



Development Services  
Public Works  
**Halton Region**  
1151 Bronte Road  
Oakville, ON L6M 3L1

**October 10, 2025**

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

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

To Whom It May Concern:

Halton Region staff appreciate the opportunity to review and provide comments on the proposed updates to the Projection Methodology Guideline (the “Guideline”), which is currently posted for public consultation under ERO Notice #025-0844. Regional staff thank the Ministry of Municipal Affairs and Housing (MMAH) for its efforts to modernize the Guideline and align it with the Provincial Policy Statement, 2024 (PPS, 2024).

As an upper-tier municipality without planning responsibilities under Bill 185, Halton Region will rely on its Local Municipalities to prepare their population and employment forecasts. While the Region will not have a direct responsibility to interpret or apply the Guideline, it will continue to play an important role in the delivery of key regional infrastructure needed to support and enable local growth across the region and its Local Municipalities. To ensure effective and efficient delivery of key regional infrastructure that supports local growth, consistent interpretation and application of the Guideline will be essential.

This submission represents a response by Halton Region staff to the above noted ERO Notice. This response includes:

1. General comments to the ERO Notice contained in this letter; and
2. Appendix 1, which contains responses to the provincial questions from the ERO Notice in a table form.

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## Halton Region Staff Comments

### A. General Comments

The proposed updates to the Guideline introduces changes such as alignment with the PPS, 2024, use of modern data sources (e.g. Ministry of Finance population projection, Municipal Property Assessment Corporation's assessment data, municipal Employment Surveys, housing needs based on a regional market area, etc.), and integration of market contingency factors (e.g. fluctuations in supply and demand due to unusual economic or societal shifts). The proposed updates also include additional considerations to enable flexibility by the planning authorities to account for varying circumstances within their municipality.

The updates to the Guideline are appreciated for bringing alignment with the PPS, 2024, introducing additional flexibilities, and modernizing of the methodology; however, the Guideline should address and support the need for synchronization of forecasts amongst the lower-tier municipalities within a two-tier municipality where upper-tier municipalities do not have planning responsibilities under Bill 185 but remain responsible for delivering key regional infrastructure required to enable and support local growth within the region.

In the case of two-tier municipalities such as Halton Region, the Guideline poses a risk of fragmented planning for growth across the region if synchronization and alignment of the forecasts by the Local Municipalities is not achieved through the Guideline. For instance, when the Local Municipalities complete their growth forecast review using the Guideline at different times during a period that the Region's Master Plan is implemented for, it will lead to conflicts between the Local Municipal forecasts and the Region's Master Plan. This fragmentation will result in increased pressure on the Region that will require more frequent updates to its Master Plans than the typical five-year update period in the past. It would be a challenging task to frequently update the Master Plans that require long-term planning and certainties to effectively plan for large-scale regional infrastructure.

MMAH should consider additional guidance to implement a window for the lower-tier municipalities in a two-tier municipality to synchronize with the upper-tier municipality. The window could enable the reconciliation of the changes to the forecasts by the planning authorities at the regional level to inform key regional infrastructure planning (i.e. Master Plans).

### B. Forecasting Population - Transition from Growth Plan Schedule 3 Forecasts to the Ministry of Finance (MoF) Population Projections

The proposed updates to the Guideline serves to implement Policy 2.1.1 of the PPS, 2024 that require planning authorities to base population and employment forecasts

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using the Ministry of Finance (MOF) population projections with modifications, as appropriate. Previously, Schedule 3 to the Growth Plan provided for the base population and employment forecasts that provided the corresponding population and employment targets to the planning horizon of 2051.

Unlike the previous Schedule 3 of the Growth Plan that was typically updated every five years and referenced as a consistent policy target reflecting the provincial policy directions, the MoF population projections are updated on an annual basis to dynamically reflect the most current trends and historical trends rather than the provincial policy directions. As a result, this may lead to conflicts when the MoF population projections do not align with the provincial policy directions. In certain cases, the MoF population projections may contradict the provincial policy directions. For instance, the most recent updates to the MoF population projections suggest a much lower forecast than the provincially assigned Municipal Housing Targets to build a total of 1.5 million homes by 2031.

