

Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
13<sup>th</sup> Floor, 777 Bay Street  
Toronto ON M7A 2J3

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

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## THE ONTARIO HOME BUILDERS' ASSOCIATION

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario, representing 4,000 member companies organized into 28 local associations across the province, from Niagara to Thunder Bay and Windsor to Ottawa. Members include builders, developers, professional renovators, trade contractors, suppliers, and manufacturers serving the residential construction industry. In 2024, Ontario's residential construction industry directly and indirectly employed over 600,000 people, generated more than \$42 billion in wages, and contributed approximately \$90 billion in total investment value to the provincial economy. However, we caution that these economic indicators including jobs are in rapid decline across Ontario as housing starts and sales continue to fall. This sector must remain one of Ontario's largest economic drivers, playing a vital role in job creation, regional growth, and housing supply.

Please accept the below as our submission to the government's request for feedback on proposed guidance to assist planning authorities with identifying population and employment forecasts and assessing land needs requirements to better plan their communities.

This feedback is being submitted on behalf of OHBA and its 28 local associations including but not limited to the Building and Land Development Association (BILD), West End Home Builders' Association (WE HBA), Greater Ottawa Home Builders' Association (GO HBA) and London Home Builders' Association (LHBA).

## OVERVIEW AND SUMMARY

The Ministry of Municipal Affairs and Housing (MMAH) is consulting on proposed guidance to support the implementation of the *Provincial Planning Statement, 2024 (PPS, 2024)*—a new policy framework guiding how Ontario's municipalities plan for population, housing, and employment growth over the next 20 to 30 years. The guidance aims to provide a consistent, transparent approach for preparing population and employment forecasts and assessing land needs, replacing the 1995 *Projection Methodology Guideline*.

OHBA recognizes that the proposal responds to Ontario's rapid population growth and the need for effective long-term planning to ensure sufficient housing, infrastructure, and employment lands are available to meet future demand. The guidance outlines recommended methods and data sources for municipalities to allocate population projections, develop housing forecasts, estimate employment growth and determine land needs.

OHBA supports the modernization of the Projection Methodology Guideline (PMG) as a necessary step toward implementing the Provincial Planning Statement, 2024 (PPS, 2024). To ensure the PMG

achieves its intended outcomes, it must be strengthened to provide clear, enforceable, and market-responsive direction for population, housing, and employment forecasting across Ontario.

Key overarching themes include:

- **Concurrent Forecasting:** Population and housing projections must be developed together to ensure alignment with demographic demand and market realities.
- **Use of Provincial Baseline:** The October 2024 Ministry of Finance projections should be mandated as the common baseline for all municipalities.
- **Consistency and Coordination:** Municipal discretion to reduce or reinterpret provincial forecasts should be removed to preserve consistency across regions.
- **Market Responsiveness:** Forecasting must incorporate real-world development and absorption dynamics, including suppressed household formation and realistic intensification potential.
- **Implementation Focus:** Infrastructure and servicing considerations should shape *how* housing is delivered—not *how much* housing is planned for.
- **Employment Forecasting Continuity:** Employment forecasts should continue to rely on NAICS classifications to maintain policy and land-use consistency.
- **Transparency and Accountability:** The Province should establish a clear monitoring and reporting framework to track municipal performance and housing delivery outcomes.

Together, these themes establish a framework that is evidence-based, outcome-oriented, and designed to restore balance, predictability, and housing affordability to Ontario’s growth planning system.

### PREVIOUS OHBA FEEDBACK PROVIDED ON PROJECTION METHODOLOGY GUIDELINE (2021)

In its September 2021 submission to the MMAH (ERO #019-2346), the OHBA expressed support for updating the PMG, originally issued in 1995, to better reflect Ontario’s accelerated population growth and evolving land use planning needs. OHBA emphasized the importance of an empirical, consistent, and flexible methodology that supports housing supply, choice, and affordability aligned with the *More Homes, More Choice* housing plan.

Key points from OHBA’s 2021 feedback included:

1. *Alignment with Provincial Policy:*  
The updated PMG must be mandatory for all municipalities and consistent with the (former) Provincial Policy Statement (PPS, 2020), and particularly Section 1.4.3 requiring planning authorities to provide for a full range and mix of housing options to meet current and future market-based needs.
2. *Implementation and Appeals:*  
OHBA called for clarity under Sections 17 and 26 of the Planning Act, including a fair appeal mechanism for Official Plans or amendments, ensuring accountability and transparency.
3. *Guidance and Consistency:*  
The PMG should maintain the step-by-step methodological guidance of the 1995 version while enhancing certain technical aspects through continued consultation with MMAH and technical experts.
4. *Early Provincial Oversight:*  
MMAH should review and guide municipal projection methodologies early in the Official Plan process to ensure consistency and reasonableness.

5. *Data and Realism:*

OHBA urged that projections be grounded in real-time data, accounting for demographic trends such as aging populations remaining in family homes and the impact of household formation rates by age and size on future housing mix.

6. *Employment and Mixed-Use Areas:*

Employment projections should ensure adequate land supply for employment and mixed-use areas, promoting intensification and efficient land use.

7. *Market-Based Housing Needs:*

The updated PMG must include a mechanism to ensure municipal forecasts align with provincial growth targets and market needs, securing an adequate and diverse housing supply to 2051.

Overall, OHBA's position stressed that a modernized PMG should provide clear direction, methodological consistency, and flexibility to ensure Ontario's housing and employment land needs are met in a market-responsive and affordable manner.

### **OHBA RESPONSE TO ERO #025-0844**

The Proposed PMG appropriately recognizes the importance of developing accurate population and employment forecasts to underpin growth planning. However, the methodology must be strengthened to avoid perpetuating or institutionalizing existing shortages and structural constraints in the housing system.

First and foremost, population and housing needs forecasting must be concurrent, not sequential. The process cannot first assume a capped population forecast and then calculate housing need to fit within that number. Forecasting population and housing requirements must occur together to ensure that the ultimate projections reflect both demographic demand and housing market realities. Allowing one to follow the other risks embedding systemic undersupply.

Similarly, historical trends and headship rates cannot be uncritically extrapolated forward. Past trends reflect the product of supply restrictions and affordability pressures, not natural demand. Using historic headship rates as a proxy for future conditions effectively locks in today's shortages rather than planning to resolve them. Future projections must be built on an objective standard that anticipates a properly functioning housing market, not one constrained by past policy or limited availability.

Out-migration pressures are only expected to intensify. This dynamic underscores the need for a more robust and adaptive settlement model that acknowledges restrictions on land supply and infrastructure delivery. The response to rising out-migration cannot simply be to open land via various methods in an ad hoc fashion. Rather, the forecasting and land needs processes must anticipate this trend and plan comprehensively for the housing and employment lands required to accommodate future growth within the province.

Granting excessive discretion to municipalities to adjust or reinterpret provincial forecasts undermines consistency and long-range coordination. A common, prescriptive forecasting standard is necessary to ensure municipalities across a region plan from the same baseline assumptions and can coordinate effectively, particularly between metropolitan and adjacent communities. Too much local variation risks reactive planning, where smaller municipalities are forced to adjust only after major urban centres have already exceeded projections.

