



October 11, 2025

Hon. Rob Flack
Minister of Municipal Affairs and Housing
17th Floor – 777 Bay Street
Toronto, ON M7A 2J3

Re: OPPI Feedback on Proposed Provincial Projection Methodology Guideline to Support the Implementation of the Provincial Planning Statement, 2024 (PPS, 2024)

Hello Minister Flack

On behalf of the Ontario Professional Planners Institute (OPPI), I am pleased to provide our comments on the “Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)” posted for consultation under ERO 025-0844. In general, we are encouraged with the direction of this proposed methodology guideline, and we commend the Province on their efforts in the preparation of this draft document.

Summary of Comments

This letter provides a total of 17 recommendations to potentially improve the technical approach, execution and implementation of the Projection Methodology Guidelines (PMG). These recommendations have been organized into the following key themes:

- **Flexibility and Scalability** - to structure, adjust and/or scale the guidelines to appropriately correspond to the varying levels of complexity presented across the broad spectrum of Ontario municipalities, ranging from small rural Townships/Towns to large fast-growing Cities
- **PMG Training and Data Support** - including the use of templates and case studies representing a broad spectrum of Ontario Municipalities
- **Methodological Recommendations** – to allow better results for Ontario municipalities as well as other public and private sector stakeholders when working with provincial population projections, developing population growth allocations, preparing housing and employment forecasts, as well as undertaking land need assessments

- **Using Technology to Improve Execution, Implementation and Monitoring** – leveraging data-driven, spatial, web-based automated growth management systems
- **Processes to Improve Implementation and Monitoring**

We will now present our recommendations by category.

1. Flexibility and Scalability of Projection Methodology Guideline (PMG)

Recommendation 1: PMG requirements should be structured to allow municipalities to structure, adjust, and/or scale their approach to the guidelines to appropriately correspond to the varying levels of complexity presented across the broad spectrum of Ontario municipalities from slow growing rural Townships/Towns to large fast-growing Cities.

A flexible and scalable methodology will ensure both growing and stable municipalities have the details needed to complete their projections and provide the flexibility to adjust based on local circumstances.

Recommendation 2: MMAH should consider the challenges that smaller municipalities have concerning matters like access to data, technical expertise, as well as vast geographies with varying demographic and economic issues/circumstances.

Often smaller municipalities are the ones that face the most challenges when it comes to addressing provincial projection requirements. Available data is not as robust at smaller levels of geography, particularly for less populated areas, which necessitates the need for mechanisms provided by MMAH to support these municipalities in their forecasting endeavors. Emphasis for smaller municipalities should be placed on growth shares/rate of change within broader regions as opposed to detailed review of migration and vital statistics. To address these limitations, annual provincial growth monitoring reports and potentially long-term population and employment projections at the broader regional level could be provided. Such reports could also provide a brief discussion of post-census population trends, demographic profiling, labour force trends, etc. at the regional level. Such analysis would also potentially help set long-term population forecast “control totals”, “benchmarking” and “sub-regional growth shares” within Ontario’s regions (e.g., Southwest, Central, Near-north, Northeast, Northwest).

Smaller areas could then use these broader forecasts to help gauge their share and rate of growth within the context of the broader region. Municipalities would also be encouraged to explain why population and employment growth within their respective jurisdiction is projected to grow significantly faster or slower than broader regional trends, recognizing that population and employment growth rates/changes will not be uniform by sub-region.

Recommendation 3: The updated PMG should continue to include a simpler methodology for smaller municipalities, including rural and northern communities.

As mentioned in Recommendation 2, the key challenge for smaller, rural municipalities is establishing “top down” population and employment forecasts. Smaller, rural municipalities would benefit from Provincial direction here. Data availability in smaller geographies is less robust and smaller municipalities, in most cases, do not have the same level of expertise and resources as large, fast-growing municipalities. The Province should consider the threshold that would trigger the option for use of a simpler methodology for smaller rural and northern Ontario municipalities. Potentially, building on the 1995 PMG, additional provincial direction should be provided in this regard.

