



Sent by Email

October 9, 2025

The Honourable Rob Flack
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, Ontario
M7A 2J3

Subject: Proposed Updates to the Projection Methodology Guideline to Support the Implementation of the Provincial Planning Statement, 2024
- Comments from the City of Pickering – ERO Posting 025-0844
File: L-1100-065

The City of Pickering is pleased to provide comments in response to the Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024.

The City recognizes and appreciates that the Proposed Projection Methodology Guideline will provide municipalities the flexibility to test and modify their approach and ultimate population, housing, and employment projections based on local considerations and circumstances. Hopefully, this will result in more accurate projections that better reflect the needs of individual communities, including Pickering.

While the Proposed Projection Methodology Guideline offers more flexibility to municipalities, the proposed changes result in downloading significant work to lower-tier municipalities. In addition to downloading additional work, which will require increased municipal resources, the proposed system and methodology introduce new concerns, including challenges for infrastructure funding, increased cost to housing, and increased opportunities for appeals.

Please find the City of Pickering's detailed comments enclosed.

Yours truly

A handwritten signature in black ink, appearing to read "Catherine Rose". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Catherine Rose
Chief Planner

BW:nr

Enclosure: City of Pickering Detailed Comments on the Proposed Updates to the Projection
Methodology Guideline

Copy: Chief Administrative Officer
Director, City Development & CBO
Manager, Policy & Geomatics

ERO Posting 025-0844 (Closing October 11, 2025) Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)	
Concerns with Proposed Projection Methodology Guideline	City of Pickering Comments
New Planning Framework and New Proposed Methodology and Increased Municipal Resources	<p>In the absence of the population and employment projections provided by the Province (through the Growth Plan), and the removal of planning authority from the Region of Durham, lower-tier municipalities will be required to set projections.</p> <p>Chapter 6 of the Proposed Methodology Guideline emphasizes the need for collaboration between lower-tier and upper-tier municipalities, as well as with other orders of government, agencies, boards, to achieve the outcomes at all steps of the forecasting and land needs assessment process and ultimately implement the relevant P.P.S., 2024 policies.</p> <p>While Pickering does not disagree with collaborating on growth within the Region with neighbouring municipalities and agencies, this was the framework that was previously in place through Regional Official Plan Reviews.</p> <p>Municipalities will now be required to increase in-house resources to include expertise in land economics or increased financial resources to hire consultants to undertake this work, while being required to re-establish working groups that previously existed with the same stakeholders.</p>
Requiring Lower-Tier Municipalities to Conduct Regional Growth Planning	<p>In addition to requiring more resources for lower-tier municipalities to undertake Official Plan Reviews, there are a number of additional concerns:</p> <ul style="list-style-type: none"> • Not all lower-tier municipalities will undertake Official Plan Reviews at the same time. This can make collaboration more difficult. • There is no requirement for all lower-tier municipalities to use the same method or final projections, despite collaboration. As each municipality is required to justify their approach and final numbers there could be differences within a Census Division. This may lead to less accurate growth projections within a Census Division and not aligning with the Region’s growth forecasts. • If all lower-tier municipalities do not use the same method within the Census Division or do not align with Regional growth forecasts, it could create additional challenges and/or competition between municipalities for Regional Infrastructure that support growth. These services include

	<p>water and sanitary services, ambulance and police services, transit services, affordable housing, etc.</p> <p>Recommendation</p> <p>Future updates to the Ministry of Finance population projections should consider constraints and opportunities for population growth, and include household and employment forecasts, allocated to the area municipal level of geography.</p>
<p>Additional Cost for Housing</p>	<p>Growth-related studies are permitted to be funded by Development Charges, per the <i>Development Charges Act</i>.</p> <p>It is anticipated that the changes from Provincially provided population and employment forecasts, the removal of the Region of Durham’s planning authority for growth management, and the proposed changes to the Projection Methodology Guideline will result in additional costs for municipalities when undertaking Official Plan Reviews.</p> <p>The additional costs of Official Plan Reviews associated with growth forecasts and land needs assessments will increase the costs of growth-related studies. These additional costs will be reflected in future Development Charge By-laws, translating into an additional cost to new housing.</p>
<p>Appeals of Population and Employment Projections</p>	<p>Existing Framework</p> <p>Currently, the <i>Planning Act</i>, in Section 17.(24.5(b)), prohibits appeals of population and employment forecasts that were identified through Places to Grow, which were based on Ministry of Finance projections.</p> <p>Municipalities will continue to use Ministry of Finance projections through the proposed methodology but will be responsible for identifying overall population and employment forecasts.</p> <p>Recommendation</p> <p>The City recommends amending the <i>Planning Act</i> to prohibit appeals of population and employment forecasts, and the resulting land needs assessments, completed by municipalities when following the new methodology.</p> <p>As outlined above, additional municipal resources will be required to undertake population and employment projections moving forward. Provided that municipalities follow the Projection Methodology Guideline, the resulting population and employment forecasts should not be appealable. Allowing appeals would add additional cost and time to Official Plan Reviews, and could impact the delivery of future land for jobs and housing and the delivery of employment and housing projects.</p>