1) What does the \$6.1 million cost for the Harris Street & Clarke Intersection Design & Construction (Roundabout) project include? Similarly, what is included in the two \$6.0 million projects (63 & 64) for roundabouts on Oxford Road 12?
- 2) What is included in the \$11.8 million intersection at Oxford 17 & Oxford 4?

- 3) What is the basis for inclusion of Rural Storm Sewer costs in the DC – is there growth anticipated in these areas? How do these works facilitate growth in the County’s urban areas?
- 4) Can details be provided for the Major Road Reconstruction projects with respect to whether any of the works include additional travel lanes, and if not, how the reconstruction benefits growth?
- 5) Can details be provided for the Road Urbanization projects with respect to whether any of the works include additional travel lanes, and if not, how the reconstruction benefits growth?

Long-Term Care

- 6) The project cost for the 160-bed expansion is \$90.5 million for a 160-bed expansion, which amounts to a per bed cost of \$565,625. Can details behind the project cost be provided?

Water / Wastewater

Woodstock W/WW

- 7) To what extent do the Woodstock WWTP “Operational Upgrades” add capacity to the WWTP? Of the \$14.8 million in capital costs, approximately \$5.0 million is identified as a DC recoverable cost.
- 8) Does the \$5.0 million “Brick Pond Sanitary Trunk Sewer Realignment” add any capacity for growth? The BTE of 50% would imply that the capacity of the trunk sewer after the realignment will have doubled.
- 9) What is the nature of the “Sanitary Sewer Replacement”, which is allocated 80% BTE and 20% to the DC (split between in-period and post-period growth)?
- 10) The Woodstock Biogas Project (Water project #9), with a capital cost of \$2,480,000 is not found in the 2024 WWMP – can the source document identifying the need for this project be provided, as well as an indication of how it is growth-related?
- 11) Many of the projects in the 2024 DC Study have capital costs that match those included in the 2024 WWMP. The capital costs for Woodstock W/WW works have increased since the 2024 WWMP – can the basis for cost increases compared to another 2024 document, only for these specific projects be provided?

Figure 2

Project	2024 WWMP	2024 DC Study
Water Project #3	\$10,620,000	\$11,320,210
Water Project #4	\$354,000	\$554,000
Water Project #9	\$4,500,000	\$4,750,000
Water Project #12	\$2,858,000	\$2,957,800

- 12) All of the projects listed in the Woodstock W/WW ASDC are included in the 2024 WWMP, except for four projects (one water, three WW) in the Pattullo Industrial Park – it is understood that the works

were identified in a June 2020 Wastewater Servicing Report, but the costs appear substantially different between the two documents.

Figure 3

Project #	Description	Gross Capital Cost
Water #15	Pattullo Industrial	\$277,805
WW #15	Pattullo Industrial Park – Sewage Pumping Station	\$5,421,923
WW #16	Pattullo Industrial Park Forcemain	\$401,215
WW #17	Pattullo Industrial Park – Sanitary Oversizing	\$176,000

Ingersoll W/WW

- 13) The majority of Water and Wastewater capital projects are for either the Wallace Line Industrial park or the Southwest Industrial park – is the allocation of costs to the residential sector of 67% and non-residential sector of 33% appropriate and consistent with the expected benefit to be received from the works in creating capacity for growth?
- 14) Project #5 is for “ING – Well 7 Upgrade” at a capital cost of \$350,000, however this project is not found in the discussion of Ingersoll water servicing needs in the 2024 WWMP, but a “well 7” is reference to Tillsonburg in the 2024 WWMP, nor in Table 3 of the Water Servicing Strategy for the Southwest Ingersoll Secondary Plan (as set out in a memo from Dillon dated August 18, 2023) – can the basis for the inclusion of these costs in the Ingersoll ASDC be provided?

Population, Household and Employment Forecasts

- 15) Schedule 2A includes the amount of growth over the 2024-2034 period broken out by municipality, but does not provide an indication of the resulting population by area is at 2034, or what the estimated/assumed starting 2024 population is for each area. While County-wide figures are provided in Schedule 3, can the County provide the additional data?
- 16) Compared to the Official Plan forecast allocation between 2016-2036, the allocation in the 2024 DC Study is disproportionately allocated to Tillsonburg, with less than expected growth (compared to ratios in the OP), in Woodstock and Ingersoll. Assuming the capital costs are the same as what is contained in the DC Study, the potential understating of growth in centres such as Woodstock and Ingersoll may serve to overstate the calculated DC rate.

