

Toronto

October 10, 2025

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ERO#025-0844: Proposed Updates to the Projection Methodology Guideline

We act on behalf of Criterion (Nobleton) Development Corporation, GB (Nobleton2) Inc. 2798891 Ontario Inc. and 1001004791 Ontario Inc., collectively referred to as the Nobleton Southwest Landowner's Group (the "Group"). They are individually the registered owners of a number of parcels of land within the southwest quadrant of the Nobleton settlement boundary, in the Township of King. The Township is currently engaged in its 2051 Official Plan Review, and actively considering where and how it should grow. The Group has been an active participant in that process. It has a direct interest in how population and employment projections are arrived at in order to ensure that King Township in general, and Nobleton in particular provides sufficient land to meet the growth needs and market demands for housing. It is in that context that we provide these comments on the Projection Methodology Guideline proposed update (the "Update").

Summary

The Update is intended to be based on a number of principles including balance, consistency, transparency, and clarity. While the Update does provide guidance that should ensure a similar general approach is taken to calculating land needs across the province, it also includes broad discretion to allow municipalities to make growth decisions regarding the quantity of growth they choose to take on. As a result, the Update may lead to:

- i. inconsistent approaches to growth planning decisions in municipalities that ought to be planning consistently and in a coordinated manner;
- ii. decisions that will have the effect of limiting the amount of population and employment that is being planned for;
- iii. constraints on the ability to build the homes needed to meet planned growth and conflict with the numerous servicing and transportation plans that have been recently completed and initiated that are based on an entirely different set of growth assumptions.

Discussion

Based on the PPS 2024, the starting point for any growth management planning is the Ministry of Finance projections with some exceptions for municipalities subject to Provincial growth plans. The very first step in the recommended approach in the Update introduces an element of uncertainty and the potential for inconsistent growth decisions across municipalities. While the Update does contemplate a range of outcomes depending on which methodology is used, the practical implications of the flexibility provided to municipalities have the potential to lead to less growth being planned for across entire regional market areas, and significantly less in many cases.

In particular, using Method A, municipalities that have experienced less growth historically, and who may wish to continue with limited growth are given the option to use their limited historical growth as a justification to continue to take a limited share of future growth. The other end of the ‘range’ is Method B which, if used, would mean that small municipalities could continue to remain small as a proportion of the broader Census Division.

While the Update directs municipalities with low population growth or small existing size to use Method A or Method B, respectively, as a ‘floor’¹, they are also given the flexibility to modify projections provided they are in the projection range, and select a growth projection within its range.² There is nothing to limit municipalities from selecting the lower end of the range, thus limiting the amount of growth in that municipality.

The Update also permits municipalities that were previously subject to the Schedule 3 forecasts in the Growth Plan to continue to use those forecasts until they no longer satisfy the requirement to plan for a horizon of at least 20 years. This means that the Schedule 3 forecasts can continue to be used until 2031.

However, there are areas of the province where the Ministry of Finance forecasts are less than allocations under Schedule 3 of the Growth Plan, which could result in municipalities in actually planning for *less* growth, justified by the methodology in the Update. The combined use of the ‘floor’ forecast that being the lower of Method A and Method B, and the lower Ministry forecasts could have a compounding effect causing significant divergence from existing planning forecasts.

The practical implications of the flexibility provided by the Update are demonstrated in a “real world” application of the methodology. Our clients have retained Keleher Planning

¹ At p. 9.

² At p. 12.

and Economic Consulting Inc. to determine the various ways in which the methodology proposed in the Update could be implemented in York Region. It is important to note that each municipality is given discretion to make a range of decisions, which can produce a range of outcomes, which adds to the lack of certainty around how much growth will actually be planned for.

What the attached chart demonstrates is two scenarios. One in which allocations are revised based on the Schedule 3/York OP forecasts, and one in which the allocations are revised under the Ministry of Finance forecasts.

Revised Schedule 3 forecasts

If all York municipalities chose the lower of the two forecast methods against Regional Official Plan/Schedule 3 growth in the Region, or where both Method A/B are higher than the ROP and the municipalities therefore keep their ROP forecast allocations, the Region-wide forecasts would be substantially lower than the Schedule 3 forecasts – or 1,811,700 by 2051, instead of the Schedule 3 forecasts of 2,063,900. This would mean that the population being planned for would be 252,900 persons less than set out under the Growth Plan.

Revised MOF forecasts

If all York municipalities chose the lower of the two forecasts under Methods A and B against MOF growth, the Region-wide forecasts would be substantially lower than the Schedule 3 and the MOF forecasts – or a total of 1,491,980 persons by 2051, instead of the Schedule 3 forecasts of 2,063,900 persons or the MOF forecasts of 1,577,131, respectively. This would result in a combined Region-wide forecast that is over 85,150 persons lower than aggregated MOF forecasts, and 571,900 persons lower than aggregated Schedule 3 forecasts currently embedded in the Regional Official Plan.

The intent of the PPS 2024 and the overall direction of planning legislative and policy change over the last 7 years has been to ensure that growth is appropriately planned for consistent with the overall direction from the province to increase housing supply.

The Update, in its current form, provides too much discretion and flexibility to municipalities that have not grown in the last 10 years to continue that pattern, or for small municipalities to remain small, and for municipalities that wish to slow their rate of growth to do so.

Conclusion and recommendation

While the Update rightly acknowledges the uncertainty that can be associated with determining future growth patterns, and that a range of outcomes are possible, it would be

more appropriate to require that municipalities are required to plan for the high end of any range of population forecasts. This will ensure that growth is properly planned for, reduce likelihood of supply shortages, and the target of building sufficient homes to meet the needs of Ontarians is met.

