

October 10th, 2025

**Submitted online and via email to [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)**

Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
13th Floor, 777 Bay St  
Toronto, ON M7A 2J3

**RE: Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024).**

The City of Guelph (the "City" or "Guelph") appreciates the opportunity to provide feedback on the proposed updates to the Projection Methodology Guideline, as outlined in Environmental Registry of Ontario posting 025-0844. Below are the general comments and feedback from the City of Guelph regarding the proposed new guideline:

## **Overview:**

The [Provincial Planning Statement, 2024](#) (PPS 2024) requires municipalities/planning authorities to develop population and employment growth forecasts for their communities, and, at the time of creating or updating an official plan, to allocate sufficient lands to meet these projected growth needs for a 20-30 year horizon. Municipalities have been required to use the 1995 Projection Methodology Guideline to determine growth forecasts for planning purposes, and with this document turning 30 years old, the Ministry is looking to update this methodology to support the implementation of the PPS 2024.

## **Overall comments**

The City of Guelph supports the flexibility to account for local development factors and planning context in implementing the projection methodology guidance, such as infrastructure capacity, local economic conditions, and other local market factors. This will help to ensure that the methodology is implemented in a meaningful manner that respects local context.

Having just completed a comprehensive update to its growth management strategy, The City of Guelph used a similar approach as the proposed projection methodology to determine the land needs to support projected growth to 2051. This growth management strategy has only been in effect since May of 2024. The updating and development of growth management strategies require considerable municipal resources and leads to significant financial implications for municipalities. It would be helpful if the Province could assist municipalities with costs associated with

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updating their growth management strategies to align with the projection methodology guideline at the time of their next Official Plan review.

While not included for consultation, the proposed projection methodology guideline states that it is anticipated that the final version of the guidance could include hypothetical scenarios to show how planning authorities could implement the methodology. Including hypothetical scenarios in the final version of the projection methodology would be helpful in achieving the goals identified in the guidance which aim to standardize the approach to growth planning and ensure consistency across the province.

## **Response to questions**

### **1. What are your thoughts on the approach in the guidance to developing municipal level population growth forecasts to the planning horizon based on Ministry of Finance population projections as required by policy?**

#### **Response:**

The Proposed Projection Methodology Guideline directs municipalities to base their population forecasts on the population projections provided by the Ministry of Finance. These population projections are extrapolated based on historical trends and do not factor in future known or planned factors, both on a macro and micro scale that would impact growth. Some of these factors may include changes to economic conditions, housing market conditions, major employment expansions or closures, or infrastructure constraints or expansions that would directly impact growth. The proposed methodology does provide the flexibility that enables municipalities to adjust their population forecasts based on these local factors, which the City of Guelph supports.

#### **Recommendation:**

That the final projection methodology guideline continues to allow the flexibility for municipalities to refine their population forecasts based on known or planned factors influencing growth throughout the planning horizon of their Official Plans.

#### **Response:**

The Ministry of Finance population projections are provided at the Census Division level. The City of Guelph is a single-tier municipality located within a census division that is geographically aligned with Wellington County. As a single-tier municipality, the City of Guelph is an independent planning authority, responsible for preparing and implementing its own Official Plan. However, because the base population projections are only available at the Census Division level, this does introduce additional complexity for single-tier municipalities, such as Guelph, which must disaggregate the population from county-level projections to have a locally accurate and relevant forecast. This concern is consistent with the feedback provided during the consultation for the original Growth Plan for the Greater Golden Horseshoe, which similarly

offered population forecasts only at the county level, making population forecasting difficult, and limiting both their accuracy and usefulness for single-tier municipalities. As well, the proposed projection methodology encourages a coordinated approach among municipalities and other public service partners to disaggregate the Ministry of Finance population projections at the time of their next Official Plan update, this approach presents some challenges for single-tier municipalities, such as the City of Guelph.