Recommendation 4: Allow Municipalities the option to receive MMAH confirmation of population projections before review of land needs assessment.

The option for a two-step review approach would potentially reduce risk for municipalities when proceeding with Official Plan Reviews (OPRs), including extensive public engagement, Indigenous consultation, infrastructure assessments and updated growth strategy policies, in the event that MMAH recommends modifications to the forecasts at the conclusion of the OPR. Such an outcome can require municipalities to repeat steps associated with the growth analysis and land needs assessment resulting in additional time and expense dedicated to such efforts.

2. PMG Training and Data Support

Recommendation 5: MMAH should provide templates and specific training for municipalities.

With the new updates to the PMG, there is an important opportunity for MMAH to organize training sessions, webinars, and other resources to help municipalities understand and utilize the guideline effectively. Many planners do not have the required technical training regarding the inter-connections between economics, demographics, and the housing market to develop long-term population and employment projections. However, most planners do have technical training to assess and monitor development activity (i.e., building permits/completions) and to create an urban residential and non-residential land supply inventory. A template, including development activity and land supply inventory materials from MMAH would help standardize required datasets that municipalities are encouraged to complete and regularly monitor. These resources can also be made available to stakeholders (i.e., developers/builders) and the public.

As part of this training session, MMAH may wish to consider including at least three case studies which provide detailed steps for both large urban, fast-growing and smaller rural municipalities to address population, housing and employment growth/change as well as potential and urban land needs. For large-fast-growing municipalities these case studies should consider varying circumstances (e.g., constrained vs. expansion scenarios) to reflect municipalities that have limited opportunities for outward expansion due to a lack of available land for future urban expansion. Providing multiple case studies would offer a

balanced approach to implementing and achieving the broad planning principles identified in the PPS, 2024, under varying local circumstances.

These case studies should be supported by visualizations such as flow charts, graphs, diagrams, and infographics as well as the use of workbooks to be filled out by municipalities to assist with their respective growth analysis and urban land needs analysis. Inclusion of these materials helps to appeal to different learning styles and aids in comprehension by the reader.

OPPI would be pleased to discuss partnership opportunities with the Ministry to help facilitate the organization and delivery of training sessions for municipalities. OPPI is also available to provide recommendations to the Ministry and/or municipalities of member firms that are available to carry out components of the PMG that may be beyond the expertise of municipalities.

3. Methodological Recommendations

Working with Ministry of Finance Population Projections

Recommendation 6: Define and Differentiate Between Population Projections, Forecasts and Targets

As a starting point, the PMG should clearly define and differentiate between terms regarding population projections, forecasts and targets. These terms have different meanings, which can result in significantly different outcomes with respect to long-range planning, infrastructure and municipal service needs for municipalities.

- **Target:** represents a desired state, expressed as a policy objective (e.g., Bill 23 target of 1.5 million homes in Ontario over 10 years).
- **Population Projection:** represent a mathematical extrapolation of past trends based on calculations regarding future migration, fertility and mortality rates.
- **Population Forecast:** A forecast goes a step beyond a projection. It is the best possible estimate of future growth based on both historical trends, as well as expected changes resulting from reasoned assumptions, and anticipated implementation of policies affecting growth-generating projects.

The PMG should also clearly indicate how municipalities are to work with and distinguish between targets, projections and forecasts when preparing long-range growth forecasts and land needs assessments. Understanding the nuances between these terms has important implications on long-range land use planning, housing needs, infrastructure needs, municipal service delivery and all other decisions, which heavily rely on provincial direction regarding population and housing growth.

Recommendation 7: MMAH should emphasize that both the Ministry of Finance (MOF) projections and the PMG approach to population growth allocations represent a first step in establishing a baseline growth analysis for municipalities.

As noted on page 12 of the proposed PMG, the MOF projections are ultimately based on historical trends and cannot fully account for future events, such as, but not limited to, significant changes to near-term economic or housing market conditions, major economic expansions or business closures within a region of Ontario, large-scale planned urban boundary expansions, infrastructure constraints and/or the timing of major regional or local infrastructure improvements/expansions.