Municipal forecasts should therefore be treated as minimum standards, not ceilings. Municipalities must have the ability to plan for higher, more ambitious levels of growth where justified, but not the discretion to artificially lower forecasts below provincial expectations. There remains room for local context, but

this cannot come at the expense of provincial ambition or regional consistency. Finally, if municipalities are effectively permitted to disregard or reinterpret provincial guidance, the new framework offers little improvement over the current state. Without clear, enforceable standards, the process risks continuing the same fragmented and inconsistent approach to growth planning that has contributed to today's housing and labour market challenges.

These principles apply equally to employment forecasting. Employment projections should continue to rely on NAICS-based classifications, which provide a consistent and established framework for assessing economic activity by industry. The NAICS system ensures that employment forecasts align with land use categories and the types of employment areas municipalities are required to plan for. A shift toward occupational-based (NOC) forecasting would blur these distinctions and complicate the translation of employment forecasts into tangible land needs. Maintaining NAICS-based forecasts allows for clear, industry-specific linkages between employment growth, land requirements, and infrastructure planning, while ensuring comparability and consistency across municipalities and regions.

The sections that follow build on these foundational principles, offering more detailed commentary on population, housing, and employment forecasting methodologies. Each component of the Proposed PMG must ultimately align with the objective of ensuring Ontario's growth management framework is not merely descriptive of current conditions, but prescriptive in its ambition, and setting clear, consistent, and future-oriented standards for all municipalities to plan for growth effectively.

### **Aligning Municipal Growth Forecasts with Provincial Population Projections**

A key new policy direction under the PPS, 2024 is the requirement that municipalities base their local population and employment forecasts on the MOF population projections. This approach is intended to ensure consistency and accuracy in planning for growth across Ontario. OHBA supports this policy direction as both appropriate and necessary. However, the current draft of the PMG introduces ambiguity and flexibility regarding which MOF projections should be used and when they must be incorporated, which risks undermining the intent of the PPS.

The PMG should clearly specify that the October 2024 MOF projections are the official population projections to be used in implementing the PPS, 2024, until the next release of the major 5-year update, which is expected in 2027. These projections anticipate a balanced approach to population growth and immigration, ensuring that sufficient land is available to meet a moderate level of growth across the province. In contrast, the more recent August 2025 MOF update reflects a substantially lower growth outlook—declining by approximately 10% across the Greater Golden Horseshoe (GGH) and 4% across the rest of Ontario compared to October 2024 projections. This represents a reduction of nearly 1.1 million people in just one year of forecasting, including drops of 435,974 in Toronto, 337,923 in Peel, and 118,735 in York. These year-over-year fluctuations illustrate why annual updates should not automatically trigger revisions to long-term land use planning exercises.

Municipal Official Plan reviews span multiple years and cannot reasonably be revised each time the MOF releases a new set of projections. Land use planning requires stability and predictability, while population forecasts may vary annually due to shifting federal immigration policies or short-term demographic assumptions. For this reason, the PMG should establish a clear and practical framework that balances consistency with responsiveness to new data.

Currently, the PMG indicates that municipalities will only be required to update their growth forecasts during their next Official Plan review cycle—typically every five or ten years under the Planning Act. This approach may delay the adoption of the MOF projections for several years, creating a patchwork of municipalities operating on outdated demographic assumptions. Furthermore, the PMG (page 9)

allows municipalities within the GGH to continue using the outdated 2051 forecasts from Schedule 3 of A Place to Grow: Growth Plan for the GGH (2019) until those forecasts no longer meet the 20-year planning horizon. This means that some municipalities could continue using data over a decade old, which is inconsistent with the province's intent to transition all municipalities to updated MOF projections.

Such misalignment can produce problematic outcomes in practice. For example, a municipality might reject a development or boundary expansion application based on an outdated growth management strategy, even though current MOF projections demonstrate substantially higher growth expectations. This disconnect undermines the PPS's goal of ensuring that planning decisions are informed by the most accurate and up-to-date demographic information.

To address these issues, the PMG should establish a clear and predictable update cycle requiring municipalities to incorporate new MOF projections on a five-year basis, aligned with the federal Census cycle. This would provide stability in planning assumptions, ensure transparency, and allow municipalities to reflect demographic trends without being subject to disruptive year-to-year changes in immigration or population forecasts. The October 2024 MOF projections should therefore serve as the foundational dataset for implementing the PPS, 2024, with subsequent updates drawn from major five-year MOF forecast revisions.

In summary, OHBA supports the Province's direction to base municipal growth planning on the MOF population projections but recommends that the PMG be strengthened to ensure effective, timely, and consistent implementation. Specifically, the PMG should:

- Mandate the use of the October 2024 MOF projections as the baseline for implementing the PPS, 2024, and for all municipal growth planning exercises for at least the initial 25-year horizon;
- Establish a defined five-year update cycle for incorporating new MOF projections, aligned with major forecast revisions (e.g., Census years); and
- Eliminate reliance on outdated Growth Plan (2019) forecasts, ensuring all municipalities are planning from a consistent and current demographic foundation.

By clarifying these requirements, the province can ensure that all municipalities are working from accurate and up-to-date growth assumptions, supporting timely housing delivery, consistent land needs assessments, and a more coordinated, evidence-based approach to growth management across Ontario.

### **Respecting Existing Official Plan Forecasts and Settlement Area Boundaries**

In implementing the PMG, it is essential that existing Official Plan population and employment forecasts and established settlement areas be respected and serve as the minimum growth forecasts for each municipality. Policies 2.1.2 and 2.1.3 of the PPS, 2024 recognize the importance of consistency in planning and the need to ensure that prior approved projections in Official Plans continue to guide growth management decisions.

Maintaining existing approved forecasts as the baseline for future planning exercises supports stability and predictability in the land use planning process. It is both good planning practice and consistent with the PPS requirement to provide sufficient land to meet forecasted growth needs. One of the key guiding principles of the PMG is to achieve *ambition and balance*—ensuring that communities have ample, adequately planned, and serviced land to accommodate population and employment growth.

In practical terms, this means that municipalities should be planning not only to meet but to be capable of accommodating growth up to the maximum range of their forecasted potential. Doing so provides flexibility, avoids artificial land constraints, and helps ensure that the housing market and employment areas can respond efficiently to demand. When too little land is designated, particularly as a result of adopting overly conservative or “no-growth” forecasts, serious distortions emerge in the housing market. The immediate outcomes are housing shortages, rising costs, and lost opportunities to attract businesses and jobs, all of which undermine the province’s stated objectives under the PPS to support housing supply and economic growth.

Furthermore, annual fluctuations in MOF projections should not be allowed to destabilize the planning framework established through approved Official Plans. If municipalities were required to adjust to every yearly update, it would create uncertainty, complicate ongoing Official Plan reviews, and could even call into question established settlement area boundaries. This level of instability would directly hinder the implementation of the PPS, which depends on long-term, coordinated, and predictable planning horizons.

