

June 7, 2019

**By E-Mail Only to *heather.mifflin@brant.ca***

Ms. Heather Mifflin  
Director of Finance, Treasurer  
County of Brant - Administration  
26 Park Avenue, P.O. Box 160  
Burford, ON N3L 2M2

Dear Ms. Mifflin:

**Re: Paris Grand Estates Inc. ("Paris Grand")  
2019 Development Charges Background Study (the "2019 DC Background Study")  
Watson & Associates Economists Ltd. (May 23, 2019)**

We are counsel to Paris Grand.

In advance of the June 25, 2019 Public Meeting, please find enclosed a Memorandum from our client's engineering consultant, MTE Consultants Inc., outlining our client's comments, questions and concerns about the 2019 DC Background Study.

We trust this is satisfactory. If you have any questions or require further information, please do not hesitate to contact me or Mr. Alex Lusty of our office.

**Yours sincerely,**  
DAVIES HOWE LLP

**Michael Melling**

MWM:sl  
encl.: As above

copy: Client  
Mr. Ward Wilson, MTE Consultants Inc.  
Mr. Glenn Scheels, GSP Group



# EXTERNAL MEMORANDUM

**TO:** Heather Mifflin,  
Director of Finance,  
Treasurer  
heather.mifflin@brant.ca

**COMPANY:** County of Brant  
66 Grand River Street  
North,  
Paris, ON, N3L 2M2

**MTE FILE NO.:** 41899-114

**DATE:** June 7, 2019  
**FROM:** Ward Wilson  
wwilson@mte85.com

**PROJECT NAME:** Paris Grand Subdivision

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**Re: County of Brant Development Charges Background Study prepared by Watson & Associates Economists Ltd. dated May 23, 2019 (the “2019 DC Background Study”)**

We are the engineering consultants for Paris Grand Estates Inc. (the “Owner”), the registered owner of lands in the Paris Community (“Paris”) within the County of Brant (the “County”).

On June 15, 2018, the Owner entered into Minutes of Settlement (the “MOS”) with the County in respect of an appeal of the County’s failure to make a decision on the Owner’s rezoning and plan of subdivision applications to permit residential and other compatible uses on the lands (the “Paris Grand Subdivision Development”). In accordance with the MOS, there will be three phases to the Paris Grand Subdivision Development: Short Term (“ST”), Medium Term (“MT”) and Long Term (“LT”). For each of the Phases, the MOS contemplates infrastructure construction and financing for the MT and LT phases.

Accordingly, we have reviewed the 2019 DC Background Study in relation to the Paris Grand Subdivision and the MOS and provide the following comments and questions on behalf of the Owner.

## **Services Related to a Highway**

The extension of Silver Street as secured in the MOS and recommended in the ongoing Grand River Street North (“GRSN”) Municipal Class Environmental Assessment (the

“EA”) will be a collector road external to development. The extension is comprised of two legs: (1) from GRSN to intersect with a new road within the Paris Grand Subdivision Development known as the “Y-Road” (the “Western Leg”); (2) from the “Y-Road” to the Dufferin Aggregate Pit (the “Eastern Leg”).

The Western Leg will benefit existing traffic on Paris Links Road and the existing West River Road to enter and exit Paris, as well as benefit existing traffic on GRSN by improving the function and level of service of the existing Silver Street/GRSN intersection.

Both the Western Leg and the Eastern Leg will provide improved access to Paris Grand Subdivision Development, as well as potential future development lands within the Paris urban area east of Paris Grand Subdivision. Additionally, the Eastern Leg will provide access to a future By-pass identified in the EA.

Accordingly and as contemplated by the MOS, **both the Western Leg and Eastern Leg of this new collector road should be included in the 2019 DC Background Study as a DC eligible project** in accordance with Appendix E (Section E.1.1 d.), with the appropriate Benefit to Existing (“BTE”) attribution.

### **Water Services**

The County has determined that a new water supply is required to accommodate the ultimate build-out of the Paris urban area. While this is not required for the ST Phase of the Paris Grand Subdivision, in accordance with the MOS, the County agreed that there is or will be sufficient water for the Paris Grand Subdivision Development by the time of the MT Phase.

The 2014 Development Charges Background Study (“2014 DC Background Study”) included a New Water Source for \$8.629M in 2025/26. However, the 2019 DC Background Study includes an “Additional Water Source for Paris” for \$15M in 2028 (Project # 19-117). Given this change, we have the following questions:

- Why has the cost for “Additional Water Source for Paris” increased from \$8,629,000 in the 2014 DC Background Study to \$15,000,000 in the 2019 DC Background Study?
- Why has the timing for “Additional Water Source for Paris” been delayed until 2028?

With respect to timing, given that the MOS requires the County to ensure sufficient water supply for the MT phase, **we request that the timing be advanced to 2025 or sooner**, so that future development of the Paris Grand Subdivision is not delayed.



# EXTERNAL MEMORANDUM

## Wastewater Services

Upgrades to sewers on William Street and Willow Street, as identified in the Paris Master Servicing Plan (the "MSP"), are not specifically identified in the 2019 DC Background Study. We note that the 2014 DC Background Study included Project # P-2-4 – Willow St Sewer Replacement - \$495,000 in 2022. Accordingly, it is unclear why it has not been identified in the 2019 DC Background Study. Similar to Projects 19-160 and 19-161, **upgrades to sewers on William Street and Willow Street should be included in the 2019 DC Background Study as an additional project.**

Additionally, the 2014 DC Background Study included Project # P-2-3 - Paris Links Sewage Pumping Station Upgrades - for \$5,000,000 with 41% BTE. It is unclear why the 2019 DC Background Study does not include this project. The proposed Paris Links Sewage Pumping Station & Forcemain in the Paris Grand Subdivision Development will replace the aging existing Paris Links Pumping Station, and will service the Paris Grand Subdivision as well as future development lands within the Paris urban area to the east. **Accordingly, this pumping station should be included in the 2019 DC Background Study as a DC eligible project** in accordance with Appendix E (Section E.5), with the appropriate BTE allocation.

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

Yours truly,

**MTE CONSULTANTS INC.**

A handwritten signature in blue ink, appearing to read "Ward A. Wilson".

Ward A. Wilson, P.Eng.  
Vice President

c.c. Client  
Michael Melling and Alex Lusty, Davies Howe LLP