A few of these challenges include:

- Timing misalignment of Official Plan updates between the City of Guelph and Wellington County could hinder effective coordination and disaggregation of the Ministry of Finance population projections if the County and the City are not updating their Official Plans concurrently. Without synchronized planning timelines, municipalities may struggle to align their forecasts with neighbouring jurisdictions, potentially leading to inconsistencies in growth planning.
- The proposed projection methodology encourages municipalities to use the most recent population projections from the Ministry of Finance. These projections are updated annually, which may further complicate the process in jointly disaggregating the population projections between upper- and single-tier municipalities.
- The projection methodology guideline is proposed to allow for a range of planning horizons between 20 and 30 years. Municipalities working from different Ministry of Finance projection horizon years may face further challenges in aligning their population forecasts, making it more difficult for upper- and single-tier municipalities to collaborate and achieve a consistent approach if population horizons do not align.
- The City of Guelph is the largest community in Canada that relies almost entirely on groundwater for its water supply. This water supply is finite and Guelph has identified that the city may face long-term water supply challenges beyond 2051 if the city is to rely solely on its existing wellheads. As a result, this may limit Guelph's ability to accommodate additional growth beyond 2051. This has the potential to delay or complicate discussions when coordinating with Wellington County to disaggregate the Ministry of Finance population projections for the City of Guelph. Given the City of Guelph's water supply constraints, Guelph's requirement for city-level data is imperative to accurately evaluate present residential and other customer water demands and stretch present resources through water demand management programs including efficiency and optimization in use, meeting our Permit to take Water obligations across our 21 active groundwater wells. City-level data provides the granularity necessary to develop per capita demand forecasts for master planning purposes, and allows for appropriately planning and staging water and wastewater treatment infrastructure which are important to maintain capacity and meet projected local growth. Lastly, City-level data ensures alignment with and furthers the need for Grand River Source Protection plan draft water quantity policies which recognize that consumptive water taking is a significant drinking water threat in the

Wellhead Protection Area- Quantity, of which the City of Guelph is located within.

**Recommendation:**

That the Ministry of Finance population projections be provided at both the upper- and single-tier municipal level. Although the proposed methodology enables municipalities to adjust their forecasts based on local factors, providing population projections at both the upper- and single-tier municipal level would ensure a more efficient, locally accurate, and relevant forecast.

**Response:**

The proposed projection methodology promotes a coordinated, integrated, and comprehensive approach among municipalities and other public sector partners when disaggregating population forecasts. For the City of Guelph, which is an independent, single-tier planning authority, this would require collaboration with Wellington County to jointly disaggregate and allocate the population projections between the two jurisdictions. While the proposed approach supports local flexibility, it also introduces additional complexity in ensuring alignment and consistency across planning authorities.

**Recommendation:**

That the Ministry of Finance provides population projections for both upper- and single-tier municipalities to support more streamlined, efficient, and reliable population forecasts.

**2. What are your thoughts on the approach in the guidance to identifying the amount of housing required to accommodate forecast population growth to the planning horizon?**

**Response:**

The City of Guelph generally supports the proposed framework for developing housing needs forecasts over the planning horizon. This framework enables municipalities to account for local housing factors, such as household formation rates, suppressed household formations, vacancy rates, housing stock changes resulting from demolitions, intensification, and other local market contingency factors to forecast housing needs. It further includes a provision for municipalities to establish minimum targets for housing that is affordable for low- to moderate-income households. The recommended inputs will help to best determine housing needs and demand by age cohort and income level to suit the needs of communities.

**Recommendation:**

That the final version of the projection methodology continue to provide the ability for municipalities to have the flexibility to account for local factors in developing their local housing forecasts.

**Response:**

The proposed methodology directs municipalities to identify their housing needs by density typology. Density typologies can be interpreted differently

across municipalities. For example, what qualifies as a medium density development in Toronto may involve different housing typologies in the City of Guelph. If the goal of the proposed methodology is to standardize forecasts across the province and support a range of housing options, a methodology that identifies housing typologies or density ranges for what constitutes low, medium, and high density would result in a more standardized approach.

**Recommendation:**

That the housing forecasts be based on defined housing typologies, or density ranges to support standardized housing forecasts across the province and the goals of the Provincial Planning Statement in promoting a full range of housing options.