Figure 4

Comparison of Official Plan and 2024 DC Study Growth by Local Municipality

Municipality	Official Plan - Households (Figure 6)				2024 DC Study			Difference
	2016	2036	2016-2036	Share of County-Wide Growth	Housing Growth (Table 3-2)	Share of County-Wide Growth	Expected Share (based on OP Shares)	
Woodstock	17,100	21,200	4,100	50.6%	5,165	43.3%	6,039	(874)
Tillsonburg	7,200	8,300	1,100	13.6%	2,670	22.4%	1,620	1,050
Ingersoll	5,000	5,900	900	11.1%	1,145	9.6%	1,326	(181)
Blandford-Blenheim	2,700	3,200	500	6.2%	445	3.7%	736	(291)
East Zorra - Tavistock	2,600	3,000	400	4.9%	720	6.0%	589	131
Norwich	3,700	4,300	600	7.4%	685	5.7%	884	(199)
South-West Oxford	2,600	2,800	200	2.5%	355	3.0%	295	60
Zorra	3,000	3,300	300	3.7%	745	6.2%	442	303
Total Oxford County	43,900	52,000	8,100	100.0%	11,930	100.0%	11,930	-

Source: KPEC based on Oxford County Official Plan and 2024 DC Background Study

Marcus Gagliardi, Senior Land Development Manager

South Thames Developments Inc.
2555 Meadowpine Boulevard, Unit 3
Mississauga, Ontario, L5N 6C3

Dear Mr. Gagliardi:

**Re: Review of 2024 Oxford County Development Charge Background Study
South Thames Developments Inc.
South West Ingersoll Secondary Plan, Town of Ingersoll**

As requested, SCS has reviewed a copy of the April 12, 2024 Development Charge (D.C.) Background Study prepared by Watson & Associates on behalf of Oxford County. Our review has generally focused on the following sections of the D.C. Background Study:

- ➔ Services Related to a Highway (Section 5.2.1)
- ➔ 10-Year Capital Costs for D.C. Calculation for Area-Specific Services for the Town of Ingersoll (Section 5.3)

The following is a summary of assumptions that require further clarification from the County and/or Waston:

1. The study does not appear to include sufficient detail on how the “Benefit to Existing Development” (BTE) percentages have been calculated for the proposed Ingersoll water and wastewater projects. As an example, a BTE was assigned to upgrade the existing Ingersoll Water Well No. 7, but not existing Ingersoll Water Well No. 11. Watson should provide a summary of how the BTE has been calculated for the various Ingersoll water and wastewater projects.
2. It is unclear how the proportionate share for residential versus non-residential developments for water and wastewater services within Ingersoll (Tables 5-11 and 5-12) have been derived.
 - It is also noted that different proportionate shares have been applied for water versus wastewater projects, potentially suggesting certain development areas may already have one or the other services readily available.

Watson should provide additional detail to justify how the proportionate shares have been calculated.

Re: **Review of 2024 Oxford County Development Charge
Background Study
South Thames Developments Inc.
South West Ingersoll Secondary Plan, Town of Ingersoll**

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May 13, 2024
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3. For the proposed wastewater project entitled “Wallace Line Sanitary Sewer from Midblock Industrial Site to north of CNR to Hamilton” (Project No. 950336 – ING), the County and/or Watson should confirm whether the Gross Capital Cost includes the full cost of design and construction of the sewer between the CNR right-of-way and Hamilton Road, since it was understood that the developer will be responsible for the local servicing costs associated with the sewer within the South Thames Development lands (but not including the trenchless crossing of the railway).

Please contact the undersigned if you have any questions or require any additional information.

Sincerely,

SCS Consulting Group Ltd.



Phil Sheridan, P.Eng.
psheridan@scsconsultinggroup.com

Document3

May 17, 2024

To: Jennifer Lavalee, Manager of Capital Planning, County of Oxford
Re: Development Charges Background Study

Dear Ms. Lavalee,

We are the owners, personally, of [REDACTED], Zorra Township, consisting of some 55 acres of land in the village of Embro. Langlois Farms Limited owns 14 acres which are the subject of a possible extension of the current five-acre development wherein we have built six townhouse units. We also contracted with Sinclair Homes to build on 24 single-family lots, and they have sold 12 homes over the past three years. We are much more oriented toward farming than residential development, but we realize that we own property in a strategic location for development. We recently advanced a proposal to the County's Planning Department and the Township of Zorra for the extension of the first phase (described above). Within this project we are willing to donate a 2.25-acre site to the Township/County for an affordable housing project. We also own the five-acre former Day property, which is within the designated Secondary Plan. There are several others also proposing development within the village (Hall, Losee, and the now-surplus Township sheds site).

