

October 7, 2025

Electronic Submission only

ATTENTION:

Minister of Municipal Affairs and Housing
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Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)

Background

In 2024, the Ontario Government released the final version of the [Provincial Planning Statement, 2024 \(PPS, 2024\)](#) and a regulation that revokes “A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019” (Growth Plan) in its entirety, as of October 20, 2024. The Province announced its review of the Growth Plan and the Provincial Policy Statement, 2020 (PPS, 2020) in late 2022.

The PPS, 2024 maintains, similar to the Growth Plan, that “Provincial guidance, including guidance material, guidelines and technical criteria may be issued from time to time to assist planning authorities and decision-makers with implementing the policies of the Provincial Planning Statement. Information, technical criteria and approaches outlined in provincial guidance are meant to support implementation but not add to or detract from the policies of the Provincial Planning Statement.” Specifically, the policies of the PPS, 2024 refer to provincial guidance related to population and employment growth forecasts.

Previous submissions

In 2024, staff provided comments to a variety of ERO postings related to the PPS, PPS transition and forecasting:

- [Environmental Registry of Ontario Posting 019-8369](#) “Forecasting, Land Supply and Planning Horizon Policies”
- [Environmental Registry of Ontario Posting 019-9065](#) “Consideration of transition of land use planning matters to facilitate the introduction of a new policy statement issued under the Planning Act”
- [Environment Registry of Ontario Posting 019-8462](#) “Forecasting, Land Supply and Planning Horizon Policies”

Comments prepared by City staff highlighted the following concerns related to population and employment forecasting, assessing housing need and projecting land need:

- While staff are supportive of the change to move towards their own forecasting of employment and population growth that reflects the City's planning objectives and vision, it will be necessary that this forecasting be coordinated with Halton Region that is responsible for delivering infrastructure services, especially since the MOF forecasts are not available by lower-tier municipality.
- At present, the MOF projections provide population forecasts only and do not include employment forecasts nor housing unit forecasts
- MOF projections are not land based and were not intended to be used for the purposes of land use planning like the ones prepared for the Growth Plan.
- the MOF projections are provided at the Census Division level only, which typically represent the geography of upper-tier municipalities. This means that lower-tier municipalities would not have access to projections that are representative of their municipal boundaries.

Current Engagement

On August 12, 2025, proposed updates to the [Projection Methodology Guideline](#) (PGM) were posted to the Environmental Registry of Ontario ([ERO number 025-0844](#)) with a 60-day commenting period (comments due by October 11, 2025).

The proposed updates to the PGM, if approved, would replace the existing 1995 PGM and other relevant guidance under the former Growth Plan. The guidelines would serve to provide provincial guidance to planning authorities on identifying population and employment forecasts and assessing the quantity of land needed over a determined planning horizon between 20 and 30 years (subsection 2.1.3, PPS 2024) to plan their communities and to support the implementation of the [Provincial Planning Statement, 2024 \(PPS, 2024\)](#).

The Province directs that municipalities shall base population and employment forecasts on the Ontario population projections published each year by the Ministry of Finance (MOF), and may modify as appropriate (based on policy 2.1.1 of the PPS., 2024). Notwithstanding PPS., 2024, policy 2.1.1, municipalities may continue to forecast growth using the population and employment forecasts previously issued by the Province for the purposes of land use planning (PPS., 2024, policy 2.1.2). The MOF does not prepare employment projections.

Under the Planning Act, Official Plans must be revised 10 years after they come into effect as a new official plan and every five years thereafter to ensure the official plan continues to align with provincial plans or policy statements, such as the [Planning Policy Statement](#), provincial interests and to address changing community needs and local priorities. Therefore, municipalities are not required to revise their long-range forecasts outside of the statutory *Planning Act* review cycle.

The proposed methodology is intended as guidance only. Municipalities retain the flexibility to adjust population, housing, and employment forecasts to prepare projections that reflect local policy conditions and context.

Proposed Projection Methodology Guideline (PGM)

The proposed guideline is organized into four main sections:

1. Establishing Municipal Population Projections
2. Developing Housing Needs Forecasts
3. Developing Employment Forecasts
4. Land Needs Assessment

Feedback

Staff are generally supportive of the guidance provided in the proposed PGM. The flexibility built into the PGM for municipalities to refine provincial projections with local data will support producing context-sensitive forecasts. By allowing the consideration of economic assumptions, local development activity, demographic shifts, and public policy considerations, the methodology helps to bridge limitations in the Ministry of Finance (MOF) projections. This flexibility is essential in preparing forecasts that reflect the unique circumstances of municipalities, where local policies and conditions play a significant role in shaping growth.

