

## Submission to Provincial Land Use Plans Branch, Ministry of Municipal Affairs and Housing

**To:** Provincial Land Use Plans Branch, Ministry of Municipal Affairs and Housing  
([growthplanning@ontario.ca](mailto:growthplanning@ontario.ca))

**Re: Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)**

**From:** Leslie Woo, CEO CivicAction ([leslie.woo@civicaction.ca](mailto:leslie.woo@civicaction.ca))

Date: October 10, 2025

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On behalf of CivicAction, thank you for the opportunity to offer feedback on the Province of Ontario's proposal under ERO O25-0844.

CivicAction is a non-profit organization that acts as a catalyst for positive change, turning collaboration and civic engagement into action to build livable, inclusive cities in the GTHA. For over two decades, we have brought together public, private, and nonprofit leaders to solve systemic urban issues. We appreciate the partnership of the Ministry of Municipal Affairs and Housing and support Ontario's intention to accelerate housing delivery through coordinated planning, streamlined approvals, and alignment with federal initiatives.

CivicAction's work across the Greater Toronto and Hamilton Area (GTHA), alongside our cross-sectoral [Housing Affordability Collaborative](#) of senior leaders across business, government, non-profit, healthcare, finance, and development sectors, underscores the urgency of such measures. Without deliberate intervention, the GTHA and Ontario will continue to lose the workers who keep our communities functioning, including nurses, PSWs, teachers, trades, and first responders, as they increasingly cannot afford to live where they work.

Our research shows that nearly one million middle-income workers in the GTHA spend 45-63% of their income on housing, far above the 30% affordability benchmark. Housing shortages for this group already cost the region \$6-8 billion annually in lost productivity, higher turnover, and recruitment challenges. Ontario's updated guideline

can play a critical role in reversing this trajectory to the benefit of our provincial GDP and national economic strength if affordability is explicitly embedded at each stage of the projection process. We appreciate the opportunity to highlight key considerations that can support the continued refinement of projections and advance more coordinated, data-driven planning around the workforce that powers the GTHA.

The following three recommendations can strengthen the proposed guidelines.

1. **Explicitly define affordability needs.** When projecting housing requirements to accommodate population growth, municipalities should explicitly define the levels of affordability needed, not just the total number of units. The updated methodology already allows municipalities to estimate both the scale and type of employment growth over the planning horizon. By linking these employment projections to expected wage ranges in key industries, municipalities can better assess the housing affordability needs of the future workforce. In our recent report, [The Human Story of Workforce Housing](#), we found that 82% of new essential service jobs, are being created in areas where less than 15% of homes are affordable to those workers (CivicAction, 2025). Ontario should require municipalities to set not only overall housing supply targets but also affordability targets that align with the income levels of future workers. This would ensure forecasts reflect the true affordability gap and support planning for housing that costs no more than 30% of household income across the income spectrum. Clear affordability targets would also help align new housing supply with anticipated consumer demand.
2. **Link growth choices to workforce housing targets.** When municipalities choose their preferred growth scenarios within the provincial range, those decisions should be directly tied to providing housing that meets the needs of Ontario's essential workforce. Particular focus should be placed on sectors that underpin social and economic resilience, such as healthcare, where employment growth is expected to be significant. For workers like personal support workers and nurses, municipalities should coordinate land use planning and development around major employment areas to ensure a mix of affordable housing options close to jobs. The average distance between affordable housing zones and essential job clusters has increased by 41% since 2010 ([CivicAction, 2025](#)). Aligning growth planning with workforce housing targets will strengthen Ontario's economic competitiveness, reduce pressures on transit, and retain essential talent.

- 3. Direct density to where workers need housing.** When identifying the land needed to accommodate population and employment growth, municipalities should apply clear assumptions that prioritize higher-density development in areas rich in jobs and transit access. While the City of Toronto has implemented this approach through its Major Transit Station Areas (MTSAs and PMTSAs), municipalities across Ontario should follow suit by using land near existing or planned transit hubs for housing affordable to workers earning 60–120% of area median income (AMI). Concentrating density in these locations will limit sprawl, support compact and connected communities, and allow workers to live closer to their jobs, which will reduce commute times, transportation emissions, and infrastructure costs.

Ontario's leadership is vital. The true measure of success will not be how many units are approved, but how many middle-income workers can access affordable, stable homes near their jobs. Every dollar invested in workforce housing generates \$4.30 in reduced social and infrastructure costs.

CivicAction stands ready to work with the province, municipalities, employers, and developers to ensure this updated methodology delivers on its promise: a more resilient housing system that keeps Ontario's workforce and economy strong.

Sincerely,



**Leslie Woo**  
CEO, CivicAction

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