

April 29, 2026

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

Minister Flack

Re. County of Dufferin Response to the Ministry of Municipal Affairs and Housing Proposed Draft Projection Methodology Guideline to Support the Implementation of the Provincial Planning Statement, 2024.

On behalf of the County of Dufferin, staff is pleased to provide written comments pertaining to the further revised draft projection methodology guideline ('PMG') that were prepared by the Ministry of Municipal Affairs and Housing ('MMAH'). It is our belief that the following comments will assist the MMAH in refining the recently revised draft PMG that are aimed at assisting in the implementation of the Provincial Planning Statement, 2024 ('PPS, 2024').

In our review of the Environmental Registry of Ontario ('ERO') No. 026-0304 posting, it is understood that the most notable changes to the draft PMG include the following:

- Providing increased clarity on when to consider undertaking population and employment forecast updates, which Ontario Population Projection data to use and how to set the planning horizon.
- Providing more details on assessing housing needs by considering housing tenure, housing type and propensities for households to occupy certain types of housing, and making adjustments such as to reflect market demand, housing affordability and suppressed household formation.
- Providing clarity on estimating feasible intensification rates when determining the amount and type of housing units that can be accommodated through intensification in the built-up area.
- Streamlining the land needs assessment methods for greater consistency among most municipalities, while continuing to allow a simplified method that is less data-intensive with clearer recommendations on which municipalities may use it.



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The County of Dufferin wants to first extend its appreciation to the MMAH for offering greater clarification and guidance on how to approach the implementation of forecasts and providing additional flexibility where necessary. Municipalities new directive to utilize Ministry of Finance ('MOF') projections brings forth significant challenges in terms of the updating of official plans. This challenge is even more pronounced for smaller, more rural-based municipalities that have less financial and staff resource flexibility compared to larger, fast-growing municipalities. The PMG's openness to allow for municipalities in the Greater Golden Horseshoe ('GGH') to utilize until such time that an update to align with MOF projections can be completed is notably appreciated. In addition, the enhanced guidance pertaining to how to interpret the methodologies and also considerations for implementation is greatly welcomed. This additional clarification will only allow for a more efficient transition for municipalities to the new projection methodology.

Through our review of the revisions to the draft PMG, there were no significant concerns with what was being proposed. Where questions did exist is with the revisions being proposed to the land needs assessment methodologies, especially as it relates to the removal of the "people and jobs per hectare" approach to land needs assessment. This methodology was initially brought forth in the first iteration of the draft PMG and was deemed, alongside the "multiple densities" method, as appropriate for most municipalities. While we can appreciate the MMAH's desire to create greater consistency in terms of land needs evaluation across municipalities, the removal of a methodology once determined to be "appropriate for most municipalities" seems questionable. It is our belief that the MMAH should not limit the methodologies available to municipalities to just two, and, in fact, should reincorporate the "people and jobs per hectare" approach into the PMG. This will offer municipalities greater flexibility in determining the most suitable approach to be taken when engaging in a land needs assessment.

The County of Dufferin appreciates the opportunity to provide comments on the revised draft projection methodology guideline. We also want to note our appreciation to the Province of Ontario, but specifically the MMAH in their work to create clarity on how municipalities should be implementing projections regarding population, employment, housing, and intensification. It is our hope that the comments provided above will assist the MMAH in further refining the proposed PMG aimed at supporting the implementation of the PPS, 2024.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'LM'.

Liam Morgan, MCIP, RPP
Acting Planning Manager
Phone: 519-941-2816 Ext. 2511
lmorgan@dufferincounty.ca