It is important that the Province emphasizes that the PMG represents a guideline only to assist municipalities with the preparation of growth forecasts and urban land need assessments. Accordingly, all municipalities have the flexibility to test, document and modify their approach and ultimate population, housing, and employment projections based on local considerations and circumstances. This may result in a different, and potentially more informed, outcome regarding the total population projections, growth allocations, and urban land needs for a respective municipality. Accordingly, it is appropriate for municipalities to test and supplement the PMG methodology to demonstrate where local circumstances may result in a different and potentially more accurate outcome regarding the long-term population outlook at the CD level, and/or growth allocations by local municipality. When considering large-fast growing Ontario Municipalities, the recommended Provincial PMG should encourage the results of growth and land needs to be tested and informed by additional local analysis.

Recommendation 8: The updated PMG should define and incorporate seasonal and non-permanent populations within the methodology.

In municipalities with a notable student population, the PMG should acknowledge that additional steps are required to incorporate and address the unique demographic characteristics, housing requirements and infrastructure needs of this population segment. Similarly, the PMG should also acknowledge that additional technical steps are required to project population and housing in municipalities with a significant seasonal component.

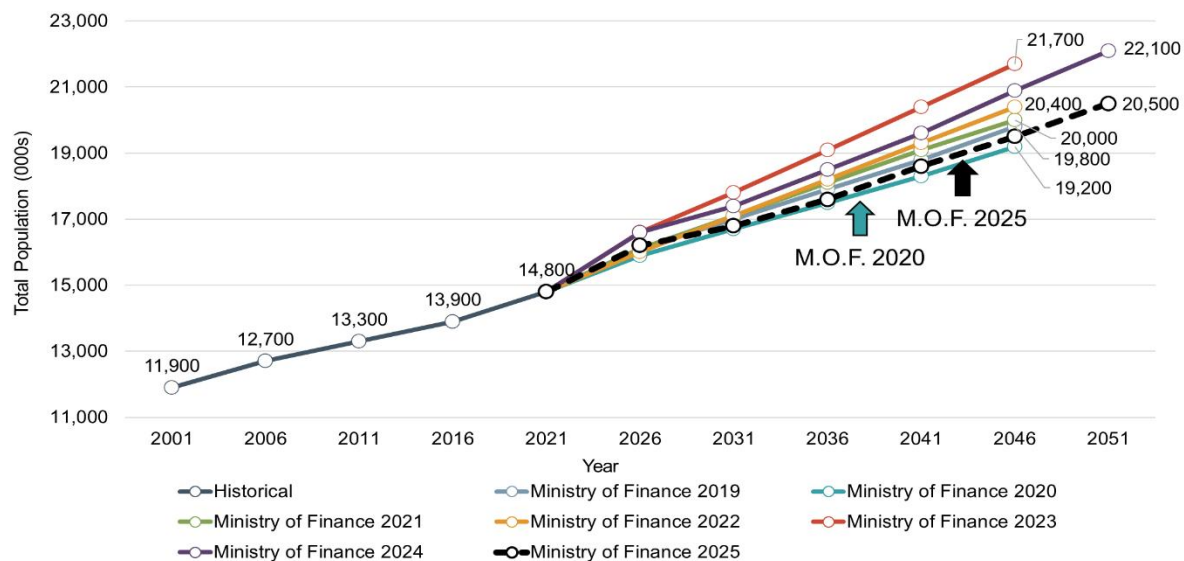
Recommendation 9: Align MOF Population Projections to Official Plan Five and 10-Year Review Cycles

The *Planning Act* requires Official Plans (OPs) to be revised every five years after an amendment is made, or 10 years after a new OP is approved. While population growth trends can vary on an annual basis, as noted on page 4 of the proposed P.M.G. document, urban land needs of a community do not generally fluctuate annually, given the long-term nature of land use planning. Accordingly, municipalities are not required to update their long-range forecasts outside of the statutory *Planning Act* requirements.

