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Response to ERO Posting 025-0844 – Proposed Updates to the Projection Methodology Guideline

Thank you for the opportunity to provide feedback on the proposed Projection Methodology Guideline (PMG) intended to assist municipalities with developing their own population forecasts, employment forecasts, and the resulting land needs requirements in alignment with the Provincial Planning Statement, 2024 (PPS, 2024).

In general, staff are supportive of the proposed PMG as it provides a replacement for the 1995 Projection Methodology Guideline which supported the now-repealed Growth Plan for the Greater Golden Horseshoe. The proposed PMG will continue the Province's efforts to provide a standardized methodology to help all Ontario municipalities identify population and employment forecasts and assess land needs to support implementation of PPS, 2024.

We have identified several areas of concern and other observations we would like to highlight for Ministry staff where additional clarification and/or additional detailed guidance would be helpful to municipalities. These are outlined below.

Municipal Population Projections

PPS, 2024 indicates that planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance (MOF).

As noted in the PMG, these projections are based on historical trends and may not align with local trends and conditions. We appreciate that the PMG acknowledges that the MOF projections may not reflect local characteristics, including:

- existing and planned infrastructure capacity and/or availability,
- economic and planning assumptions, and
- information from official plans or locally prepared projections.

As a result, we agree with the section of the proposed guideline that provides municipalities with the flexibility to adjust projections based on local conditions. This allowance is essential for accurate and responsive planning for local municipalities.

Housing Needs Forecasts

The PMG outlines that the Housing Needs step estimates total housing need outside the built-up area by subtracting growth accommodated through intensification from the municipality's overall projected growth.

However, this approach requires further clarification for municipalities that cannot expand outward – particularly those in the Greater Toronto Area (GTA) that are land-locked and have already reached or are nearing their built boundaries. These municipalities must rely entirely on intensification to accommodate future growth.

Additional guidance is also needed for municipalities approaching their boundaries, where low-density housing opportunities in greenfield areas may be limited. As land within municipal boundaries becomes fully utilized, sites suitable for low-density development become scarce. Remaining lands may be designated for higher-density, transit-oriented communities, potentially leading to an imbalance in housing types. This could also create pressure to convert lands not planned for residential use – such as employment lands – or to expand into protected natural and open space areas.

In municipalities like Oakville, where low-density housing currently dominates, recent housing needs assessments have identified a need for more medium- and high-density options to achieve a balanced housing mix. However, market forecasts may still show a preference for low-density housing, even when there is insufficient land to support it.

To support municipalities in applying the PMG methodology within constrained urban environments while remaining aligned with provincial policy, the PMG should provide guidance on the following key questions:

- How should municipalities address shortfalls in low-density housing when only medium- and high-density forms are feasible through intensification?
- Can intensification alone meet the PPS 2024 requirement to provide a “sufficient range and mix” of housing types?
- Does the “sufficient range and mix” refer only to new housing, or does it include existing housing stock?

Clarifying these points would help municipalities interpret and implement the PMG more effectively in the context of limited land availability.

It should be noted that many municipalities have undertaken or are in the process of undertaking the required Housing Needs assessment and clarifications to address these questions would be welcome and timely while this work is underway.

Employment Forecasts

Step 3 of developing an employment forecast in the PMG currently recommends using the National Occupation Classification (NOC) system to categorize forecasted jobs by employment type.

We recommend replacing the NOC system with the North American Industry Classification System (NAICS), also used by Statistics Canada, as the standardized framework for classifying employment.

The primary purpose of the PMG is to calculate the land area required to accommodate future jobs. According to our land economist consultant, NAICS is better suited for this purpose, as it enables a more direct correlation between employment and the land use requirements of specific industries. In contrast, the NOC system focuses on job functions and skill levels, which limits its ability to link job types to the amount of space typically required to support them. NAICS, by contrast, classifies jobs by industry, which is more directly tied to land use patterns and built form.

Oakville and other municipalities already use NAICS as the basis for employment forecasting. Aligning the PMG with this widely adopted approach would ensure consistency with current best practices and improve the utility of the PMG for municipal planning.

Land Needs Assessment

The purpose of the land needs assessment component of the PMG is to determine whether additional land is required to accommodate the forecasted population, housing, and employment growth identified in earlier sections. Where land is needed, the PMG provides direction on how to calculate the amount required.

Similar to our comments on the Housing Needs Forecast, additional guidance is needed for municipalities that cannot expand outward and must rely entirely on intensification to accommodate growth. This is already a reality – or will soon become one – for several municipalities in the Greater Toronto Area, including Oakville.

Under the current PMG methodology, growth expected to be accommodated through intensification is deducted from the total growth used to calculate land need. In cases where a municipality must accommodate all growth through intensification, the result of the land needs assessment would be that no additional land is required.

We recommend that the PMG explicitly identify this as a valid outcome of the land needs assessment. While the Provincial Planning Statement (PPS), 2024 emphasizes intensification, it does not clearly state whether intensification alone satisfies the requirement to provide “sufficient land” for a range and mix of housing types.

It would be helpful for the PMG to clarify that where the land needs assessment concludes no additional land is required due to intensification, this outcome satisfies the PPS, 2024 requirement – provided the forecasted growth can be accommodated through intensification strategies.

Further guidance is also needed for municipalities that are approaching full utilization of land within their boundaries. In such cases, it is plausible that the demand for low-density housing types may exceed the available land, while there may be an oversupply of opportunities for medium- and high-density housing types through intensification that surpasses the identified need.

We recommend that the PMG provide clear direction on how to reconcile this potential mismatch between housing need and the land available to accommodate different housing types. This would help municipalities plan more effectively within constrained boundaries while still meeting provincial policy objectives.

Intermunicipal Cooperation

The PMG identifies intermunicipal coordination as essential to achieving the outcomes of the forecasting and land needs assessment process. We agree that coordination is critical.

However, this raises an important question: What happens when collaboration does not occur, or when municipalities choose to adopt population forecasts that either exceed or fall short of the Ministry of Finance (MOF) projection for the Census Division (CD)?

Our land economist consultant has confirmed that the two methods outlined in the PMG for determining a municipality's share of the MOF population projection for Halton can produce significantly different results depending on the municipality. For example, in Oakville, Method A yields a lower population projection than Method B, while in a neighbouring municipality, the reverse may be true.

The flexibility of the PMG allows each municipality to select the method that best aligns with its planning objectives and analysis. However, if all municipalities in Halton choose the method that produces the upper range of population growth, the combined total would exceed the MOF projection for the region. This underscores the importance of coordinated planning.

Yet, the PMG does not clearly address what happens if municipalities cannot reach agreement or fail to align their projections with the MOF total. While the PMG recommends that municipalities submit their results and supporting rationale to their approval authority, it is unclear what role the approval authority plays in resolving discrepancies.

We recommend that the PMG provide clearer guidance on the responsibilities and authority of the approval authority in cases of:

- failed intermunicipal coordination, and/or
- misalignment with MOF projections

Specifically, the PMG should clarify:

- whether the approval authority has the mandate to reconcile conflicting forecasts,
- what process should be followed when municipalities cannot agree, and
- what criteria will be used to assess the validity of differing projections.

Providing this clarity would strengthen the PMG's role in supporting consistent, transparent, and coordinated growth planning across municipalities. Thank you for the opportunity to comment.

Sincerely,

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