Recent updates to the MoF's population projections in Summer 2025 revise the population forecast for Halton Region by almost 100,000 less people compared to the previous forecast in Fall 2024. Significant changes such as this could result in inconsistencies and uncertainties due to fluctuations on an annual basis when the planning authorities (i.e. Halton's Local Municipalities) use different MoF population projections by virtue of initiating their review in different years.

MMAH should consider allowing municipalities to either use the latest Ministry of Finance (MoF) population projections or the same recent MoF population projections used by the neighbouring municipality of the same two-tier municipality as the base line, where appropriate. This flexibility will allow for consistency across the lower-tier municipalities within a two-tier municipal context.

### **C. Forecasting Housing Needs - Projected Requirements based on Current and Future Residents of the Regional Market Area**

The proposed updates to the Guideline reinforce the requirement for the planning authorities to forecast based on current and future residents of a "regional market area". The term "regional market area" has been previously used in provincial planning documents but without being defined (e.g. Growth Plan, 2019); however, interpretation of the term coincided with the geographic level of planning authority at the time (i.e. upper-tier or single-tier municipalities). The term is now defined in the PPS, 2024, which references upper-tier or single-tier municipality as the geographic context.

Due to the Region being identified as an upper-tier municipality without planning responsibilities under Bill 185 and the Local Municipalities planning for their own local growth as the planning authorities, individual interpretation of the "regional market area" by each Local Municipality results in ambiguity.

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MMAH should clarify the definition of a “regional market area” and provide guidance on how planning authorities should apply it within a two-tier municipal context.

In addition, the proposed updates recommend municipalities to develop their housing needs forecast while considering their minimum targets for the provision of housing for all market segments. When considering the market segments, the list could become exhaustive and also lead to inconsistent categorization of the market segments by municipalities. Similar to the land use categories defined in the Guideline for forecasting employment, a standardized set of housing type categories could be informative.

MMAH should consider a standardized set of categorization for housing types similar to the land use categories for employment.

#### **D. Forecasting Employment - Transition from the Growth Plan Schedule 3 Forecasts and Recommended Modernization of Methodology Using Statistics Canada’s (StatCan) National Occupational Classification (NOC) Data**

The proposed updates to the Guideline recommends use of the NOC data from StatCan. While the NOC data provides for useful statistics on occupational trends, there may not be a meaningful association between the NOC and the land use categories defined in the Guideline (e.g. general employment, employment land employment, and rural employment). Traditionally, municipalities have relied on the North American Industry Classification System (NAICS) that provide for statistics on the type of employment activities that have a greater association with the land use categories. Further, the intended use for the NOC as described by the Employment and Social Development Canada (ESDC) appear to also suggest otherwise, which includes but may not be limited to:

- Economists and statisticians, to guide the collection and compilation of data;
- Labour market researchers, to understand the underpinnings of the statistics they use;
- Government analysts, to guide policy decisions, to develop systems for training, for recruiting and job matching, to allocate spending for labour market programs, and for immigration selection procedures;
- Educational counsellors and students, for career planning and exploration purposes; and
- Job seekers, employment counsellors, and employers, to make effective use of labour market information services.

MMAH should reconsider recommending the use of NOC data as it may not align well with the land use categories in the Guideline. Instead, the NAICS data may offer a more meaningful association.

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If the recommendation to use the NOC data remains, the MMAH should coordinate with StatCan to make it readily accessible to the municipalities without requiring custom data requests.

## Conclusion

While Regional staff welcome the proposed updates to the Guideline in support of the PPS, 2024, the potential implications noted in this letter can be significant that may affect the Region's ability to effectively and efficiently deliver key regional infrastructure needed to enable and support local growth. Regional staff recommends the Province reconsider some of the proposed updates to the Guideline noted in this letter and requests clarification on other noted matters.

Thank you for providing the Region with the opportunity to comment on the proposed updates to the Guideline. We welcome the opportunity to further discuss these comments with provincial staff should additional clarity be needed or if there is interest in continuing dialogue prior to the release of the final updated Guideline.

