



November 19, 2021

The Honourable Stephen Lecce  
Ministry of Education  
5th Floor, 438 University Ave.  
Toronto, ON M5G 2K8

Re: Capital Project Funding and Ministry Approval Delays

Dear Minister Lecce,

For the past number of years, Halton region has been experiencing intense growth which resulted in an increase in the student population for the Halton District School Board (HDSB). With this, we have gained much experience building new schools and navigating what is becoming a more complicated approval process. Our school construction challenges arise throughout the process including difficulty acquiring prepared land in a timely fashion, various onerous approval processes and timelines including municipal by-laws, site plan approvals and permits, provincial government approvals, and more recent supply shortages which have increased costs.

The Trustees of the Halton District School Board request that the capital projects approval process be reviewed and streamlined in recognition of the detrimental impact on school opening timelines. The Trustees also request that benchmark funding more closely reflect the current, and escalating costs of building schools. These points are addressed in our letter.

The delays in Ministry of Education approvals for **fully-funded projects** is onerous and time-consuming. The Ministry's own [chart](#) outlines approvals at the following stages:

- 1 approval at the Pre-design stage
- 2 approvals at the Pre-tender stage
- 1 approval at the post-tender stage

In addition to this, the board must provide a third-party cost consultant analysis through the design process prior to tender.

As an example, a current project, Milton #12 was submitted by staff for Approval to Proceed (ATP) in June 2021 and it received Minister approval in September (3 months). This is in an environment with rapidly escalating costs, with the consequence that by the time ATP is received and the tender closes,

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construction costs have risen above the proposed budget. As a result, the Board is required to return to the ATP stage to seek additional Ministry approvals to utilize scarce HDSB funds. This is a highly unproductive and costly cycle.

The four approvals required by the Ministry alone, along with the associated timeframes for approval, add a year to the overall project. This is time that we don't have and it is in addition to timelines for site plan and building permit approvals, which vary by municipality, township, and are impacted by town and municipal staff workload. In some cases, the Board may also need to seek re-zoning, zoning by-law amendments. Out of necessity, the HDSB has initiated construction on lands that the board doesn't fully own based on partial permit releases (foundation and superstructure permits).

It is imperative that we reduce accommodation pressures and temporary locations for students, necessitated by the steep population growth in some communities in our region. The HDSB Facility Services team has used a small pool of qualified consultants and repeat school designs to expedite the process of approval and minimize cost escalations. Despite this, the Ministry has effectively reduced capital benchmark funding by asking board staff to conform to building new schools at 90% of the benchmark funding. This effectively reduces the funding for our schools, the footprint of our school buildings as well as services and amenities for our communities, and does not address student accommodation needs.

Focussing on the past five years, HDSB has been actively building schools in Milton and Oakville. The cost per square foot of each elementary school is listed below:

- Milton #10 (Viola Desmond PS, Tendered 2017) - \$176/sq. ft.
- Oakville #2 (Dr. David D Williams PS, Tendered 2019) - \$213/sq. ft.
- Milton #11 (TBD PS, Tendered 2020) - \$213/sq. ft.
- Milton #12 (TBD PS, Tendered 2021) - \$250/sq. ft.

Based on these four elementary schools, capital costs of construction have escalated roughly 42%. This Ministry's benchmark funding falls short of these costs, and the gap is widening. For our newest Milton secondary school, Elsie McGill, the HDSB had to increase the budget beyond Ministry funding by \$3M using HDSB funds. This is not sustainable or equitable, as it impacts other areas, including our ability to upgrade aging schools adequately and in a timely way.

As costs rise, we move further and further from the benchmark, further depleting HDSB funds and adding delays to projects due to the additional approvals and time required when tenders exceed approved funding amounts. This frustrates our parent communities. A family waiting for a new school may have children at multiple holding schools. These schools end up with fields of portable classrooms and shrinking outside space for students for curricular and recess activities, and there is reduced access to common spaces like libraries, music rooms, science labs, technology studies rooms and gymnasiums. At the core of this issue, is our belief that we must do better for students and staff.

The Trustees of the Halton District School Board appreciate your attention to review and streamline the capital projects approval process so that we can mitigate the detrimental impact on delays in school openings and that benchmark funding be revised to reflect the current, and escalating costs of building schools.

Sincerely,



Andréa Grebenc  
Chair of the Board of Trustees  
Halton District School Board

Cc: Hon. Ted Arnott, MPP  
Stephen Crawford, MPP  
Hon. Parm Gill, MPP  
Hon. Jane McKenna, MPP  
Effie Triantafilopoulos, MPP  
Ontario Public School Boards' Association (OPSBA) President  
Ontario School Board Chairs (English Public, English Catholic, French Public,  
French Catholic)  
Gary Carr, Halton Regional Chair  
Gordon Krantz, Mayor of Milton  
Rob Burton, Mayor of Oakville