
October 10th 2025

Province of Ontario – Ministry of Municipal Affairs and Housing

Re: Proposed Updates to the Projections Methodology Guideline to Support the Implementation of the Provincial Planning Statement, 2024 (PPS, 2024).

Thank you for the opportunity to review and comment on the Environmental Registry of Ontario (ERO) posting 025-0844 regarding the proposed updates to the projections methodology guideline to support the implementation of the Provincial Planning Statement 2024 (PPS, 2024). The Ministry of Municipal Affairs and Housing (MMAH) is seeking feedback on proposed guidance to assist planning authorities with establishing population and employment forecasts and identifying related land needs requirements to plan their communities. These new guidelines would replace the 1995 Projection Methodology Guideline used throughout Ontario, as well as the Land Needs Assessment Methodology which applied to all municipalities within the Growth Plan for the Greater Golden Horseshoe. The ultimate policy goal of the PPS 2024 is to align population and employment growth forecasts for land use planning with the projections from the Ministry of Finance. The County of Simcoe and surrounding areas are expected to experience significant growth over the next 25 years and responsibly planning for schools within these communities will help support sustainable communities across the region. As a legislated commenting agency, the Simcoe County District School Board (SCDSB) would like to offer the following feedback from a school board planning perspective.

The new guidelines generally consist of four key technical elements followed by an outline of best practices to assist with implementing the guidelines: Establishing Municipal Population Projections, Developing Housing Needs Forecast, Developing Employment Forecasts, and Completing a Lands Needs Assessment. Following the completion of the Lands Needs Assessment in 2022, SCDSB provided comments to Simcoe County and the various municipalities across the County on the number of elementary and secondary schools and associated lands needs for each panel that would be required to meet the enrolment pressures from the allocated population growth. The Lands Needs Assessment work completed for Simcoe County include many similar aspects outlined in the proposed updated methodology and therefore the board does not expect there to be much discrepancy between the two methods. A primary note of concern for the school board is that lands needs for schools are not being considered as a separate lands needs requirement in this process. School land needs should not be categorized as developable areas required to reach targeted population and employment numbers. As such, planning staff would expect that school land needs are set aside separately for the required future schools across Simcoe County. Under the Provincial Policy Statement, 2024, schools are recognized as Public Service Facilities and section 2.3.1.3 speaks to planning authorities supporting the achievement of complete communities by prioritizing planning and investment in the necessary infrastructure and public service facilities. A key component of comprehensive

planning involves a coordinated and integrated approach across multiple levels of government. Identifying the lands needs required to accommodate the pupils that will result from forecasted population across Simcoe County is a part of the comprehensive planning that should be completed at this stage of the proposed updates to the projections methodologies. This will ensure that all parties understand that school land needs are separate from residential and employment developable land allocations across the County. Section 6.2.4 of the PPS speaks to the need for planning authorities and school boards to collaborate in order to facilitate early and integrated planning for schools and associated childcare facilities to meet current and future needs in the communities. In seeking to fulfill provincial policy, SCDSB planning staff are highlighting the need, early in this updating process, that a separate analysis should be completed to determine school lands needs across the County to ensure planning for schools and the associated child care facilities are not an afterthought but at the forefront of sound planning, ensuring the establishment of complete communities.

With the Province seeking to update the projection methodology guidelines in order to implement the PPS, 2024, the need for coordinated planning that accounts for the lands needs required to support future school needs is essential to ensure functioning and resilient neighborhoods. The board's aim with the comments provided in this letter is to provide clarification with regards to the essential provision of schools in these communities as growth unfolds to ensure that every student has access to quality education.

Should you require additional information, please do not hesitate to contact this office.

Sincerely,



Carina Nunes, BES
Planner
Simcoe County District School Board