Respectfully submitted,



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*Director – Development Services*  
Development Services  
Public Works  
Halton Region

**Appendix 1: Comments from Halton staff on the Provincial Questions in the ERO Notice #025-0844**

Question	Regional Comments
<p>1. What are your thoughts on the approach in the guidance:</p> <p>a. to developing municipal level population growth forecasts to the planning horizon based on Ministry of Finance population projections as required by policy?</p>	<ul style="list-style-type: none"> <li>▪ Unlike the previous Schedule 3 of the Growth Plan that was typically updated every five years and referenced as a consistent policy target reflecting the provincial policy directions, the MoF population projections are updated on an annual basis to dynamically reflect the most current trends and historical trends rather than the provincial policy directions. <ul style="list-style-type: none"> <li>○ As a result, this may lead to conflicts when the MoF population projections do not align with the provincial policy directions. In certain cases, the MoF population projections may contradict the provincial policy directions . For instance, the most recent updates to the MoF population projections suggest a much lower forecast than the provincially assigned Municipal Housing Targets to build a total of 1.5 million homes by 2031.</li> </ul> </li> <li>▪ MMAH should consider allowing municipalities to either use the latest Ministry of Finance (MoF) population projections <u>or</u> the same recent MoF population projections used by the neighbouring municipality of the same two-tier municipality as the base line, where appropriate. This flexibility will allow for consistency across the lower-tier municipalities within a two-tier municipal context.</li> </ul>
<p>b. to identifying the amount of housing required to accommodate forecast population growth to the planning horizon?</p>	<ul style="list-style-type: none"> <li>▪ The proposed updates recommend municipalities to develop their housing needs forecast while considering their minimum targets for the provision of housing for all market segments. <ul style="list-style-type: none"> <li>○ When considering the market segments, the list could become exhaustive and also lead to inconsistent categorization of the market segments by municipalities.</li> </ul> </li> <li>▪ MMAH should consider a standardized set of categorization for housing types similar to the land use categories for employment.</li> </ul>
<p>c. to identifying the amount of land needed to accommodate forecasted population and employment growth to the planning horizon?</p>	<ul style="list-style-type: none"> <li>▪ The proposed updates to the Guideline recommends use of the National Occupation Classification (NOC) data from StatCan. While the NOC data provides for useful statistics on occupational trends, there may not be a meaningful association between the NOC and the land use categories defined in the Guideline (e.g. general employment, employment land employment, and rural employment). <ul style="list-style-type: none"> <li>○ Traditionally, municipalities have relied on the North American Industry Classification System (NAICS) that provide for statistics on the type of employment activities that have a greater association with the land use categories.</li> </ul> </li> <li>▪ MMAH should reconsider recommending the use of NOC data as it may not align well with the land use categories in the</li> </ul>

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Question	Regional Comments
	<p>Guideline. Instead, the NAICS data may offer a more meaningful association.</p> <ul style="list-style-type: none"> <li>▪ If the recommendation to use the NOC data remains, MMAH should coordinate with StatCan to make it readily accessible to the municipalities without requiring custom data requests.</li> </ul>
<p>2. Are there additional resources, tools, or information that you think would be helpful to support implementing the guidance?</p>	<ul style="list-style-type: none"> <li>▪ In the case of two-tier municipalities such as Halton Region, the Guideline poses a risk of fragmented planning for growth across the region if synchronization and alignment of the forecasts by the Local Municipalities is not achieved through the Guideline. <ul style="list-style-type: none"> <li>○ For instance, when the Local Municipalities complete their growth forecast review using the Guideline at different times during a period that the Region’s Master Plan is implemented for, it will lead to conflicts between the Local Municipal forecasts and the Region’s Master Plan.</li> <li>○ This fragmentation will result in increased pressure on the Region that will require more frequent updates to its Master Plans than the typical five-year update period in the past. It would not be a simple task to frequently update the Master Plans that require long-term planning and certainties to effectively plan for large-scale regional infrastructure.</li> </ul> </li> <li>▪ MMAH should consider additional guidance to implement a window for the lower-tier municipalities in a two-tier municipality to synchronize with the upper-tier municipality. The window could enable the reconciliation of the changes to the forecasts by the planning authorities at the regional level to inform key regional infrastructure planning (i.e. Master Plans).</li> </ul>

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