

Ministry of Municipal Affairs and Housing

Provincial Land Use Policy Branch
 777 Bay Street
 Toronto, ON M7A 2J3

October 9, 2025

Re: ERO 025-0844 – Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)

The City of Mississauga (the “City”) has reviewed the proposed changes shared through the above listed registry posting and would like to provide the following comments and suggestions for your consideration.

Description of Changes and Comments to the Province

Summary of Proposed Changes	Comments on Potential City Impacts / Comments and Questions to the Province
<p>Ministry of Finance (MOF) Population Projections</p> <p>Planning authorities must use MOF population projections as the basis of growth forecasts.</p>	<p>The guidance document states a major update to the MOF population projections will occur after the next Census through a consultation process with “ministries, upper-tier municipalities, and academic demographers”. The City asks the Province to consider inviting the City and other lower-tier municipalities with planning authority to participate in consultations at the next major update.</p> <p>While MOF population projections provide important insights regarding anticipated demographic changes (e.g., births, deaths, migration changes, etc.) by census division (CD), these projections are not designed for land use or infrastructure planning, as they do not consider local or regional land use policies, servicing investments, or economic development factors. These limitations are acknowledged by the MOF. The City recommends the Province consider a more comprehensive forecasting base at the CD level to also include employment forecasts.</p> <p>Further, the City would like clarification as to how annual MOF population projections should be used when preparing forecasts for an official plan review or update. Planning processes can span several years, yet MOF projections are updated annually and may vary significantly from year to year. This may lead to variation in the preparation of forecasts and land needs assessments, especially when multiple lower-tier municipalities with planning authority are determining their respective shares of a CD population projection.</p>

	<p>There is a risk that each lower-tier municipality within a CD could use a different MOF projection based on the timelines of their official plan review processes.</p> <p>Finally, the City would appreciate clarification as to how Statistics Canada’s population estimates inform the MOF’s CD-level population projections.</p>
<p>Municipal Population Projections</p> <p>Lower-tier municipalities with planning authority (e.g., census subdivision (CSD)) are responsible for determining their share of the MOF population projection for the CD. Two methods are offered to determine the CSD’s respective share of the projected population.</p>	<p>The proposed methods for determining a municipality’s respective share of projected population by CD has the potential to generate varying outcomes. This is particularly true where a municipality has experienced notably higher population growth over the past ten years compared to the average population growth rate for the CD.</p> <p>To address this concern, the City encourages the Province to prepare and publish population projections for CSDs during at least every major update to the MOF population projections (e.g., every five years). The City also asks the Province to clarify if the sum of the CSD projections should equate to the total population for the CD.</p> <p>Furthermore, the Province has suggested the final version of the guidance document could include hypothetical scenarios. The City suggests including a scenario involving an upper-tier municipality and lower-tier municipality with planning authority (specifically, large and fast-growing municipalities).</p> <p>In addition, the City encourages the Province to include direct links to required data sources in both the guidance document and through a centralised web portal to ensure municipalities use consistent data sources.</p>
<p>Employment Forecasting – Step 1</p> <p>Municipalities are recommended to use activity rate to calculate projected employment needs.</p>	<p>Activity rate may not be an appropriate metric to use for some municipalities in the Greater Golden Horseshoe (GGH) as residents often commute to other municipalities for work. Mississauga, for example, is a net importer of jobs, meaning the number of jobs in Mississauga exceeds the number of employed residents. This means that the number of people commuting into Mississauga for work exceeds the number of employed residents living in the city.</p>
<p>Employment Forecasting – Step 3</p> <p>Municipalities are no longer required to structure forecasts into four land use categories. Instead, municipalities are recommended to categorize the employment forecast into three land use categories, with the option of reducing or adding sub-</p>	<p>Previously, municipalities were to categorize the employment forecast into at least four land use categories, including Major Office. Office uses are now to be included as part of the General Employment (GE) category. The proposed change reflects the new definition of an employment area in the PPS, 2024. However, in urban cities such as Mississauga, with an existing concentration of Major Office employment, the Major Office category has significant weight in the calculation of the newly classified GE land needs.</p> <p>The City suggests that the Province includes clarification and direction regarding the incorporation of Major Office</p>