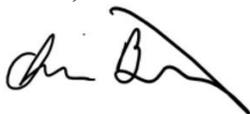
The Update should therefore provide express direction that:

- i. As a starting point for any planning decisions, municipalities should use a starting point of basing their allocations on the higher of the MOF projections, or Schedule 3 forecasts as allocated to them from the upper-tier municipality as may be currently allocated in their official plan;
- ii. In establishing municipal level allocations using recommended Method A or Method B, and associated housing need forecasts, where analysis leads to a range of numbers, municipalities should be required to plan for the higher end of the range;
- iii. If the allocation that results from the municipal level projections is lower than the starting point set out in i), above, then the higher number should be used;
- iv. The Update should make clear that as set out in policies 2.1.4 and 2.2.1 of the PPS, any methodology to determine the amount of land sufficient to meet projected needs should ensure that any analysis should take into consideration market demand, by planning for "... an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the *regional market area*³, such that estimates of housing and land need take into account needs by dwelling type;
- v. The population projection or allocation that is the result of any analysis is treated as a minimum and not a cap

We look forward to reviewing the next revision to the Update, and welcome any opportunity to engage with provincial staff on these important issues.

Yours truly,

Osler, Hoskin & Harcourt LLP



Chris Barnett

Partner

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³ Policy 2.1.4

Options for Approach to Disaggregation of York CD Forecasts to CSD

	ROP Allocation (Table 1)			
	Method A	Method B	Growth 2021-2051	ROP Share
York			1,209,300	100.0%
King	2.32%	4.28%	28,100	2.32%
Aurora	5.29%	10.42%	64,000	5.29%
EG	2.95%	16.78%	35,700	2.95%
Georgina	4.06%	3.50%	49,100	4.06%
Markham	28.85%	15.03%	349,000	28.85%
Newmarket	7.49%	5.86%	90,700	7.49%
RH	17.22%	11.03%	208,300	17.22%
Vaughan	27.54%	26.59%	333,100	27.54%
WS	4.25%	6.35%	51,400	4.25%

Allocation under PMG based on MOF				
1,209,300	2021 (York Region OP)			
1,577,131	2051 (MOF)			
MOF Method A		MOF Method B		
Growth 2021-2051	2051	Growth 2021-2051	2051	2051
	367,831	1,577,131	367,831	1,577,131
	8,547	36,647	15,748	43,848
	19,454	83,454	38,327	102,327
	10,858	46,558	61,710	97,410
	14,935	64,035	12,892	61,992
	106,115	455,115	55,282	404,282
	27,568	118,268	21,552	112,252
	63,331	271,631	40,576	248,876
	101,288	434,388	97,788	430,888
	15,632	67,032	23,343	74,743

Allocation under PMG based on Schedule 3				
1,209,300	2021			
2,063,900	2051 (Schedule 3)			
ROP Method A		ROP Method B		
Growth 2021-2051	2051	Growth 2021-2051	2051	2051
	854,600	2,063,759	854,600	2,062,575
	19,858	47,958	36,588	64,688
	45,198	109,198	89,047	153,047
	25,227	60,927	143,375	179,075
	34,699	83,799	29,952	79,052
	246,543	595,543	128,439	477,439
	64,051	154,751	50,072	140,772
	147,139	355,439	94,272	302,572
	235,326	568,426	227,196	560,296
	36,318	87,718	54,233	105,633

Summary of Potential Deviations from From CD Forecasts					
	(252,190)	(571,920)	potential difference from Schedule 3	196,502	(402,135)
	n.a.	(85,151)	potential difference from MOF	n.a.	84,634
	All Lows of Sch 3 Re-allocation	All lows of MOF		All Highs of Sch 3 Re-allocation	All Highs of MOF
York	1,811,710	1,491,980		2,260,402	1,661,765
King	47,958	36,647		64,688	43,848
Aurora	85,800	83,454		153,047	102,327
EG	60,927	46,558		179,075	97,410
Georgina	70,500	61,992		83,799	64,035
Markham	477,439	404,282		595,543	455,115
Newmarket	118,500	112,252		154,751	118,268
RH	302,572	248,876		355,439	271,631
Vaughan	560,296	430,888		568,426	434,388
WS	87,718	67,032		105,633	74,743

Method B Calculations (Growth Share)					Method A (Population Share)	
Census Populations (with Undercount)					Share of 2021 Population	
	2016	2021	2016-2021 Growth	Share of Growth	2021 Population	
York	1,143,900	1,209,300	65,400	100.00%	100.00%	
King	25,300	28,100	2,800	4.28%	2.32%	
Aurora	57,143	63,957	6,814	10.42%	5.29%	
EG	24,726	35,698	10,972	16.78%	2.95%	
Georgina	46,809	49,101	2,292	3.50%	4.06%	
Markham	339,041	348,870	9,829	15.03%	28.85%	
Newmarket	86,803	90,635	3,832	5.86%	7.49%	
RH	200,995	208,209	7,214	11.03%	17.22%	
Vaughan	315,611	332,998	17,387	26.59%	27.54%	
WS	47,241	51,391	4,150	6.35%	4.25%	

Summary of Potential Allocations to 2051			
	Method A	Method B	
EXAMPLE: Markham	28.85%	15.03%	
		Method A (CSD)	Method B (CSD)
MOF	367,831	106,115	55,282
Schedule 3	854,600	246,543	128,439
2021-2051 Growth in OP	261,500 persons		
		Method A	Method B
2051 Population (MOF Allocation)	455,115	404,282	
2051 Population (Schedule 3 Re-allocation)	595,543	477,439	
2051 Population in OP	610,500 persons		
	lower	lower	lower