

Hon. Rob Flack
Ministry of Municipal Affairs and Housing
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Date: October 10, 2025

Dear Minister Flack,

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

Arcadis Professional Services (Canada) Inc. (hereinafter referred to as “Arcadis”) is pleased to submit this letter in response to the Environmental Registry of Ontario posting (025-0844) regarding the Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024) posted by the Ministry of Municipal Affairs and Housing (the “Ministry”).

Arcadis specializes in planning, architecture, engineering, and consulting services, with a strong presence across Ontario. We support municipalities and agencies in achieving smart growth, climate resilience, and compliance with provincial planning policies. With a deep understanding of Ontario’s unique planning and regulatory landscape, Arcadis supports the Province’s commitment to updating the Projection Methodology Guideline (PMG) to reflect recent government priorities, incorporate new information and data sources, and integrate best practices, while providing province-wide consistency.

Upon reviewing the Proposed Updates to the Projection Methodology Guideline, Arcadis seeks clarification on several technical and implementation aspects. These questions are intended to support effective, consistent, and transparent adoption of the proposed PMG across Ontario’s diverse municipal contexts:

- 1. Please confirm whether the use of the proposed PMG will become mandatory for planning authorities under the Planning Act and PPS, 2024, or whether it will be intended as recommended guidance. Clarity on its legal status will support compliance and inform municipal decision-making.***

The Guideline is positioned as a key tool for implementing the PPS, 2024, with updated methods and requirements for forecasting and land needs assessment.

- 2. Will municipalities be permitted to use annual “minor” Ministry of Finance (MOF) forecasts as the basis for the projections, or will the comprehensive five-year “major” MOF forecasts become the required standard for local planning exercises? Clear direction would facilitate province-wide consistency.***

The MOF releases both annual “minor” and five-year “major” updates to Ontario’s population projections. The Guideline references the use of these projections as the foundation for municipal forecasts.

3. *What transition policies and guidance (e.g., training, technical resources, standardized templates, financial assistance) will be available to ensure equitable capacity for implementation across Ontario’s municipalities?*

If the proposed PMG becomes a requirement as part of an official plan review process, its application province-wide may present unique capacity challenges for smaller, rural, and non-Greater Golden Horseshoe municipalities. Supplementary guidance and technical assistance should be made available to municipalities who may require additional assistance.

4. *Will the Ministry provide a standardized template or reporting framework for municipalities to document assumptions, methodologies, and local adjustments, including any audit control or record-keeping requirements?*

Transparent and consistent documentation of methods and assumptions is crucial for the integrity of municipal forecasts and land needs assessments.

5. *To what extent do MOF projections already account for demographic shifts, internal migration, and international immigration? Will municipalities be expected to independently adjust for these factors, and if so, how can duplication or “double adjustment” be avoided?*

The MOF’s cohort-component model incorporates a range of demographic inputs, including migration. The MOF methodology should be made abundantly clear to municipalities as to not duplicate or “double adjust” municipal projections to reflect local context.

6. *What baseline variables and assumptions should all municipalities apply when making local context adjustments to the provincial projections? Establishing minimum requirements will promote consistency and facilitate provincial monitoring.*

To support transparency across jurisdictions, the proposed PMG references the need for documentation of local adjustments. The Province should consider identifying a list of “acceptable data sources to help provide a level of consistency for the local adjustments to the forecasts.

Arcadis appreciates the opportunity to contribute to this important consultation and supports the Ministry’s efforts to provide clear, evidence-based, and implementable guidance for Ontario’s planning authorities. We respectfully request that the above questions and considerations be addressed to ensure the successful and equitable implementation of the updated Projection Methodology Guideline.

Ministry of Municipal Affairs and Housing
October 10, 2025

Should the Ministry require further details or wish to discuss these comments in more depth, please do not hesitate to contact us.

Yours sincerely,

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