The *Planning Act* provides a balanced framework by requiring updates every five years following an amendment, or every ten years for a new official plan. This framework recognizes that while population growth trends may fluctuate annually, community land needs do not change at the same pace due to the long-term nature of land use planning. Maintaining this statutory review cycle offers stability, avoids unnecessary short-term adjustments, and ensures that forecasts remain both current and relevant. This framework recognizes that while population growth trends may fluctuate annually, community land needs do not change at the same pace due to the long-term nature of land use planning.

It is important to note that, consistent with the PMG guidance, collaboration with Halton Region, the other local municipalities, and relevant agencies will be critical. For the City of Burlington, this partnership is especially important given Halton Region no longer holds a role in growth management, having become an “Upper Tier without planning responsibilities” and the corresponding new responsibilities now placed on local municipalities. Such collaboration will be essential to ensuring coordinated and effective growth management that is aligned with infrastructure planning and investment across the Halton Region.

The Housing Needs Assessment (HNA) methodology, developed by the Government of Canada, provides a standardized framework for evaluating housing needs and is required to be updated every five years. Staff recognize that aligning the PMG with the HNA methodology would be beneficial for municipalities, as it would help avoid duplication and ensure the delivery of clear, consistent data and findings.

The proposed PMG recommends that municipalities use National Occupational Classification (NOC) data from Statistics Canada to categorize jobs by land use. However, municipal employment forecasts have traditionally relied on the North American Industry Classification System (NAICS). Staff note that, for land use planning purposes, NAICS codes are more appropriate and recommend continuing to use NAICS as the primary basis for categorizing employment. NAICS better reflects industry activity and associated land demand, and it is also the system currently used by Halton Region in the preparation of its annual Employment Surveys.

More detailed staff comments and questions regarding the proposed updates to the Projection Methodology Guideline can be found attached in Appendix A.

Next Steps

Please accept this letter as the City of Burlington's submission on ERO posting [025-0844](#). Given the short period for consultation the attached comments have not been approved by City Council. This letter will be shared with the City's Committees and Council at the earliest opportunity. Should Council determine any additional comments or refinements to these comments are required the Province will be advised at the earliest opportunity.

Sincerely,



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Community Planning Department
City of Burlington



APPENDIX A. Staff Comments and Questions

ERO Posting: Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)

[ERO 025-0844](#)

Question	Staff Comments/Questions
<p>1. What are your thoughts on the approach in the guidance:</p> <p>a. to developing municipal level population growth forecasts to the planning horizon based on Ministry of Finance population projections as required by policy?</p>	<ul style="list-style-type: none"> ○ It is helpful that the guidelines recognize some of the limitations of the MOF projections in that they are based on historical trends only. Local context, such as market conditions, local policy, development activity, and infrastructure capacity, will be critical in refining these forecasts. ○ Given that the MOF projections are at the Census Division level rather than the municipal boundary level, close communication with Halton Region and the other local municipalities and agencies will be crucial when identifying the share of population growth. ○ It is also important to acknowledge that the proposed PMG serves as guidance to assist in preparing growth forecasts and land needs assessments, and that municipalities retain the flexibility to test and modify their approaches in order to produce more context-driven projections, growth allocations, and land needs. ○ Given that the MOF population forecasts are now intended to be used as the base for calculating municipal population projections, it would be beneficial to have the MOF release

	<p>forecasts at the lower-tier municipal (CDS) level in the case where that lower-tier municipality is within an upper-tier municipality without planning responsibilities.</p> <ul style="list-style-type: none"> ○ Additionally, this work could be further supported by the MOF if the Ministry of Finance were to publish projections at the Census Division or Census Subdivision (CDS) level under three scenarios—low, reference, and high. This would provide local municipalities with greater flexibility to adjust their forecasts in response to future demographic or economic changes. ○ The recent 2025 downward adjustment to the MOF projections (approximately 10% annually) for Halton Region’s Census Division since 2023 should be carefully considered by the Ministry of Municipal Affairs and Housing (MMAH), as it may significantly affect future population forecasts. A sustained decline in projected growth increases the risk of either underestimating or overestimating actual demand, which in turn, could impact Halton Region and its local municipalities’ ability to finance hard and soft infrastructure, as well as to achieve complete community objectives.
<p>b. to identifying the amount of housing required to accommodate forecast population growth to the planning horizon?</p>	<ul style="list-style-type: none"> ○ The use of age-specific headship rates and adjustment for suppressed demand is a strong, evidence-based way to capture both current and future needs. ○ Allowing municipalities to factor in housing affordability and market choice is a positive advancement that recognizes the importance of diversity in housing supply. ○ Headship rate assumptions: Since household formation rates may change over time (e.g., due to affordability constraints, cultural shifts, or economic factors), reliance on Census-based headship rates may understate or overstate housing needs. Flexibility to adjust these assumptions based on local

conditions, trends, and other relevant information would be valuable for municipalities.