To provide clarity and consistency, OHBA recommends that the PMG explicitly require municipalities to:

- Use established land, population, and employment forecasts from adopted Official Plans as the minimum baseline for future planning; and
- Ensure that upper-tier forecasts, where applicable, reflect at least the sum total of approved lower-tier Official Plan forecasts and respect existing settlement area boundaries.

This approach reinforces both the intent and the implementation framework of the PPS by ensuring that local planning decisions build on approved and provincially endorsed population and employment forecasts. It also supports the PPS principle of providing sufficient and flexible land supply, helping to reduce market imbalances, improve housing affordability, and maintain Ontario’s competitiveness in attracting investment and jobs.

### **Differentiated Approaches for Growth Forecasting and Implementation**

While the PPS, 2024 and the PMG seek to establish consistency across the province, the PMG must also recognize the diverse growth realities of Ontario’s municipalities. A “one-size-fits-all” approach risks overcomplicating the process for communities with limited or no growth, while underestimating the analytical rigor required for fast-growing municipalities.

To ensure that the PMG is both practical and proportionate, OHBA recommends that the methodology be divided into two implementation streams, similar to the structure of the 1995 PMG, which included a “Simple” approach. This would ensure that all municipalities can implement the PPS efficiently and appropriately according to their scale and rate of growth:

1. Stream One – Simplified PMG for Low-Growth Municipalities:
  - Applies to Census Divisions (CDs) without Large and Fast-Growing Municipalities, or to individual municipalities experiencing little or no growth.
  - These municipalities could apply a simplified PMG approach to establish land needs, using the MOF population projections directly as their population forecasts.
  - This stream would minimize administrative burden while ensuring smaller municipalities still meet PPS requirements.
2. Stream Two – Full PMG for Large and Fast-Growing Municipalities:

- Applies to CDs with Large and Fast-Growing Municipalities identified in Appendix A of the PMG or to municipalities experiencing significant growth (including those with growth commitments to the province).
- These municipalities must prepare their own population and employment forecasts using the full PMG to accurately assess land needs.
- The MOF projections would serve only as a baseline or starting point, with municipalities required to conduct more detailed work that considers settlement capacity, infrastructure availability, economic development, and regional growth pressures.

This two-stream approach reflects the practical realities of Ontario’s municipal landscape, ensuring that resources are directed where they are most needed while maintaining consistency with the PPS’s objectives.

It is also important to clarify that MOF projections are not true “forecasts”—a distinction noted in the draft PMG (page 5). Rather, they represent trend-based projections that extend historical population trends into the future to estimate provincial growth. These projections do not account for local circumstances such as physical or geographic constraints, servicing capacity, or the introduction of new growth areas. Consequently, the PMG should provide clearer guidance in Chapter 2, renamed “Establishing Municipal Population Forecasts”, to outline how municipalities should translate these high-level projections into forecasts that reflect their own capacity to accommodate growth.

Forecasting growth must consider factors such as the availability of land, infrastructure and servicing capacity, community facilities, and other local conditions, however, must not rely on these factors to underestimate their growth needs. Municipalities facing constraints (for example, those at their geographic or servicing limits) should assess how these limitations may affect their ability to accommodate projected growth. Conversely, municipalities with new or emerging growth areas should have the flexibility to adjust their forecasts upward to reflect additional capacity.

It should also be recognized that MOF projections are prepared by Census Division, which may not align precisely with Regional Market Areas (RMAs) as defined in the PPS. Municipalities must therefore coordinate to ensure that adequate land is available to accommodate population and employment growth within the broader RMA, consistent with PPS Policy 2.1.3. Where a lower-tier municipality cannot achieve its population forecast, other municipalities within the same or adjacent RMA should be able to adjust their forecasts to ensure that overall regional growth can still be accommodated. This flexibility ensures that market demand can be met even when local constraints exist.

Accordingly, OHBA recommends that the detailed forecasting and land needs assessment approach in the draft PMG apply primarily to municipalities with significant or fast-paced growth. Municipalities with low or stable growth should have access to a simplified approach that enables compliance with the PPS without requiring extensive technical analysis. This distinction would bring balance, clarity, and proportionality to the PMG’s implementation, ensuring that all municipalities, regardless of size or growth rate, can plan effectively and responsibly for their futures.

### **Housing Step 2 – Refining the Housing Need**

Step 2 of the PMG should focus squarely on finalizing housing need by type, ensuring a clear link between population forecasts and the types of housing required to accommodate that growth. The approach outlined in the draft PMG is simple and sound. Municipalities, under either implementation stream, should apply age-specific headship rates to determine housing need by type.

However, several of the “adjustments” referenced in this step are better applied later in the process, particularly when determining land need at the end of the assessment. Adjustments for affordability,

infrastructure, and local development factors should not alter the base housing need calculation, which is fundamentally demographic in nature. The affordable housing analysis, however, should continue to form part of this step, as affordability considerations directly influence the composition of housing need by type.

For municipalities using the more detailed PMG stream, forecasts should also be refined to account for cross-municipal growth dynamics within the same or abutting RMAs. In these cases, adjustments should reflect:

1. Past shares of housing market activity by type;
2. The planned urban structure for the region or county;
3. Existing and potential infrastructure;
4. Availability of developable land;
5. The realistic potential for intensification;
6. The provision of a full range of housing types and the achievement of affordability targets; and
7. Provincial policies and objectives relating to land designation and growth management.

This approach ensures that housing need forecasts remain grounded in demographic demand while recognizing practical planning considerations and regional interdependencies.

### **Housing Step 3 – Realistic Intensification Targets**

Housing Step 3 should focus on the realistic potential to achieve housing by type through intensification, essentially functioning as the first stage of a land supply analysis. While intensification remains a critical element of accommodating growth, particularly within Major Transit Station Areas (MTSAs), the PMG must emphasize that intensification targets cannot come at the expense of meeting forecasted housing needs by type.

The base housing need established in Step 2 represents the housing required to accommodate the projected population, based on existing market propensities and demographic patterns. Although policy direction can and should promote a greater diversity of housing options, municipalities must still plan to meet this underlying demand. Overly aggressive intensification targets, especially when combined with policy-driven shifts away from market housing propensities, risk creating housing shortfalls and fiscal imbalances by constraining supply in designated growth areas without a corresponding increase in deliverable housing.

Within the planning horizon, intensification targets should be established based on:

1. Historic rates of intensification and the practical likelihood of achieving higher targets, including associated fiscal impacts;
2. The realistic potential to achieve intensification within the context of complete communities and geographic factors, including access to public service facilities, existing or planned transit, and proximity to commercial and employment areas; and
3. The achievability within the planning horizon, based on a comprehensive intensification analysis that identifies the proportion of forecasted growth by unit type that can occur within existing built-up areas.

To avoid confusion following the rescinding of the Growth Plan, the PMG should also provide a clear definition of “Built-up Areas.” OHBA recommends the following definition be adopted:

“*Built-up Areas* means lands that have been graded and approved for development and those mapped by the province as built-up areas in the mapping produced by the Ministry of Natural Resources and Forestry, as updated from time to time.”