The MOF population projections are updated annually, including a major update every five years that incorporates the results of the latest Census. Figure 1 summarizes the range in long-term MOF population projections over the past seven years (2019 to 2025). While the near- and longer-term results of these annual population projections varied significantly

during this historical period (largely as a result of COVID-19 impacts), variations over the longer-term historical period (e.g. five years) are less pronounced. These longer-term demographic trends are important to consider when considering longer-term population projections.

Figure 1
Summary of Ministry of Finance Population Projections for the Province of Ontario, 2019 to 2025



Source: Statistics Census, 2001 to 2021 and Ontario Ministry of Finance Population Projections, 2019 to 2025.

To better align MOF population projections with five to 10-year OPR cycles it is our recommendation that MMAH emphasizes that the major MOF population projection updates (which are prepared every five years following the results of the most recent Census) are to be coordinated with OP updates, to the extent possible. This would help limit unnecessary updates and revisions to municipal growth forecasts and urban land needs studies. It would also reduce the potential to significantly overstate or understate long-term O.P. growth forecasts that are narrowly focused on MOF population projections which may have been prepared during outlier years, such as the years immediately following the COVID-19 outbreak.

Adopting a five-year focus on the MOF projections, and allowing for ranges in long-term population growth, also recognizes and addresses the lack of precision that planners/demographers have in projecting/forecasting population growth over the long-term at any one given point in time.

It is appropriate that demographic trends identified between major five-year updates (as part of MOF's annual projections) are considered and monitored as part of the OPR process. However, the PMG should emphasize that long-term population growth analysis studies conducted for the purpose of an OPR should be fixed to the results of the MOF major five-year population update. Such an approach should assist all relevant parties in

achieving the overarching provincial priority of cutting red tape, streamlining approvals and ultimately providing more housing options for Ontarians.

To assist in the preparation of these major five-year MOF population projection updates, OPPI would welcome the opportunity to partner with MMAH to coordinate collaboration between municipalities, planning and economic consultants, the development community and other key stakeholder groups and the Province.

Allocating Population Projections with Census Divisions

Recommendation 10: The PMG should set an upper population threshold as part of the population allocation process

Based on our understanding of the proposed PMG, two methods are offered to address the population allocation process as follows:

- Method A is based on a municipality’s current population share of the CD (e.g., 2021 or 2024, based on the most recent Census data or postcensal data); and
- Method B is based on the municipality’s share of population growth within the CD over a 10-year period (e.g., 2011 to 2021 or 2014 to 2024, based on the most recent Census data or postcensal data). The proposed PMG recommends applying population growth share trends from consecutive five-year periods within the previous 10 years to account for short-term variations in population growth.

We note that these two methods have the potential to generate varying outcomes regarding the percentage share of population growth, particularly in cases where a municipality has experienced notably higher population growth over the past 10 years relative to the average population growth rate for the CD. For example, Figure 2 below illustrates these two approaches when applied to the Region of Halton.

Figure 2
Summary of MOF Halton Region Population Projection by Municipality, 2024 to 2051 Using Proposed P.M.G. Method A and Method B

Method A – Existing Population Share

Municipality	2024 Population Share ^[1]	2024 to 2051 Population Growth Projection	2051 Total Population Projection
City of Burlington	30%	68,500	265,900
Town of Halton Hills	10%	23,600	91,600
Town of Milton	23%	53,000	205,800
Town of Oakville	36%	82,900	321,600
Halton Region	100%	228,000	884,900

^[1] Historical population share derived from Statistics Canada population estimates.

Note: Population includes net Census undercount.

Source: Historical population shares derived from Statistics Canada Table 17-10-0155-01, 2024 to 2051 Halton Region population projections adapted from Ontario Ministry of Finance Population Projection, Summer 2025, and municipal allocations derived by Watson & Associates Economists Ltd.

