



October 10, 2025

Provincial Land Use Plans Branch  
13th Floor, 777 Bay St  
Toronto, ON, M7A 2J3

**Re: Comments on the Proposed Updates to the Projection Methodology Guideline to Support the Implementation of the 2024 Provincial Planning Statement**

The proposed updates to the Projection Methodology Guideline (PMG) are intended to aid municipalities in developing population and employment forecasts to then identify the quantity of land needed over a 20-to-30-year planning horizon. The primary focus of the guidance material is to establish the quantum of land required to accommodate housing and employment need rather than identifying the location of new urban expansions. These comments are being offered as the City of Niagara Falls' formal response to the proposed PMG as posted on the Environmental Registry of Ontario.

Municipal Population Projections

As opposed to the former Provincial Growth Plan, municipalities are to now base population and employment forecasts on Ontario population projections published annually by the Ministry of Finance (MOF). City staff note that from year to year, the MOF forecasts can fluctuate considerably. For example, Niagara Region's new 2051 population target (as of August 2025) is 689,016 people, a decrease of 33,984 people from the 2024 target of 723,000 identified in the 2024 MOF forecast. Depending on what year a municipality uses for its 2051 planning horizon, it may greatly impact an individual municipality's population projection and ultimately its requirement for the land needed to accommodate that population. The reliance on the MOF forecasts and their ability to fluctuate from year to year does not provide a consistent baseline and is therefore a concern when trying to plan for land use and infrastructure. While fertility, mortality and migration rates are primary inputs into the MOF projections, planning and economic factors have been excluded, and this is a limitation of the PMG.

To address the population allocation process, the proposed PMG offers two methods with the first method (i.e. population share) based on a municipality's current population share of the Census Division (i.e. Niagara Region). The second method (i.e. growth share) is based on a municipality's share of population growth within the Census Division over the last 10 years. City staff note that these two methods can generate widely different outcomes, particularly in cases where a municipality has experienced a high rate of population growth over the past 10 years compared to the average population growth rate of the Census Division. In the Niagara context, there have been

a few municipalities that witnessed strong population growth in the last decade due to land availability but would not be a notable growth centre going forward. Under the growth share scenario, this type of municipality may receive more population growth than it can reasonably absorb while potentially leaving municipalities that may be able to absorb future growth short.

If each municipality were to use the upper range in assigning their respective population growth allocations, the total 2051 population forecast would be considerably higher than the original MOF population projections for the Census Division. In the Niagara context, City staff have been informed by Niagara Region staff that if all twelve municipalities were to use their upper range in determining their population growth allocations, the new 2051 Niagara Region population number would be 862,000 people, which is 172,984 people (25%) above the 2025 MOF population projection (689,016) for Niagara Region by 2051.

The MOF projections do not reflect prior or planned infrastructure investments as contained in Regional or local municipal TMPs and MSPs, economic development strategies or the established regional planning growth framework. From an infrastructure perspective, an overly zealous population forecast may result in the overbuilding of infrastructure in certain locales for a population that may never arrive. In the end, if the Province continues to proceed with MOF projections, these may be used as a baseline, but municipalities should also be allowed to cross reference existing local municipal growth forecasts that were developed to reflect infrastructure and servicing realities.

Finally, the proposed PMG emphasizes flexibility, which is intended to reflect local municipal conditions, however City staff note that this flexibility may also create challenges in terms of consistency across municipalities. The Province will need to provide guidance material with respect to this matter.

### Municipal Employment Projections

Whereas the former Provincial Growth Plan prepared employment forecasts for upper and single tier municipalities of the Greater Toronto and Hamilton area, the Ministry of Finance forecasts simply do not, which is a major shortcoming of the proposed PMG.

The PMG does require municipalities to forecast employment using a municipal activity rate (jobs/population) with jobs categorized into rural employment, employment land employment and general employment with the general employment category capturing commercial, institutional, retail, tourism and work from home employment. The number of job categories have been streamlined and the introduction of the general employment category is forward thinking, as it recognizes employment growth in non-traditional areas such as home-based work. Though municipalities may plan beyond the planning horizon, as stated in Policy 2.3.1 of the PPS, City staff would appreciate the development of an employment forecast by the Province as this would reflect the Provincial economic strategy and the ability of an upper tier municipality to provide the required municipal servicing.

### Housing Needs Forecasts

The proposed PMG directs municipalities to convert projected population into households using headship rates by age cohort, then adjust for affordability, suppressed household formation, vacancy rates, and market contingencies.

No technical benchmarks or formulas are provided in the PMG for applying these adjustments (affordability, vacancy rates, suppressed households) which may then create inconsistent interpretation. As such, the Province should develop standard technical guidance material for applying these adjustments while allowing municipalities to supplement the guidance material with available local data originating from consistent credible sources.

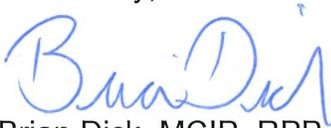
### Land Needs Assessment

The proposed PMG provides three methods for municipalities to determine land needs: 1) people and jobs per hectare, 2) multiple densities by unit/job type, and 3) a simplified method for smaller municipalities with all three methods relying on density assumptions and adjustments to estimate land needs.

Unlike the 2020 Land Needs Assessment (LNA) Methodology, the PMG does not provide provincial benchmark ranges for housing and employment forms. Similar to the 2020 LNA, the Province should include benchmark density ranges for housing and employment forms, while allowing municipalities to refine assumptions with available local data.

It is also unclear how the terms net density, gross density, and developable area are consistently applied across the three methods. Though some explanation has been included, additional clarity, illustrations, and glossary definitions would be of assistance to help ensure consistency in application.

Yours truly,



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