This clarification ensures a consistent interpretation across municipalities and provides a sound basis for calculating intensification potential under the PPS framework.

#### **NEW Housing Step 4 – Determining Land Need**

A new Housing Step 4 should be added to the PMG to clearly outline the process for determining land need, bridging the housing demand analysis with the land supply framework.

In this step, the total housing supply by unit type, derived from both built-up areas and designated greenfield lands, should be compared to the total housing demand identified in Step 2. The difference between the two establishes the housing required to accommodate additional growth by unit type.

To translate this housing requirement into a land requirement, densities must be established for each housing type that account for the full range of community uses required within new community areas: roads, parks, schools, stormwater management, institutional and commercial lands, and other infrastructure. These densities should be expressed as units per gross developable hectare (GDH) under a clearly defined concept of *Gross Developable Area*.

As an example, the following generalized density assumptions could be applied for the purposes of land need assessment:

- 12.5 units/GDH – Single and semi-detached dwellings
- 25 units/GDH – Row houses
- 40 units/GDH – Stacked and back-to-back townhouses
- 60 units/GDH – Low-rise apartments
- 150 units/GDH – Mid-rise apartments

The total land requirement for new housing would then be calculated by multiplying the number of additional units required (by type) by the corresponding density. This step ensures that the PMG process culminates in a transparent, evidence-based estimate of the land necessary to accommodate forecasted growth, and fully aligned with PPS principles of adequacy, efficiency, and housing choice.

#### **Defining Density and Applying Adjustments to Land Need**

To ensure consistency and clarity in applying the PMG, density calculations for designated growth areas must be defined on a “Gross Developable Area” (GDA) basis. This approach aligns with standard land use planning practice and ensures that density targets are applied only to lands realistically available for development.

The PMG should clearly state that Gross Developable Area excludes the following:

1. Natural heritage features and areas, natural heritage systems, floodplains, hazard lands, and stormwater management facilities where development is prohibited;
2. Rights-of-way for electricity transmission lines, energy pipelines, freeways (as defined and mapped by the Ontario Road Network), and arterial roads identified in municipal Official Plans;
3. Railway corridors;
4. Employment areas; and
5. Cemeteries and waste management facilities.

By excluding these categories from the developable land base, municipalities can more accurately assess the densities and land needs associated with accommodating future growth. This definition will also help prevent the overestimation of developable land and ensure a more realistic understanding of where and how new housing can be delivered.

With respect to PPS Policy 2.3.1.5, the achievement of the minimum density target of 50 residents and jobs per hectare should be viewed as a *final consideration* in designated growth areas—those lands located outside of built-up areas as defined in the PMG. In practice, this target should only be applied once the gross developable area has been delineated, ensuring that density calculations reflect true developable land rather than theoretical gross land areas.

### **Adjustments to Land Need**

Following the calculation of gross developable area, the PMG should outline a clear process for applying adjustments to land need, similar to the framework contained in the 1995 Projections Methodology Guidelines. These adjustments recognize that not all lands are equally developable or market-ready within the planning horizon, and they allow for a more accurate and implementable land needs assessment.

Adjustments should include consideration of the following three key factors:

#### 1. Technical Feasibility

Municipalities should evaluate the physical and servicing feasibility of potential development lands, including:

- The size, configuration, and ownership pattern of parcels;
- The availability of infrastructure and servicing; and
- Environmental or topographical constraints.

Importantly, the PMG should provide guidance for distinguishing between achievable supply (lands held by owners amenable to development within the planning horizon) and potential supply, where development is unlikely due to ownership or other constraints. Only the former should be assumed to contribute to housing delivery within the 15- and 30-year planning periods.

#### 2. Market Factors

Market conditions influence both the demand for and the realization of planned housing supply. The PMG should incorporate considerations such as:

- The range and affordability of housing types that can realistically be delivered;
- A vacancy factor of approximately 15% to reflect that not all designated lands will proceed to development within the horizon, noting that it is common for Employment Area to apply a vacancy factor of 15-25%; and
- The viability and sequencing of infrastructure investment necessary to support growth.

These considerations will help ensure that land needs assessments account for real-world market dynamics rather than purely theoretical supply potential.

#### 3. Planning and Political Factors

Planning and governance considerations play a critical role in determining whether new housing can be accommodated effectively. The PMG should guide municipalities to account for:

- The fiscal implications of accommodating new housing and providing supporting infrastructure;

- The municipality's willingness and commitment to enable development through timely approvals and infrastructure delivery; and
- The achievement of growth management objectives and complete communities consistent with PPS policy direction.

The timeframe required to plan and bring new lands to market must also be a central consideration. Municipalities should factor in that planning, approvals, and servicing of new lands can take up to 10 years before the first homes are built, and that build-out of new communities can span 20 years or more. Recognizing these timelines is critical to ensuring that municipalities meet the PPS targets of maintaining a 15-year supply of designated land and a 3-year supply of serviced land at all times.

Finally, the PMG should acknowledge that adjustments may also be required to achieve logical and contiguous settlement area boundaries when expanding to accommodate new growth. These boundary refinements are an essential part of good planning practice, ensuring that new community areas are efficient, functional, and integrated with existing development patterns.

Together, the refinements proposed to Housing Steps 2 through 4 and the clarified density methodology establish a more complete, transparent, and implementable framework for assessing housing and land needs under the PPS. The process should begin with a clear, evidence-based determination of housing need by type rooted in demographic projections, proceed to a realistic evaluation of intensification potential grounded in market and physical conditions, and conclude with a detailed and technically sound assessment of land requirements based on Gross Developable Area.

This structured approach ensures that municipalities plan for growth using accurate, achievable, and policy-aligned assumptions. It promotes stability by separating demographic housing demand from market-driven land supply considerations, while maintaining flexibility to respond to local and regional circumstances. Defining densities on a Gross Developable Area basis, excluding constrained or non-developable lands, further improves accuracy and transparency in determining the true capacity of designated growth areas.

By adopting these refinements, the province can ensure that the PMG supports a consistent, evidence-based, and market-responsive planning framework that delivers on the PPS objectives of housing adequacy, affordability, and complete communities. It also reinforces the principle that sufficient, properly serviced, and realistically developable land must be available across Ontario to accommodate projected population and employment growth.

In short, these adjustments will help ensure that the PMG moves beyond a technical exercise toward a practical and outcome-oriented tool; one that directly supports timely housing delivery, coordinated infrastructure investment, and a stable planning environment that meets the needs of Ontarians today and in the decades ahead.

