

October 10th, 2025

Provincial Land Use Plans Branch
Ministry of Municipal Affairs and Housing
13th Flr, 777 Bay St
Toronto, ON, M7A 2J3

RE: York Region Staff Response – ERO 025-0844

York Region staff appreciates the opportunity to provide comments on ERO 025-0844 Proposed Updates to the Projection Methodology Guideline supporting implementation of the Provincial Planning Statement, 2024 (PPS, 2024). This letter provides staff level comments for consideration.

Increased flexibility in proposed projection methodology guideline allows municipalities to reflect local conditions, though it may present challenges in achieving consistency when planning and delivering regional infrastructure and services

Population and employment forecasts provide a foundation for growth planning and infrastructure service delivery, informing decisions on when and how to expand the settlement areas in a financially sustainable manner.

The proposed Guideline recognizes that the Ministry of Finance's (MOF) projections alone are not enough to support comprehensive land use planning and allows municipalities to make adjustments reflecting local conditions. While consideration for local conditions is an important factor in planning for growth, the range of flexibility permitted can introduce varying degrees of subjectivity that will make planning and delivery of infrastructure and services more difficult.

Providing clear guidance and standard approach on how to incorporate local conditions into adjusted forecasts and land needs assessment would promote consistency and alignment between various municipal forecast and land need exercises, which is especially important when providing infrastructure systems and services that cross municipal boundaries. Additionally, providing municipalities with the technical background information on how the MOF projections are generated including the underlying assumptions and inputs would enhance their ability to interpret and adjust the population projections effectively

Through this proposed Guideline, it is possible that municipalities could establish ambitious forecasts that disproportionately allocate MOF projections for the Census

Divisions (CD) to their municipality. The 2051 Ministry of Finance (MOF) population projection for York Region is about 25% lower than previous Growth Plan forecasts with significant variances in population allocation for some local municipalities (see Appendix 1).

Without a clear method to equitably distribute Ministry of Finance projections into local municipal forecasts, it is anticipated that the proposed Guideline methodology could result in insufficient infrastructure capacity to meet ambitious local municipal growth objectives, including Provincial housing targets. The Province should consider revising the proposed methodology to provide the MOF projections at the census subdivision level.

Amalgamating population forecasts from local municipalities likely to create challenges for Regional infrastructure planning

As an upper-tier municipality without planning authority, the Region is no longer responsible for preparing a region-wide forecast. Consequently, we must consolidate population and employment forecasts from multiple planning authorities to support infrastructure and service planning. In the York Region context, amalgamating nine different forecasts for infrastructure planning introduces considerable complexity, effort, and time. Each of the nine local municipal forecasts may have different timing of forecast development, varying planning horizons, different sets of assumptions, and different local context variables. In addition, to adequately design Regional sewers, watermains, treatment facilities, storage facilities, roads, and transit that are shared across multiple municipalities, the Region will need to manage the complexity of providing infrastructure in an equitable way to support provincial, regional and local priorities such as housing targets, rapid transit and local municipal growth objectives.

Greater emphasis on intermunicipal coordination is necessary to ensure infrastructure investments are aligned with growth to optimize return on investment

Regional systems span multiple municipal boundaries to reduce costs while effectively providing efficient and effective operations that effectively integrate with local municipal systems to ensure safe drinking water, clean wastewater, and manage traffic congestion. The Region needs to make significant infrastructure investments in the coming years to support housing growth. Due to the significant costs of these infrastructure investments, they must be strategic and focused. Effective infrastructure planning requires considerable coordinated effort to complete the required technical analysis, regional hydraulic/traffic model scenarios, and more to meet these complex timing, scale, and costs restraints. Without more specific processes to guide this coordination under the Guideline, it is unclear if or how this coordination will occur. It is recommended that the Province identify tools – such as intermunicipal memorandums

of understanding – or strengthen policies that promote collaboration. This would provide clarity on how municipalities take a coordinated and integrated approach to planning for growth and infrastructure in a fiscally responsible manner.

If you have questions regarding this response or would like to discuss these recommendations, please contact Teresa Cline, Director (Acting), Planning Policy and Data, Economic and Development Services at Teresa.Cline@york.ca

Sincerely,

Teresa Cline

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#eDocs16959768

Appendix One: Example of MOF Population Projection Ranges using Proposed Guideline Methodology by Local Municipality, 2024-2051

	2024-2051 Sample Population Growth Based on MOF Projections- Method A	2024-2051 Sample Population Growth based on MOF Projections - Method B	Highest End Population Growth Range between Method A and B	2051 York Region PAB* Forecast	Difference Between Highest End of Population Growth Range and PAB Forecast	Percentage Difference between Highest end of Growth Ranges and PAB Forecast
Aurora	82,160	92,851	92,851	85,835	7,016	8%
East Gwillimbury	45,983	77,962	77,962	128,642	-50,680	-65%
Georgina	63,460	67,731	67,731	70,462	-2,731	-4%
King	36,057	42,361	42,361	51,013	-8,652	-20%
Markham	455,862	429,027	455,862	610,455	-154,593	-34%
Newmarket	117,059	109,732	117,059	118,495	-1,436	-1%
Richmond Hill	273,661	263,835	273,661	320,126	-46,465	-17%
Vaughan	437,772	436,083	437,772	575,866	-138,094	-32%
Whitchurch-Stouffville	65,116	86,995	86,995	103,028	-16,033	-18%
York Region	1,577,131	1,606,577	1,652,255	2,063,921	-411,666	-25%

Sources: 2024 population based on York Region year-end population estimates.

*Provincially Approved Baseline Forecast formerly known as the Regional Official plan forecast, 2022.