Method B – 10-Year Trend-Adjusted Population Share

Municipality	2014 to 2019 Population Growth Share	2019 to 2024 Population Growth Share	Population Growth Share - Trend Adjustment	2024 to 2051 Population Growth Projection	2051 Total Population Projection
Calculation Step	A	B	C = B + (B - A)		
City of Burlington	13%	9%	4%	9,600	207,000
Town of Halton Hills	6%	6%	5%	12,300	80,300
Town of Milton	44%	42%	41%	93,000	245,800
Town of Oakville	38%	44%	50%	113,100	351,800
Halton Region	100%	100%	100%	228,000	884,900

^[1] Historical population derived from Statistics Canada population estimates.

Note: Population includes net Census undercount.

Source: Historical population shares derived from Statistics Canada, Table 17-10-0155-01, 2024 to 2051 Halton Region population projections adapted from Ontario Ministry of Finance Population Projection, Summer 2025, and municipal allocations derived by Watson & Associates Economists Ltd.

As summarized in Figure 3 below, the two methods generate significantly different outcomes with respect to the share of population growth by local municipality and the total projected population for the CD. For Halton Region, if each municipality were to use the upper range in assigning their respective population growth allocation, the total 2051 population forecast would be 955,100, which is 70,200 people (8%) above the 2025 MOF population projection for Halton Region by 2051.

Figure 3

Range of MOF Population Projection by Municipality for Halton Region, 2024 to 2051 Using Proposed P.M.G. Method A and B

Municipality	2024 to 2051 Population Growth Range (Method A or B in Brackets)	2051 Total Population			
		Method A	Method B	Percentage Difference Between Method A and B	Choosing Highest Growth Between Methods A and B
City of Burlington	9,600 (B) - 68,500 (A)	265,900	207,000	-22%	265,900
Town of Halton Hills	12,300 (B) - 23,600 (A)	91,600	80,300	-12%	91,600
Town of Milton	53,000 (A) - 93,000 (B)	205,800	245,800	19%	245,800
Town of Oakville	82,900 (A) - 113,100 (B)	321,600	351,800	9%	351,800
Halton Region	157,800 - 298,200 (Mix)	884,900	884,900	0%	955,100
2051 Halton Region total population difference relative to the 2025 M.O.F. projections if choosing the high growth method by municipality.					70,200
2051 Halton Region population percentage difference relative to the 2025 M.O.F. projections if choosing the high growth method by municipality.					8%

Note: Population includes net Census undercount.

Source: 2024 to 2051 Halton Region population projections adapted from Ontario Ministry of Finance Population Projection, Summer 2025, and municipal allocations derived by Watson & Associates Economists Ltd.

It is acknowledged that long-range population forecasting is not precise. Typically, the longer the projection period, the less accurate long-term growth projections become. Given this uncertainty, it is industry practice to often identify a range when preparing long-term growth forecasts or projections. For example, the 2025 MOF projections identify a range of 13% between the medium and high provincial growth scenarios with respect to the difference in the total 2051 population. A similar range is also identified between the medium and low provincial MOF growth scenarios. We recommend that the long-term Ontario-wide population ranges established by MOF through the low, reference and high provincial growth scenarios should represent the upper and lower thresholds regarding the range in population projections at the CD level.

Developing Housing Needs Forecasts

Recommendation 11: Forecast housing needs should account for future change in headship rates where a historical trend has been observed.

The proposed PMG recognizes a number of broad factors that can influence housing needs, including population growth, economic factors, housing supply and demand, and infrastructure capacity. The proposed PMG provides a comprehensive three-step approach to determining the amount of housing needed for municipalities over the planning horizon based on the amount of population growth projected over the period. This includes identifying the type of housing units needed and the allocation by geographic location to assess housing and residential land needs in accordance with the PPS., 2024.

Municipalities can also consider housing affordability and market choice provisions in their housing needs assessments, which is considered a positive advancement in promoting a greater supply and diversity of housing options.