### **Suppressed Household Formation**

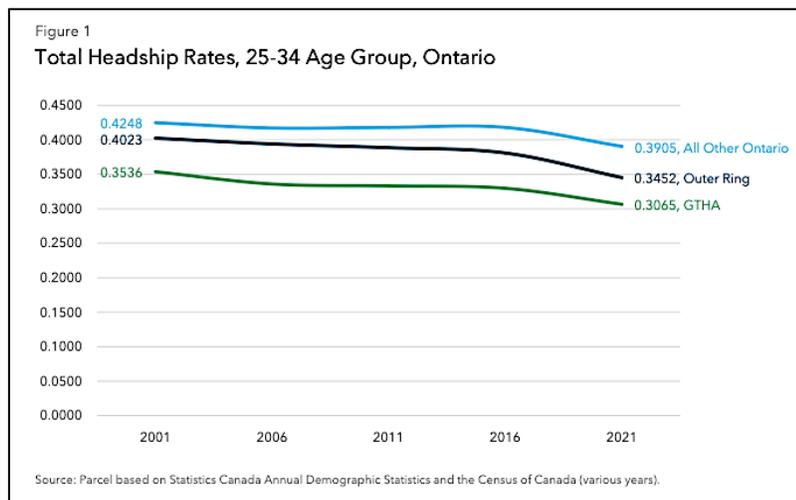
As part of the approach to forecasting housing needs, the Proposed PMG recommends that municipalities consider factors such as suppressed household formation. Page 20 of the Proposed PMG states:

*“Due to factors including demographic shifts, housing affordability, and availability of different unit types, there may be fewer census households than would have formed otherwise. Municipalities should use an approach that could be applied to calculate the extent of household suppression that is appropriate for its local data, circumstances and context. Each municipality should seek to obtain and document information that is relevant to its local circumstances.”*

*Municipalities may include an analysis of headship rates in comparison to other comparable municipalities. Where a municipality may identify a trend where its historical headship rate is lower than rates of similar municipalities, the municipality should adjust headship rates upward to account for lower, or suppressed, household formation.”*

OHBA agrees that analyzing suppressed household formation is a critical component of accurately assessing housing need and should therefore be a required element of every land needs assessment conducted under the PMG.

Parcel Economics provided a review of age-specific headship rates across Ontario which demonstrates the extent to which household formation is being suppressed by affordability constraints and the limited availability of diverse housing forms. Figure 1 illustrates headship rates for the 25–34 age cohort, representing those in their prime household formation years and the group most directly affected by housing affordability challenges.



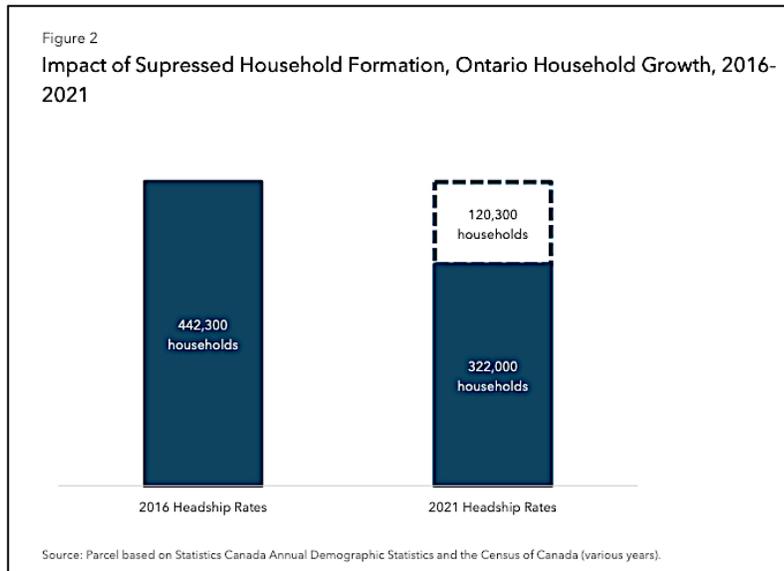
As shown, headship rates in the Greater Toronto and Hamilton Area (GTHA) are consistently lower than those in Outer Ring municipalities (as defined under *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*) and other municipalities outside the Greater Golden Horseshoe (“All Other Ontario”).

Even more concerning is that while headship rates for this age group have generally declined over the past 20 years (2001–2021), the most pronounced decline occurred between 2016 and 2021, a period marked by rapid housing price escalation across Ontario. The data clearly indicate that the 2021 headship rates are suppressed due to affordability pressures, not due to demographic or lifestyle changes.

Between 2001 and 2016, headship rates for the 25–34 age group declined modestly, approximately 0.2% per year. However, between 2016 and 2021, the rate of decline accelerated tenfold to 2.0% per year, directly correlating with worsening affordability and housing supply constraints.

If municipalities rely on these suppressed 2021 headship rates when preparing land needs assessments, they will underestimate true housing demand, resulting in insufficient land supply and a continued worsening of the housing crisis.

Figure 2 demonstrates this effect. Between 2016 and 2021, Ontario’s actual household growth totaled approximately 322,000 households. However, if 2016 headship rates were applied to the 2021 population, the province should have seen approximately 422,300 households, a shortfall of roughly 120,300 households.



This suppressed household formation represents a latent or unfulfilled housing demand; households that would have formed if housing were affordable and available. By continuing to use suppressed headship rates in municipal forecasting, the PMG would effectively bake existing housing shortages into future planning, perpetuating rather than resolving the problem.

This phenomenon has been corroborated by national-level research. Both the Canada Mortgage and Housing Corporation (CMHC) report *Housing Shortage in Canada: Updating How Much Housing We Need by 2030* and Will Dunning Inc.’s essay *How Large is the Housing Shortage in Canada?* identify suppressed household formation as a key driver of Canada’s overall housing shortfall. These analyses confirm that many Canadians, particularly younger adults, are living in shared, overcrowded, or delayed household situations due to affordability constraints, not by choice.

To ensure accuracy and alignment with actual housing demand, OHBA recommends that the PMG require municipalities to undertake a formal analysis of household suppression as part of their land needs assessment. This analysis should evaluate whether local headship rates are being artificially depressed by affordability or supply factors.

Where municipalities are unable to complete a suppression analysis, they should be required to default to headship rates from a previous Census period—specifically, a period before affordability challenges intensified (such as 2016). This approach would provide a more accurate baseline for estimating future housing need and prevent municipalities from under-planning for the number and type of housing units required.

By recognizing and correcting for suppressed household formation, the province can ensure that housing and land needs assessments truly reflect demand for homes—not just current market outcomes constrained by supply and affordability barriers.

### **Supporting Technical Analysis: Illustrative Impacts of the Draft PMG Methodology**

The preceding commentary outlines the overarching policy concerns and methodological risks inherent in the Draft PMG, particularly in relation to consistency, reliability, and the integration of land use, infrastructure, and fiscal planning. To further substantiate these observations, the following section summarizes independent technical analysis that illustrates the practical implications of the proposed PMG framework. This technical analysis, prepared by *Keleher Planning + Economic Consulting Inc.* (October 2025), applies the draft methodology to real-world population forecasts and demonstrates the magnitude of potential distortions that could result if the current approach were implemented without revision. The findings provide empirical evidence that reinforces the need for clearer parameters, greater methodological stability, and a settlement structure model that better aligns with Ontario's housing, economic, and infrastructure realities.

