



October 3, 2025

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and

The Honorable Rob Flack  
Minister of Municipal Affairs and Housing  
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**Re: TCDSB Comments on Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024 - ERO 025-0844)**

The Toronto Catholic District School Board (TCDSB) has reviewed the Ministry of Municipal Affairs and Housing's *Proposed Updates to the Projection Methodology Guideline* (PMG), which were released to support the implementation of the *Provincial Planning Statement, 2024* (PPS, 2024). On behalf of the TCDSB, we are writing to provide feedback on the modified approach for calculating population and employment predictions, housing demands, and land requirements.

TCDSB appreciates the province's efforts to update the PMG to reflect current demographic trends in line with the respective projection methodology of school boards and to standardize procedures across municipalities. Accurate, open, and locally coordinated growth estimates are essential for school board long term planning, funding, and education delivery that keep up with residential expansion and population growth.

**Support for Standardized, Evidence-Based Forecasting**

TCDSB pupil projections are based on actual enrolment figures from the previous year and two-year historical retention rates. Using the most recent, detailed information source available to create a projection model helps to ensure that communities and school boards have a constant starting point when planning for long-term growth.

TCDSB observes that, according to the Ministry of Finance (MOF)'s *Ontario Population Projections* (2024-2051 reference scenario), Ontario's population is expected to expand from 15.6 million in 2024 to 19.8 million in 2051, a 27.4% increase, with significant regional variance. This rate of expansion emphasizes the significance of early and continuous coordination between municipalities and school boards to ensure that population estimates translate into prompt identification and acquisition of school sites in vulnerable areas (PPS 2.1.3) considering local trending alongside of regional reported shifts.

**Importance of Age Cohort Forecasting for School Planning**

TCDSB recognizes the PMG's need to generate population predictions for respective five-year age cohorts. As student enrollment is directly proportional to the number of school-aged populations, this information is critical for appropriate long-term planning.



PPS 2.4.1.2 requires that strategic growth areas be designed to handle large population and job expansion while also serving as focal points for public service facilities such as schools. To support this policy, the TCDSB suggests that municipalities share age-cohort data with school boards early in the projection process and give updates as applicable assumptions change.

The TCDSB also supports the recognition in the PMG of the importance of tailored housing forecasts. Such forecasts would enable school boards, working alongside municipalities, to better plan for student accommodation and educational service delivery.

*“Housing options and affordability: Municipalities should develop their housing needs forecast while considering their minimum targets for the provision of housing for all market segments, especially as suggested by market indicators. These include a mix of larger, family-sized homes, smaller workforce or student housing, ground-oriented housing, mid-rise, and high rise, as well as housing that is affordable to low- and moderate-income households and the PPS, 2024 requirement to provide for an appropriate range and mix of housing options. These factors may require adjustments relative to affordability and housing options, including the availability of various unit types, at the census base year.”*

### **Housing Needs Forecasting and Intensification Targets**

The TCDSB supports the proposed three-step housing prediction method, which connects population increase to housing demand and then to land allocation. This clarity is critical for school boards since housing type and location have a direct impact on school site selection, facility design, and transportation demands.

While PPS 2.3.1.3 requires municipalities to plan for intensification and redevelopment and establish minimum targets, the TCDSB observes that the methodology implemented gives municipalities leeway in determining local levels of intensification and redevelopment, and therefore the school board cautions that if intensification targets are set too low, growth may be disproportionately directed to greenfield regions. This could increase land demands, pressure municipalities to expand settlement boundaries, and delay school site acquisition, often at higher cost. The TCDSB submits that robust and realistic intensification targets are essential to align housing growth with timely and cost-effective school delivery.

### **Employment Forecasting and Community Context**

The PMG's classification of employment into General Employment (GE) and Employment Land Employment (ELE) categories are important in assessing community growth patterns. These employment estimates also have an impact on school design since work concentrations can influence daytime populations, demand for adult and continuing education, and potential for co-operative education programs.

In accordance with PPS 2.8.1.1 and 2.8.2.3, which direct municipalities to promote economic development and protect employment areas, the TCDSB recommends that municipalities share disaggregated employment data with school boards to help integrate education planning with future employment growth.



The TCDSB further notes that shifts in employment models—particularly hybrid and work-from-home arrangements—have already influenced household relocation patterns, with families moving from urban cores (where TCDSB has established infrastructure) to suburban areas (where capacity is limited). TCDSB recommends that the MOF consider explicitly analyzing the impact of current societal trends, specifically the Hybrid/WFH employment model, on household relocation and displacement.

*“... major technological or societal shifts (e.g. hybrid/remove work enabled through technological enhancements) and increasing demands to live beyond core metropolitan regions. A municipality could provide for a contingency factor by adjusting the forecasted housing needs upwards by a percentage, depending on the extent of data available.”*

### **Conclusion**

The TCDSB welcomes the proposed PMG revisions as a positive step toward more uniform, evidence-based growth planning. By including requirements for coordination with school boards and recognizing the potential consequences of certain methodological choices, the Province can ensure that the updated methodology supports not only housing and employment goals, but also the timely delivery of TCDSB schools as essential public service facilities.

We appreciate the Ministry’s consideration of these comments and would be pleased to discuss them in greater detail. For that purpose or if you require further information, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "D Boyce", with a horizontal line underneath.

Derek Boyce  
Associate Director, Corporate Services and Chief Commercial Officer  
Toronto Catholic District School Board