**3. What are your thoughts on the approach in the guidance to identifying the amount and type of employment growth to the planning horizon?**

**Response:**

The City of Guelph is generally supportive of the proposed framework in developing their employment forecasts, providing municipalities with the flexibility to consider local data and other local employment factors when establishing the amount and type of employment growth to be accommodated over the planning horizon. This approach supports the development of a more accurate employment forecast and corresponding land needs. This flexibility is equally as important when categorizing the forecast jobs by land use under employment step 3, as it enables municipalities to adjust their job structures and provision of jobs within each land use category based on local factors such as market disruptions, economic shifts, and infrastructure investments. While it's important to remain flexible when forecasting employment targets to respond to market changes and economic disruptions, this flexibility should be exercised in close collaboration with Economic Development staff. Their insights, often anecdotal or qualitative in nature, and may not be fully reflected in planning-led data-driven planning analysis alone.

**Recommendation:**

That the final version of the projection methodology guideline continue to provide municipalities with the flexibility needed to consider local conditions that will allow for more accurate employment forecasts when implementing the methodology.

**Response:**

The proposed methodology guideline recommends using the National Occupation Classification (NOC) data to inform the classification of jobs by land use category under employment step 3. However, the methodology does not mention utilizing North American Industry Classification System (NAICS), which is best suited for estimating land needs associated with municipal employment forecasts. The City of Guelph has adopted NAICS-based employment planning to better align its employment forecasts with land requirements, resulting in more accurate land budgets. It is much more

difficult to forecast land requirements for employment based solely on NOC, which classifies jobs by occupation, rather than by industry, and is better suited for labour market forecasts. Forecasting land requirements by NOC would require aligning occupations with industry types to understand land requirements.

**Recommendation:**

To better assist municipalities with understanding future employment land needs, the City of Guelph requests that the final version of the projection methodology guideline also direct or enable municipalities to utilize North American Industry Classification System (NAICS) when implementing the projection methodology to ensure closer alignment with local practice.

**Response:**

The City of Guelph supports the inclusion of employment surveys as a potential data source in the projection methodology to support and inform municipal employment forecasts. However, the City of Guelph, along with many other municipalities conduct their employment surveys by North American Industry Classification System (NAICS), rather than National Occupation Classification (NOC), which cannot realistically be collected through an employment survey. For this reason, data collected through employment surveys may have limited value as a potential data source.

**Recommendation:**

That the final version of the projection methodology guideline document enable municipalities to forecast employment land needs using the North American Industry Classification System (NAICS).

**Response:**

The proposed projection methodology places emphasis on municipalities to accommodate jobs through intensification of existing employment uses through the redevelopment of underutilized lands within the built-up area. The methodology states that municipalities should rely on recent building permit data and development applications, however, intensification of existing employment uses is very context specific and past patterns will not necessarily represent future growth. To implement the methodology, it appears this would require municipalities to understand the location, timing, type, and quantum of employment that would result from intensification. Given that employment development patterns are highly variable and are influenced by a number of external factors, demonstrating how future employment will be accommodated through intensification will be challenging for municipalities.

**Recommendation:**

That the final version of the methodology include an option for municipalities to apply a factor or percentage of future employment that will be accommodated through intensification.

**4. What are your thoughts on the approach in the guidance to determining the amount of land needed to accommodate forecasted population and employment growth to the planning horizon?**

**Response:**

The City of Guelph supports the flexibility of determining land needs based on one of three methods, provided that local density assumptions can be applied. The recommendation that multiple methods be used to test scenarios and compare results to ensure there is not an oversupply or undersupply of land is also supported.

**Recommendation:**

That municipalities continue to be provided with the flexibility to use local assumptions in determining their land needs.

**5. Are there additional resources, tools, or information that you think would be helpful to support implementing the guidance?**

**Response:**

Since much of the data required to support the implementation of the guidance relies heavily on custom tabulations from Statistics Canada, it is recommended that the Province provide the required data to municipalities. This would help to ensure consistency, minimize errors in the data requests, reduce costs for municipalities and the overall workload on Statistics Canada.

**Recommendation:**

That the Province assist municipalities with the purchase of the required custom datasets to support the implementation of the projection methodology and reduce overall costs and minimize errors.

## **Closure**

We appreciate this opportunity to provide input on these changes. Should you have any questions about the feedback provided, or require additional details please do not hesitate to contact the City at [intergovernmental.relations@guelph.ca](mailto:intergovernmental.relations@guelph.ca).

Sincerely,

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