The technical review provides a useful empirical lens through which to understand the implications of the Draft PMG's allocation framework. The analysis applied Methods A and B to the MOF and Schedule 3 Growth Plan forecasts for York Region, comparing the resulting allocations to existing regional population targets.

#### *Substantial Downside Risk in Forecast Totals*

If all York Region municipalities were to select the lower of the two available PMG methods, the combined 2051 population would total approximately 1.49 million, compared to the 2.06 million forecast under Schedule 3 — a difference of roughly 571,900 people. Even relative to the 1.58 million MOF forecast, the low-end result is 85,000 people lower, representing a potential undercount of 5–6 percent at the Census Division level.

#### *Extreme Variability Between Municipal Outcomes*

The range between low and high allocations is striking. For example, Aurora's population could vary from 83,000 (Method A) to 153,000 (Method B); Markham's could vary from 404,000 to 595,000; and King Township's from 36,600 to 64,700. In some cases, the swing between low and high forecasts approaches 80 percent.

#### *Implications for Provincial Consistency*

Such large variations suggest that similar Census Divisions with multiple lower-tier municipalities — including Durham, Halton, Peel, Simcoe, and Waterloo — could face comparable distortions, leading to inconsistent planning baselines across Ontario.

#### *Disconnect with Infrastructure and Fiscal Planning*

Keleher's analysis emphasizes that these discrepancies risk decoupling population planning from infrastructure and financial models such as Development Charges and servicing strategies, which are built on consistent, long-term growth assumptions.

Collectively, these findings illustrate that the PMG's proposed range-based methodology introduces a high degree of volatility into population allocation, threatening the coherence of Ontario's growth planning framework. The evidence reinforces the need for clearer provincial parameters, methodological consistency, and a more integrated model that aligns demographic, economic, and infrastructure planning.

Taken together, the technical evidence underscores the broader concern that the Draft PMG's proposed allocation framework risks embedding inconsistency into the very foundation of Ontario's growth planning system. The demonstrated range of possible outcomes, both between municipalities and across Census Divisions, would create planning uncertainty, distort infrastructure investment decisions, and weaken the alignment between population growth, housing delivery, and employment forecasting. These findings reinforce the central message of this submission: Ontario's projection methodology must not only provide transparent and stable parameters but must also ensure that growth allocations are

informed by coherent, regionally integrated models that reflect where and how people will live and work. A strengthened, data-driven PMG will be essential to achieving the province's housing and economic objectives while maintaining confidence and predictability in the planning system.

### **Ensuring Realistic and Market-Responsive Growth Forecasts**

Good forecasting is both a science and an art. A sound methodology must acknowledge that the future is inherently uncertain and that a range of external factors—economic cycles, political decisions, demographic shifts, social trends, and environmental conditions—all influence population, employment, and ultimately, housing demand. As currently framed, the PMG relies too heavily on formulaic assumptions that do not adequately reflect how real markets function or how development actually occurs on the ground.

A key limitation of previous methodologies has been the assumption that designated or zoned lands automatically translate into built housing in a timely manner. This assumption overlooks the commercial and operational realities of Ontario's development industry. The process of bringing land to market is highly capital-intensive, complex, and protracted, and often requiring years of planning, engineering, and municipal approvals before construction can begin.

The development sector today is dominated by larger firms with the financial scale, in-house expertise, and construction capacity necessary to navigate these lengthy processes. These companies operate within multi-year cycles, balancing multiple projects and maintaining predictable output levels to sustain financing and employment. Approvals alone do not guarantee immediate housing delivery, and any methodology that assumes a direct or linear connection between approvals and construction fails to account for the structural realities of the industry.

Additionally, market behaviour further complicates timing. Developers may defer construction when market conditions soften, while some landowners may hold approved lands as investment assets until market prices rise. Other properties can be delayed by commercial disputes, estate issues, or ownership restructuring, leaving them idle for extended periods despite their planning readiness.

For these reasons, a credible and realistic land needs methodology should incorporate a "vacancy or absorption factor" to account for the proportion of approved lands that may not be developed within the planned horizon. While empirical research on this factor is limited, practical experience suggests that a 30–40% adjustment to land and unit projections would more accurately reflect market behaviour and help avoid the underestimation of land requirements.

Introducing such a factor would also help improve market competitiveness and reduce supply constraints, which are currently exacerbated by limited available land and prolonged approval processes. Without such an adjustment, the PMG risks artificially constraining housing supply, precisely at a time when Ontario faces acute affordability and availability challenges.

OHBA recognizes that some planning authorities may resist this approach, preferring tighter control over land supply. However, a balanced methodology must aim not to constrain but to enable housing delivery in a timely and market-responsive manner. The cost of underestimating land needs is far greater than the risk of modestly overestimating them, particularly given the long lead times required to bring new housing to market.

In summary, OHBA also recommends that the PMG:

- Incorporate a vacancy or absorption factor (30–40%) to reflect commercial and market realities affecting housing delivery timelines.

- Ensure the methodology remains flexible, evidence-informed, and responsive to changing economic and demographic conditions.

These refinements would help align Ontario’s growth management framework with both market realities and the province’s housing supply objectives, ensuring that land use planning supports, not constrains, the timely delivery of new homes across the province.

### **Infrastructure Capacity and Economic Considerations**

OHBA would also like to stress that infrastructure capacity should not be a determinant of housing need. Current servicing levels must not be used to constrain population or housing forecasts. Doing so effectively puts the cart before the horse, allowing short-term infrastructure limitations to dictate the scale of future growth rather than aligning infrastructure planning to accommodate projected demand.

Infrastructure capacity is more appropriately considered at the housing provision and implementation stage, when determining the type, phasing, and location of growth. The purpose of a land needs assessment is to identify how much housing is required to accommodate population and employment projections — not how much can be supported by existing infrastructure. Once need is established, municipalities and service providers should plan, prioritize, and fund the necessary servicing to meet that need.

If municipalities are permitted to modify population or employment projections (within clear provincial guardrails), there is a risk that some will use infrastructure capacity as a justification to suppress growth forecasts. This would directly contradict the province’s housing supply objectives and the intent of the PPS, 2024. Capacity must be planned to expand to meet demand, not the other way around.

Similarly, while economic conditions, including vacancy rates and cyclical market fluctuations, can influence the pace of delivery, they should not be used to adjust long-term housing need. These factors affect timing and absorption, not the fundamental requirement for homes to accommodate Ontario’s population and workforce.

In short, infrastructure and economic capacity are delivery considerations, not need determinants. The PMG should reinforce this distinction to ensure that housing need calculations remain demand-driven, forward-looking, and consistent with the province’s broader housing and infrastructure coordination goals.

#### *Intensification Targets (Chapter 2 – Intensification Guardrails)*

Intensification targets should be realistic and achievable, grounded in lands that are zoned, serviced, and development-ready. Forecasts should avoid overcounting density on lands that are not pre-zoned or lack servicing capacity. Where intensification targets exceed deliverable capacity, a mechanism should exist to shift unrealized units to greenfield areas where timely development is feasible. This approach balances policy intent with delivery practicality, ensuring housing supply targets are met rather than deferred.

