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

To Whom It May Concern:

Thank you for the opportunity to comment on the Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024. Under the current methodology, local specifics, land use policies and provision of infrastructure that account for differences between municipalities are considered. Historically, Peel Region would complete a forecasting exercise using projections at the Census Division (CD) level and distribute them to its lower-tier municipalities through a collaborative process, based on local contexts, and with regional infrastructure servicing availability/feasibility evaluated.

The proposed methodology assigns responsibility for CD distribution to Census Subdivision (lower-tier level) to Planning authorities (lower-tier municipalities) and it allows for some modifications. It does not require an input for infrastructure service providers in forecasting exercises, nor require that infrastructure is available or planned. While the methodology document states that a coordinated approach should be used with planning matters across single/upper-tier municipal boundaries to ensure coordination of infrastructure needs within the CD, the guidelines should more explicitly state that growth projections and infrastructure planning must be considered together. It is important that growth projections do not occur in the absence of an analysis of available or planned infrastructure. Some infrastructure planning requires more lead time to deliver than the timelines sometimes contemplated through forecasting and phasing in of that growth. Therefore, it is recommended that significant coordination is completed well ahead of conventional forecasts.

Yours Respectfully,



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