<p>categories based on local conditions.</p>	<p>jobs within the GE calculations. At the same time, the guidance document should give planning authorities flexibility to include a Major Office category.</p>
<p>Employment Forecasting – Step 3</p> <p>Planning authorities are recommended to use the National Occupation Classification (NOC) to help classify jobs by land use category.</p>	<p>The City encourages the Province to revise the guidance document to recommend use of the North American Industry Classification System (NAICS) in addition to or in lieu of NOC data. Employment forecasts have historically been informed by NAICS.</p> <p>There is a conceptual difference between NAICS (industry classification) and NOC (occupation classification). Businesses with different industrial classifications can employ individuals performing the same job. To understand the amount and type of employment land needed, it is important to understand the classification of industries occurring on site (e.g., NAICS). Relying on NOC may limit planning authorities’ ability to translate employment into land use categories, since NOC focuses on job functions rather than the specific land use requirements of an industry.</p> <p>The City also uses NAICS for business and employment classification as part of the annual employment survey. Several other municipalities also collect employment information and use this classification system, which facilitates cross-jurisdictional comparison.</p>
<p>Land Needs Assessment</p> <p>The guidance document does not require planning authorities to use one standard method to calculate land needs based on density targets and conformity with provincial plans. Three methods are provided, and planning authorities are recommended to use at least one of three methods (or a combination of the three), based on available data and local conditions.</p>	<p>The guidance document offers planning authorities greater flexibility in the method(s) used to calculate land needs. Previously, planning authorities in the GGH had to follow provincial guidance, with a focus on achieving density targets and conformity with provincial policy. The City seeks clarification or guidance from the Province regarding whether municipalities with planning authority within a CD should use the same method(s) to calculate land needs.</p> <p>Staff have previously commented on changes to provincial policy that fundamentally shifted the way growth planning occurs. This includes the elimination of intensification targets. The City recommends the Province include clearer direction in Chapter 5: Land Needs Assessment regarding the location of forecasted units and jobs. There is an opportunity to link the methodology to policy direction in the PPS, 2024 prioritizing growth through intensification, for example. Furthermore, it is unclear what level of detail is needed to translate those housing needs into the net residential land area to calculate the land needs.</p> <p>It is therefore recommended that the Province reincorporate direction on intensification targets as well as density target ranges for greenfield areas, while allowing municipalities to refine targets and assumptions based on local policies and data.</p>

	<p>Finally, it is recommended that the glossary in the guidance document provide definitions for net and gross density, developable lands, and specify the components that should be excluded when calculating the net to gross land needs. The guidance document should also indicate how the environmental features and major infrastructure should be considered when calculating net land needs.</p>
<p>Implementation</p> <p>Collaboration and dialogue between lower-tier municipalities with planning authority and upper-tier municipalities is encouraged while preparing land needs assessments. However, a formal mechanism for collaboration (e.g., municipal comprehensive review) no longer exists.</p>	<p>The City acknowledges the intended flexibility of the guidance document, using language such as “recommended” or “suggested” in reference to steps and methods. Flexibility in the methodology could allow different municipalities to conduct their land needs assessment based on local land needs and data availability.</p> <p>Bill 23 shifted land use planning authority from some upper-tier municipalities to lower-tier municipalities. The guidance document encourages upper- and lower-tier municipalities to work collaboratively together to establish and monitor growth forecasts and the supply of land. Strong collaboration and communication will be needed to coordinate land needs assessments in CDs with multiple CSDs.</p> <p>Previous guidance documents included a subsection on engagement with provincial staff. Upper- and single-tier municipalities were invited to engage the Province at various stages of the land needs assessment. It is recommended that this section be carried forward in the guidance document to ensure consistency with provincial policy and coordination among upper and lower-tier municipalities.</p> <p>Further, the guidance document should provide additional direction on how upper- and lower-tier municipalities should reconcile forecasts and land needs assessments to ensure consistency and support efficient and sustainable infrastructure investments at the regional level.</p>

If you have any questions or require additional information, please contact Nadia Dowhaniuk, Planner at (905) 615-3200 ext. 5541.

Sincerely,



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