#### *Serviceability Criteria (Chapter 4 – Deliverability of Lands)*

Once housing need has been established, the PMG should define clear and consistent criteria for determining which lands can be considered serviceable and deliverable. Land should qualify as deliverable if the required infrastructure—water, wastewater, utilities, and transportation—is either:

- (i) included in an adopted municipal capital plan, or
- (ii) fundable through a developer-led agreement or front-ending arrangement.

In these cases, no additional readiness tests should be imposed. A lean, standardized constraint matrix—covering floodplains, natural heritage systems, and buffers—should be applied consistently across municipalities, preventing the discretionary addition of local setbacks or restrictions that reduce housing capacity.

#### *Deemed Acceptance and Timelines*

The PMG should introduce a “deemed acceptance” mechanism to promote accountability and predictability. Where municipalities do not act within defined timelines, the corresponding assumptions or submissions should be deemed accepted. This ensures that the process remains efficient and avoids unnecessary procedural delays.

#### *Interim and Phased Servicing*

The methodology should explicitly recognize the benefits of interim or temporary servicing solutions that can accelerate housing delivery. Measures such as temporary pumping stations, modular stormwater management facilities, phased trunk infrastructure, and secured advance utility connections can advance housing delivery by three to five years, offering tangible benefits to municipalities, residents, and builders alike. Interim servicing solutions should also be eligible for development charge (DC) recovery, acknowledging their contribution to enabling early housing delivery within a controlled framework.

#### *Financial Feasibility and Deliverability*

The assessment of financial feasibility should apply a light-touch, practical approach. Evaluations should consider key cost factors—development charges, community benefits charges, parkland dedication, and external servicing—against realistic construction and financing costs. Municipalities should not require full business cases to demonstrate deliverability. The focus must remain on achievable implementation, rather than theoretical conformity with modelled assumptions.

#### *Provincial Monitoring and Accountability*

To strengthen transparency and accountability, the province should publish an annual monitoring bulletin or dashboard summarizing municipal performance against population, housing, and land needs forecasts. Comparative reporting would enable municipalities to course-correct early, improve data consistency, and ensure alignment with the province’s housing supply objectives.

In summary, these refinements would ensure that Ontario’s land needs assessment process remains evidence-based, demand-driven, and focused on practical delivery outcomes. By separating housing need from short-term infrastructure capacity and aligning serviceability criteria with realistic implementation pathways, the PMG can better support Ontario’s housing supply goals and promote coordinated, market-responsive growth across all municipalities.

### **Employment Forecasting**

Chapter 4 of the Proposed PMG outlines the recommended approach for developing employment forecasts. Unlike the 1995 PMG, which directed municipalities to use the North American Industry Classification System (NAICS) to categorize employment by industry, the Proposed PMG recommends a shift toward using the National Occupation Classification (NOC) system.

While this represents an important methodological distinction, it is one that could create confusion and inconsistency when forecasting employment growth and determining Employment Area land needs.

To clarify:

- NAICS codes classify employment by *industry*—for example, manufacturing (Codes 31–33), warehousing, retail trade, and related categories.
- NOC codes, on the other hand, classify employment by *occupation*—for example, accounting, management, or administrative roles.

NAICS Codes	NOC Codes
11 Agriculture, forestry, fishing and hunting	0 Legislative and senior management occupations
21 Mining, quarrying, and oil and gas extraction	1 Business, finance and administration occupations
22 Utilities	2 Natural and applied sciences and related occupations
23 Construction	3 Health occupations
31-33 Manufacturing	4 Occupations in education, law and social, community and government services
41 Wholesale trade	5 Occupations in art, culture, recreation and sport
44-45 Retail trade	6 Sales and service occupations
48-49 Transportation and warehousing	7 Trades, transport and equipment operators and related occupations
51 Information and cultural industries	8 Natural resources, agriculture and related production occupations
52 Finance and insurance	9 Occupations in manufacturing and utilities
53 Real estate and rental and leasing	
54 Professional, scientific and technical services	
55 Management of companies and enterprises	
56 Administrative and support, waste management and remediation	
61 Educational services	
62 Health care and social assistance	
71 Arts, entertainment and recreation	
72 Accommodation and food services	
81 Other services (except public administration)	
91 Public administration	

As illustrated in the table above, NAICS codes align directly with the types of uses and industries recognized in planning policy and land use designations, particularly those permitted within Employment Areas as defined in the PPS, 2024. The PPS defines Employment Areas as:

“Areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities.”

The PPS also explicitly excludes institutional and general commercial uses (including retail and office not associated with the primary employment use) from Employment Areas.

Similarly, the Proposed PMG’s own definition of Employment Land Employment (ELE) is based on industry categories that directly correspond with NAICS-based activities:

“Jobs related to industries and activities that are generally not compatible with sensitive land uses and are primarily located within or adjacent to employment areas (e.g., manufacturing and warehousing jobs).”

Both the PPS and the PMG therefore frame Employment Land Employment in terms of *industrial activity*—that is, NAICS categories—rather than by occupational function.

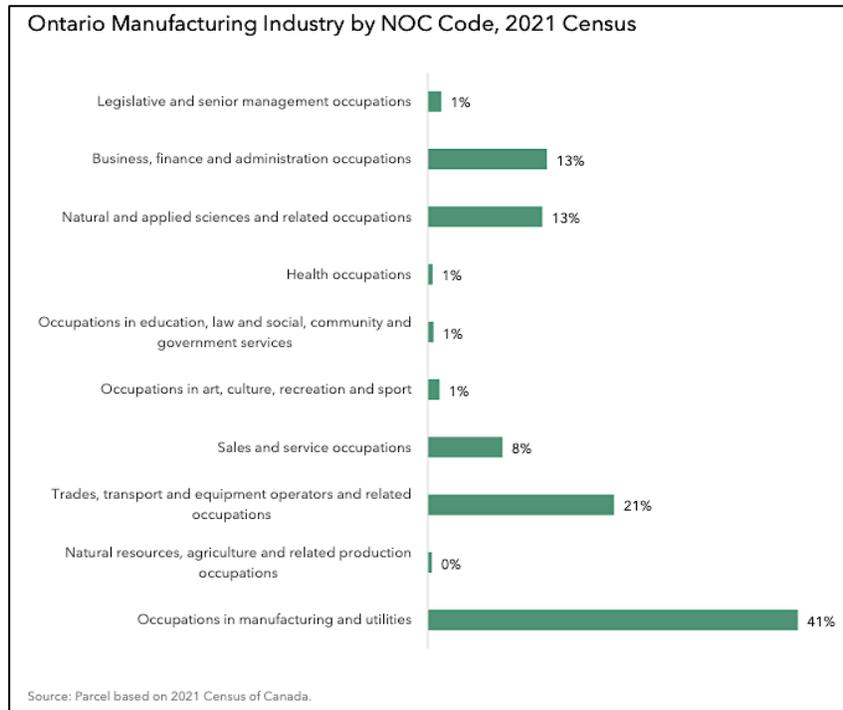
#### *Issues with Using NOC Codes*

Forecasting based on NOC classifications introduces a significant degree of complexity and potential misalignment with provincial policy. Because NOC codes identify the type of job, not the industry in which it occurs, they do not correspond neatly with land use designations or the types of employment areas municipalities are required to plan for.