In Chapter 3, step 1 of the proposed PMG recommends using the forecast population by age structure and the application of age-specific headship rates (i.e., household formation rates) to determine forecast housing needs. It is important, however, to recognize that forecast headship rates used to calculate future housing needs may vary from those in the latest Census data based on observed historical trends.

Recommendation 12: A Housing Propensity Analysis should be provided by housing tenure when this approach is used to determine forecast demand by housing type.

It is our opinion that the consideration of future housing demand by tenure (i.e. ownership and rental housing) and affordability is critical in informing near- and longer-term housing propensity by structure type. Accordingly, where a housing propensity analysis is undertaken to inform long-term housing demand by structure type, it is recommended that this analysis is carried out by housing tenure to then inform total housing propensity by unit type.

Recommendation 13: Consider thresholds or limits to contingency factors to ensure that forecast housing needs are not overstated.

Chapter 3, step 2 of proposed PMG recommends that the housing needs generated from step 1 be adjusted to reflect local housing market factors and conditions that may impact the quantum of housing needs by housing type. The approach is intended to capture both existing and future housing needs, considering market vacancy, market contingency, market choice, and existing housing inventory (including units under construction) in accommodating the housing needs calculated. Furthermore, housing needs are recommended to be assessed by market/affordability, to help inform municipal housing targets. Again, this is considered a comprehensive approach to assessing both existing and future housing needs in a municipality and provides a more standardized approach to identifying housing affordability needs. OPPI supports guidance that considers market contingency factors but suggests that thresholds or limits to these factors are identified to ensure that forecast housing need is not overstated.

Developing Employment Forecasts

Recommendation 14: It is recommended that employment forecasts carried out by municipalities are informed by the North American Industry Classification System (NAICS) as opposed to the National Occupational Classification (NOC)

Typically, employment forecasts carried out by municipalities are usually informed by the North American Industry Classification System (NAICS) by Statistics Canada. The NOC classifies jobs and occupations based on the type of work performed, regardless of the industry, whereas NAICS. classifies jobs by the type of business or economic activity in which they are performed.

The NOC. system has advantages and disadvantages when utilized in growth forecasts. In our opinion, a key advantage of using employment classified by NOC lies in the ability to understand employment by specific skills, responsibilities, education, and training. This insight is useful for understanding the quality and type of workforce a municipality needs to attract, especially given the shift toward a knowledge-based economy.

The fundamental limitation of using NOC. employment data for land use planning is the inability to directly correlate occupations with the specific land use requirements of an industry. In contrast, NAICS. sectors like Manufacturing (NAICS 31-33) and Transportation and Warehousing (NAICS. 48-49) are inherently understood as Employment Lands Employment, as most jobs are accommodated in industrial-type buildings. Relying on NOC. could lead to an underestimation of Employment Area land demand, as the rise in high-skilled jobs in industrial operations might be mistakenly classified as office uses. Therefore, it is recommended that municipalities should use NAICS. data as the primary source for employment growth forecasts, with NOC data serving as a supplementary tool. NOC data could be a valuable source of information for economic development strategies where municipalities seek to identify and address local workforce gaps.

Land Needs Assessment

Recommendation 15: The PMG should provide greater clarity regarding the level of detail needed to translate forecast housing needs by unit type into net residential land area when preparing a LNA.

Chapter 5 of the proposed PMG offers three distinct methods for conducting a Community Area LNA to determine the land required for housing and jobs. It is recognized that Community Land Need is sensitive to the results of the housing needs forecast by structure type established in Chapter 3 of the proposed PMG document.

The PMG would benefit by providing greater clarity regarding the level of detail needed to translate forecast housing needs by unit type into the net residential land area for the purpose of the LNA. More specifically, there is a lack of guidance for situations where a shortfall of low-density housing units coexists with a surplus of medium-density and/or high-density units. It is assumed under Methods 1 and 3 that the housing needs are blended (i.e., low-density, medium-density, or high-density units), where the housing needs are calculated based on a net housing need (i.e., no differences in need by housing type). Method 2 utilizes multiple net residential density assumptions, as directed on page 45 of the document. This approach applies different densities to specific housing needs by housing unit types, such as low-density, medium-density, or high-density housing, but does not explain how mismatches in supply and demand between housing density types are to be addressed when assessing urban land needs.