It does not appear that the Development Charges Background Study is granular enough to address anticipated growth within the Village of Embro. And since past growth is not always a reliable indicator of future growth, especially where market factors have changed substantially (such as the greater mobility of homebuyers who can work from home and therefore may choose smaller municipalities than previously), it is important to ensure that all development plans are accounted for in the County's planned capital improvements. We must rely on our municipal governments to supply the water and wastewater capacity that will allow for future development.

We would welcome a Township-led or County-led consultation process about servicing needs with all owners of development land within the Embro urban boundary, and with experts in the community who can speak to the challenge of the village's inadequate water supply for the future.

Sincerely,

John and Susanne Langlois

[REDACTED]

Sue Langlois: [REDACTED]

John Langlois: [REDACTED]

From: [Lynn Buchner](#)
To: [Lynn Buchner](#)
Subject: Special Development Charges for a Special Situation
Date: Wednesday, June 5, 2024 12:01:33 PM

On May 21, 2024, at 11:51 AM, Marcus Ryan <mryan@oxfordcounty.ca> wrote:

Thanks for emailing. I'm looking into where your comment went, and why Council didn't hear it.

I do not expect a response after hours or on weekends. I sent this email at my convenience and welcome a response at your convenience.

MARCUS RYAN
Warden, Oxford County | Mayor, Zorra Township
1.519.539.9800 x3003
Pronouns: he/him/his
www.oxfordcounty.ca

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On May 15, 2024, at 2:45 PM, Genevieve Bittner

 wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dr. Mr. Ryan, Mr. Peterson and Oxford County Council members,

I write to you on behalf of the 2024 Bright Water Security Committee. I co-chair the committee with André Dittrich, who is copied on this email.

Last week, on May 8, you held a Development Charges open meeting. The advertisement said that suggestions and ideas could be sent ahead to the clerk.

I sent a suggestion from our committee to Ms Chloé Senior on April 30th, via email.

Unfortunately, the public meeting was held at a time when many of our committee members were not able to attend, since it was during regular working hours.

We did take the opportunity to watch the recording of the May 8th meeting. We found it very interesting to hear about how the Development charges are calculated, followed by various speakers who gave reactions to, and suggestions for, the Development charges study.

We were disappointed to see that our suggestion (sent by email) was not acknowledged during the meeting. I am not aware as to whether our suggestion was forwarded to Council members. I will enclose it below.

The first speaker, who explained the calculations, referred to a chart where Blandford-Blenhiem towns were shown to have changing development charges.

We noticed that Bright was not on the chart. As you will see in the enclosed original email to the clerk, we have a suggestion regarding development charges for the pending home building in Bright.

Thank-you for your attention to our suggestion.

Genny Bittner
Co-Chair, 2024 Bright Water Security Committee

Here is the email from April 30, 2024:

Dear Ms Chloé Senior,

The 2024 Bright Water Security Committee represents concerned residents in Bright who worry about the capacity and quality of our water.

The "2024 Water and Wastewater Master Plan" backup plan is trucking water to Bright if the capacity of our wells dwindles. Historically our wells fill with silt.

The Plattsville water treatment plant, and subsequent water pipeline to Bright, have been approved in the *Master Plan*, to **begin** in 2029 to 2033.

This means that it is possible that the start of operations could be as late as 2035.

Bright needs a safe sustainable water system, and that requires funding.

Through development charges at building permit issue time, could there be a specific water project fee which is designated to help fund the water pipeline from Plattsville to Bright?

There 17 homes in the "Bright Meadows Estates" (Hewitt Street) subdivision that are approved; 3 have been built, and an opportunity was missed.

Fourteen homes are yet to be built in this area. These homes, along with future commercial and residential development, will put a greater strain on our two wells in Bright.

Suggestion:

Could specific water project fees be charged to developers in Bright, starting now and moving forward?

These fees would need to have a specific funding envelope for the pipeline project.

This would shorten the time required to gather the necessary funds for the project.

TIME IS MONEY. The longer the County waits to initiate the treatment plant and pipeline, the more expensive it will be.

Oxford County has the opportunity now to add specific development charges for a specific situation.

Thanks for your attention to this idea,

Genny Bittner
Co-Chair,
2024 Bright Water Security Committee