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Provincial Land Use Plans Branch  
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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 County of Simcoe would like to thank the province for the opportunity to provide feedback on the proposed updates to the projection methodology guidelines in support of the Provincial Planning Statement 2024. Accordingly, the County offers the following comments for consideration.

1. It is understood that the proposed updates to the projection methodology guidelines represent a new singular document that will be applied province wide. As a result, it is understood that the guidelines seek to offer options and flexibility that reflects the fact that this will need to be adapted to a wide variety of municipal circumstances.

The County of Simcoe requests that clarity is provided regarding which options must be used depending on the municipality type to avoid disputes on the most appropriate approach. If for example a certain method is not meant for a high growth municipality then this should be clearly stated.

It should also be clarified if the projection methodology is to be used exclusively by a Planning Authority for the purpose of long-term planning when developing and updating its Official Plan in accordance with PPS policies 2.1.3 and 2.1.4, or if this methodology can also be used by proponents of individual development applications to try and justify private settlement area boundary expansions. There is concern considering the flexible approach of the guidelines that it may result in several conflicting conclusions about growth projections and land needs, and constant disputes about which conclusion is the most accurate. The prospect of ongoing review of multiple growth projections and land needs analysis supporting private interests may invariably lead to lengthy and expensive OLT hearings, in turn taking resources away from implementing the growth efficiently.

2. The guidelines should clearly outline that municipalities may continue to forecast growth using population and employment forecasts previously issued by the province for the purpose of land use planning in accordance with PPS 2024 policy 2.1.2. For certain municipalities this will reinforce their ability to continue using the extensive land needs assessment work they have recently completed

and enable work to continue for the updating and creation of new Official Plans and maintaining clarity to conclude ongoing development approvals.

Prematurely “re-doing” the projection and land needs assessment work previously completed (e.g. via the Growth Plan) would create undue delays in planning for growth and finalizing master planning and secondary planning that may be underway to implement this growth. This previous land needs assessment work should more clearly be recognized as valid in the guidance material in accordance with as is permitted by policy 2.1.2 of the PPS.

For example, the County of Simcoe’s land needs assessment work completed in 2022 has been conducted with many of the aspects being outlined by the new methodology, and it is not expected that much discrepancy would be produced using the newly proposed methodology. As a result, County Planning continues to feel that the 2022 land needs assessment numbers as adopted by Council via COPA 7 can remain the foundation for County and local municipal Official Plan updates and land use planning decisions until such time as the next growth management review is completed whereby a transition to the new methodology and use of Ministry of Finance projections would occur.

3. When a municipality transitions to using Ministry of Finance projections and is located within a Census Division consisting of multiple planning authorities (i.e. counties and separated cities), the guidelines must clearly articulate how that dynamic is meant to occur. An example scenario addressing the situation of multiple municipalities jointly using disaggregated Census Division numbers would be of great assistance within the guideline.

If any arbitration of conflicting growth allocation is necessary due to using a disaggregated Census Division projections necessary, this should be adjudicated by the province. It would be costly and inefficient for that responsibility to fall to the municipalities involved.

4. Although mentioned, the guidelines should more prominently and precisely state that growth projections and infrastructure planning must be synchronized. It is extremely important that growth projections do not occur in the absence of available or planned infrastructure. The province should also create a standard or a definition about how a municipality demonstrates that infrastructure is “planned” or “available”.

We thank you for the opportunity to provide this input and would be pleased to discuss further if that would be of assistance.

Sincerely,



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