4. Embracing Technology in the Preparation, Implementation and Monitoring of Growth Analysis and Urban Land Need Assessments

Recommendation 16: MMAH should assume a leadership role encouraging the use of technology to improve systems and processes regarding long-range growth analysis and urban land need assessments

The proposed PMG represents a positive step for Ontario municipalities to develop a more consistent and standardized approach not only related to growth analysis and land methodology but also with respect to data management practices and the use of shared data and technology. It is noted that some Ontario municipalities have started to develop growth management software tools to spatially monitor, test, and report on demographic and development trends as well as urban land supply (which is encouraging), however, continued effort is required in this regard.

It is recognized that as demographic conditions and development trends continue to evolve across Ontario, growth analysis and land need assessments must remain responsive and adaptive as conditions change. Given the increasing pace of demographic change and economic disruption there is a risk that the growth analysis and land needs assumptions and corresponding results that inform OPs may become outdated prior to their scheduled five to 10-year update.

Accordingly, regular monitoring is critical for municipalities, working with their public and private sector stakeholders, to identify early in the process potential variations in recent

development trends against the results of growth analysis and land needs assessments. Leveraging data-driven systems and GIS-based technologies can make this process more efficient and transparent, supporting municipalities in testing growth and land needs scenarios, tracking development activity, and aligning their long-range planning with real-time growth conditions. Ultimately, this will allow municipalities, and all relevant stakeholders increased ability to adjust planning direction and policies as well as corresponding infrastructure plans before significant gaps emerge.

It is recognized that there are opportunities to significantly enhance traditional spreadsheet-based growth tracking files through the use of automated, web-based growth management systems. The use of such technology should be encouraged by MMAH provided that there is a review of inputs and cross-checking of outputs from technical experts with strong industry knowledge related to demographics, land economics and urban planning.

It is our recommendation that with MMAH assuming a leadership role, further direction and support is provided by the Province to encourage the development of technology-driven tools which would facilitate the ongoing maintenance of the critical datasets developed through the requirements of the PMG. Enhanced growth management and monitoring systems offer the potential to provide a clearer understanding of recent growth trends across a municipality and to provide insights into the potential broad-ranging impacts of urban growth. Ultimately, such tools would generate greater efficiencies within municipalities when responding to changes in real estate market conditions, development pressures, and provincial planning policy direction.

5. Processes to Improve Implementation and Monitoring

Recommendation 17: MMAH should consider approaches to share knowledge between Ontario municipalities with respect to the technical approaches and processes used to execute and implement the PMG.

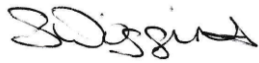
Chapter 6 of the proposed PMG emphasizes the need for collaboration between lower-tier, single-tier, or upper-tier municipalities, as well as with other orders of government, agencies, boards, and Service Managers to achieve the outcomes at all steps of the forecasting and L.N.A. process and ultimately implement the relevant PPS (2024) policies.

It is recommended that lower-tier municipalities within two-tier municipal structures, as well as separated single-tier municipalities and Counties within CDs, establish a growth management framework that provides coordination between municipalities when establishing long-range population projections and assessing urban land needs. A key objective of this framework should be to provide leadership and direction with respect to inter-jurisdictional coordination and monitoring of long-range growth projections, land use planning, and development phasing with the delivery of public infrastructure and municipal services.

These recommendations present OPPI's specific comments for the Ministry's consideration as it seeks to update the PMG. OPPI would be pleased to continue engagement with MMAH officials on this initiative.

If you and/or your staff have any questions on our submission, please feel free to contact me at 647-326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Wiggins".

Susan Wiggins, CAE, Hon IDC
Executive Director
Ontario Professional Planners Institute