- Could the Ministry provide standardized adjustment factors or data sets (e.g., vacancy rates, ARU uptake trends, demolition/conversion estimates) to ensure consistency across municipalities?
- How should municipalities reconcile differences between local housing market trends and provincial population projections when they diverge significantly?
- The Housing Needs Assessment (HNA) methodology developed by Government of Canada provides a standardized framework for evaluating housing needs that is broadly comparable across Canada that is already being prepared by a number of Municipalities. Harmonization efforts and adjustments to the guidelines would be valuable as it would assist in preserving the integrity of data sets, enhances transparency, and allows municipalities to benchmark results against other jurisdictions. It would be beneficial for municipalities if the PMG were adjusted to align with the HNA's methodology. Such alignment would help avoid duplication, provide clear and consistent data and findings.
- Under the former Growth Plan, municipalities were required to plan for housing needs (including affordable housing) based on the Regional Market Area to ensure an appropriate mix of housing. Under the PPS (2024) and the new PMG, municipalities are similarly expected to consider the Regional Market Area in order to provide a broad range and mix of housing options for current and future residents. In Halton, this work was previously undertaken by the Region within the Region's evolving role as an "Upper Tier without Planning Responsibilities" a possible gap has been created in assessing the Regional Market Area and the associated

	<p>appropriate range and mix of housing. In light of new local planning responsibilities, effective collaboration across local municipalities will be necessary to ensure consistency and alignment at the regional level. Further guidance from the Province on how to incorporate the Regional Market Area into local forecasts would be helpful.</p>
<p>c. to identifying the amount and type of employment growth to the planning horizon?</p>	<ul style="list-style-type: none"> ○ The proposed guidance for developing municipal-level employment growth forecasts establishes a useful framework, and staff are generally supportive of the PMG’s guidance. The flexibility to consider local conditions is particularly valuable, as it allows municipalities to account for the unique circumstances and local policy when preparing forecasts. However, adjusting forecasts to reflect key influencing factors—such as planned future business investments and infrastructure development, labour market policies and demographic trends, changes in industrial composition, and international market conditions will inform the preparation of context sensitive employment projections. ○ The MOF projections do not include employment growth forecasts, which may lead to inconsistencies and differing approaches across municipalities due to data limitations. ○ According to the PMG’s emphasis on accommodating employment through intensification and assessing land capacity, additional direction will be helpful on how municipalities should evaluate land capacity for intensification purposes. ○ Municipalities have traditionally relied on the North American Industry Classification System (NAICS), which classifies jobs by industry, this better aligns with land use planning. While NOC data provides useful insights into workforce skills and training needs, it is less effective for land use planning as it

	<p>does not directly link occupations to land use requirements. It would be helpful for the City of Burlington if NAICS data remained the primary basis for employment growth forecasts, as it better reflects local businesses and economic context by classifying business establishments by industry such as manufacturing, retail, logistics, offices, etc. It is important that municipalities retain the flexibility to use local Employment Survey data (that are compiled based on NAICS codes) to refine and validate the findings of employment growth forecasts.</p>
<p>d. to determining the amount of land needed to accommodate forecasted population and employment growth to the planning horizon?</p>	<ul style="list-style-type: none"> ○ Data and assumptions: Calculating gross-to-net land needs requires detailed local data (on infrastructure, parks, roads, ARUs, etc.), which smaller municipalities may not have. ○ General Employment uses: Since the MOF projections do not provide employment growth, methodologies for estimating General Employment land needs remain less clear, which could risk under- or over-estimating demand outside Employment Areas. ○ It may be helpful for the Ministry to provide clear criteria for when each of the three methods should be applied (e.g., population thresholds, municipal size, geography)?
<p>2. Are there additional resources, tools, or information that you think would be helpful to support implementing the guidance?</p>	<ul style="list-style-type: none"> ○ Population & Employment Scenarios: Low, reference, and high projections at the Census Division (Region) and Census Subdivision (municipal) level, to better capture uncertainty. ○ Employment Data: Clarified links between NAICS industry sectors and General Employment and Employment Land Employment forecasts. ○ Density Benchmark Library: A database of people + jobs per hectare ranges (gross and net), tailored to settlement types (BUA, DGA, etc.).