For example, an accountant (classified under NOC 1 – Business, Finance, and Administration Occupations) could be employed at a manufacturing plant, warehouse, or office park. As a result, employment forecasts based on NOC codes could inadvertently classify the same type of land use

across multiple occupational categories, making it difficult to determine how much Employment Area land is actually required.

In modern industrial operations, these overlaps are even more pronounced. Contemporary manufacturing or logistics facilities typically include both administrative and production functions within the same building—for example, sales, accounting, finance, and management staff working alongside manufacturing, assembly, or warehousing operations.



Data from the 2021 Census of Canada confirm this overlap. Within the Manufacturing Industry (NAICS 31–33), approximately 21% of jobs are classified under Business, Finance, Administration, Sales, and Service occupations—positions typically considered “office” jobs. This creates confusion under the NOC framework, since the PPS restricts general office employment on Employment Area lands. Without clear alignment between occupation and land use type, municipalities and their consultants would be forced to make arbitrary assumptions about the share of “office” jobs that occur within industrial or employment lands. This could lead to underestimation of Employment Area land needs, since jobs that are actually located on industrial lands may be categorized as non-employment area jobs under a NOC-based approach.

To maintain consistency with both the PPS, 2024 and historical practice under the 1995 PMG, OHBA recommends that employment forecasting continue to rely on NAICS codes.

Forecasting based on NAICS ensures that employment projections are directly linked to industry-based land use designations, providing a clearer connection between employment growth and land needs. This approach avoids the confusion associated with occupational classification systems, aligns with the PPS definition of Employment Areas, and ensures municipalities can accurately plan for sufficient and appropriate employment lands to support Ontario’s economic growth.

In short, NAICS-based forecasting remains the most practical, policy-consistent, and technically sound method for aligning employment growth projections with land use planning under the PPS, 2024.

## CONCLUSION

Ontario's housing and employment planning framework stands at a pivotal juncture. The updated Projection Methodology Guideline has the potential to serve as a critical technical foundation supporting the ambitious objectives of the Provincial Planning Statement, 2024. However, to fulfill this potential, the PMG must move beyond being a procedural tool and instead function as a proactive instrument that drives housing delivery, economic growth, and infrastructure coordination.

As outlined throughout this submission, OHBA's overarching concern is that without stronger parameters, clear minimum standards, and a prescriptive implementation framework, the Proposed PMG risks perpetuating the very inconsistencies and underestimations that have constrained Ontario's housing supply for more than a decade. Population and housing forecasting must be concurrent and forward-looking, not reactive to past or suppressed trends. Projections built on affordability-constrained data or historical headship rates will continue to embed undersupply into Ontario's growth planning, rather than resolving it.

The Guideline must clearly require that the October 2024 Ministry of Finance projections serve as the common baseline for all municipalities, with updates only on a five-year cycle. It must ensure that existing Official Plan forecasts and settlement boundaries are respected as minimum standards and that municipal discretion to reduce provincial forecasts is removed. A structured, two-stream implementation model—differentiating between low-growth and fast-growing municipalities—would balance administrative practicality with methodological rigour.

At the technical level, OHBA recommends embedding a vacancy or absorption factor to reflect real market behaviour, mandating an analysis of suppressed household formation, and defining densities on a Gross Developable Area basis to ensure realistic and transparent assessments of land supply. These refinements will ensure that housing and employment forecasts are both evidence-based and implementable, capable of supporting a 15-year designated and 3-year serviced land supply as required under the PPS.

Equally important, infrastructure capacity and economic conditions must be treated as implementation considerations—not determinants of need. Planning must ensure that capacity expands to meet forecasted demand, not that demand is curtailed by existing capacity limitations. The Guideline should promote flexibility, early provincial oversight, and accountability mechanisms, including a provincial monitoring framework to track performance and outcomes over time.

Finally, employment forecasting should continue to rely on NAICS classifications, ensuring that economic projections correspond directly to land use designations and Employment Areas as defined under the PPS. This approach preserves consistency with past practice, aligns with policy intent, and avoids the confusion and misclassification risks inherent in an occupational (NOC-based) system.

Taken together, these recommendations position the PMG as an enabling framework—one that is data-driven, market-responsive, and implementation-oriented. By adopting these refinements, the Province can ensure that Ontario's projection methodology supports not just accurate forecasting, but timely housing delivery, coordinated infrastructure investment, and sustainable, economically balanced communities.

Ontario's housing and economic challenges demand a methodology that is ambitious, transparent, and practical. OHBA and its member associations remain committed to working collaboratively with the Ministry of Municipal Affairs and Housing to ensure that the final Projection Methodology Guideline achieves these objectives and provides municipalities with a stable, evidence-based foundation to plan confidently for the future of Ontario's communities.

## SUMMARY OF KEY RECOMMENDATIONS

Category	Recommendation
<b>Population Forecasting</b>	Mandate use of the October 2024 MOF projections as the provincial baseline for all municipal growth planning.
	Establish a five-year update cycle for forecast revisions aligned with Census years.
	Require municipalities to treat existing Official Plan forecasts and settlement areas as minimums, not ceilings.
<b>Housing Forecasting</b>	Require concurrent development of population and housing forecasts.
	Mandate formal analysis of suppressed household formation to avoid embedding undersupply.
	Apply age-specific headship rates from pre-affordability-crisis years (e.g., 2016) when suppression analysis is not possible.
	Introduce a 30–40% absorption/vacancy factor to reflect realistic development timelines.
	Define densities using Gross Developable Area (GDA) and exclude non-developable lands from calculations.
	Add a new Housing Step 4 in the PMG to clearly calculate and adjust land needs by housing type.
<b>Intensification and Land Supply</b>	Require realistic, evidence-based intensification targets, grounded in deliverable lands.
	Allow shifting of unmet intensification capacity to greenfield areas.
	Clarify definition of Built-up Areas to ensure consistent interpretation across municipalities.
<b>Infrastructure and Implementation</b>	Reinforce that infrastructure capacity must not constrain housing need; it should be addressed at the delivery stage.
	Define “serviceable lands” as those in adopted capital plans or fundable through developer agreements.
	Introduce a “deemed acceptance” mechanism for missed municipal deadlines.
	Encourage interim and phased servicing as legitimate means of accelerating delivery.
	Implement provincial monitoring and reporting on municipal performance against housing and land supply targets.
<b>Employment Forecasting</b>	Retain NAICS-based forecasting to ensure alignment with Employment Area definitions under the PPS, 2024.
	Avoid use of NOC classifications, which complicate translation into land needs.
<b>Overall PMG Structure</b>	Adopt a two-stream methodology distinguishing between low-growth and fast-growth municipalities.
	Provide early provincial oversight and a transparent appeal mechanism to ensure accountability and consistency.