

Appendix A – City of Markham Comment Table (PMG Consultation)

Section of Guideline	Department/Division	Proposal/Provision	Department Comment	Staff Recommendation
Overall Methodology	Development Services Policy and Research	Guideline repeatedly states municipalities “may” apply certain methods, or “could” choose between approaches (e.g., two projection methods, three land needs methods).	While flexibility is valuable, the current draft is overly ambiguous. The repeated use of “may” and “could” introduces uncertainty and creates the potential for inconsistent application across Ontario. This undermines the stated goal of creating a standardized methodology.	Request that the Province provide clearer direction and minimum standards (e.g., standard adjustment factors, benchmarks, or ranges for intensification, affordability, and vacancy rates), while still allowing local refinements.
Population Projections	Development Services Policy and Research	Step 1 requires municipalities to disaggregate MOF Census Division projections to the municipal level, using Method A (population share) or Method B (growth share). Adjustments may be made if documented.	MOF forecasts are not designed for land use or infrastructure planning and do not incorporate regional policy, servicing, or economic development factors. The Ministry acknowledges this limitation in its own documentation. This undermines the reliability of MOF projections as a planning standard. The guideline is unclear on what data sources and statistics are to be used to undertake Step 1 and Step 2. Without clear direction, municipalities may use inconsistent sources, leading to non-comparable forecasts across Ontario.	Request that the Province allow municipalities to continue using, or at minimum cross-reference, regional forecasts (e.g., York Region MCR, Growth Plan legacy data) alongside MOF projections, so that planning assumptions align with servicing and infrastructure delivery. Staff recommend that all required data sources be clearly provided and accessible via a single provincial link (e.g., Ministry-maintained datasets), to ensure consistency and transparency in municipal application.
	Development Services Transportation	Municipalities may adjust forecasts outside the range, but must document rationale (e.g., infrastructure investment, immigration shifts, unique local conditions).	Population and housing assumptions influence travel demand, and variations across municipalities could create inconsistencies in cross-boundary transportation planning.	Request that the Province provide clear documentation of any adjustments to forecasts and ensure inter-municipal consistency to support reliable transportation planning.
Housing Needs Forecasts	Development Services Policy and Research	Step 2 requires municipalities to adjust household forecasts for affordability, suppressed household formation, vacancy rates, and contingencies. No formulas or standard factors are provided.	No methodology or benchmarks are provided for making these adjustments. Without consistent technical guidance, municipalities may apply these factors differently, leading to non-comparable outcomes across jurisdictions.	Request that the Province publish technical guidance and data sources for affordability and suppressed household formation adjustments to ensure consistent application across municipalities.
Employment Forecasts	Development Services Policy and Research	The PMG requires municipalities to forecast employment using a municipal activity rate (jobs / population), with jobs categorized into General Employment (GE), Employment Land Employment (ELE), and Rural Employment. The GE category is intended to capture employment outside of designated employment areas, including retail, institutional, and work-from-home.	The recognition of a General Employment category is a positive feature, as it acknowledges employment growth beyond traditional employment areas, including home-based work. The PMG also acknowledges work-from-home and commuting patterns, which reflects evolving employment trends. However, additional direction would be valuable to guide municipalities on projecting hybrid work models and to recognize the unique role of mixed-use centres (e.g., Markham Centre, Langstaff Gateway) as major employment nodes.	That the Province retain the General Employment category but provide further guidance on incorporating hybrid/remote work into long-term forecasts, and on how mixed-use centres should be reflected in employment forecasting.
Land Needs Assessment	Development Services Policy and Research	Land needs may be assessed using people/jobs per hectare, multiple densities, or a simplified method for smaller municipalities.	While multiple options provide flexibility, the reliance on assumed densities introduces risk. If municipalities adopt optimistic densities, land needs may be underestimated; conversely, conservative assumptions may inflate land demand.	Request that the Province provide benchmark density ranges for different housing and employment forms, while allowing local data to refine assumptions.
	Development Services Policy and Research, Natural Heritage	The Guideline provides three methods to determine land needs all of which utilize net and gross density/land areas in the calculations to arrive at the overall gross land need.	In the land needs assessment section, it is unclear what net and gross density, and land needs are referring to in each instance where these terms are used. While some explanation is provided, additional clarification, illustrations and glossary definitions for net density, gross density and developable area/lands would help facilitate better consistency across the province. Recommended approaches and/or list of adjustments to convert net to gross density as described in Method 2 should be provided in Method 1. When municipalities are adjusting land needs to determine gross land requirements the reference to “other components not accounted for” is unclear. The guidance should list the types of components that would be generally appropriate to include in the adjustment. While not specifically related to the determination of land needs, the Guideline could also include an explanation of additional exclusions that may need to be considered when designating land for settlement area expansions or new settlement areas after the gross land need is determined. Environmental exclusions, where provincial and official plan policies prohibit development, and major infrastructure (highway, railway and utility rights-of-way) are areas that are unavailable for development. These exclusions are highly variable in area and/or location specific and are not typically accounted for when converting net to gross land needs. The guideline could indicate that environmental and major infrastructure constraints be taken into account and excluded when designating new settlement areas or settlement expansions to ensure required gross land requirements are provided.	Request that the Province clarify and provide glossary definitions for net density, gross density and developable area/lands when determining gross land needs and clarify the components that would be generally appropriate to include when adjusting net to gross land needs.
Implementation & Coordination	Development Services Policy and Research	The PMG emphasizes the importance of documenting assumptions, collaborating across	While the guideline stresses collaboration, it does not provide direction on how upper- and lower-tier municipalities should reconcile differences if they arise.	That the Province retain the requirements for inter-municipal coordination and transparent documentation, provide additional guidance on how upper-

Section of Guideline	Department/Division	Proposal/Provision	Department Comment	Staff Recommendation
		jurisdictions, and integrating projections and land needs into municipal Official Plans. Municipalities are directed to coordinate with upper-tier and lower-tier partners to ensure consistent approaches and to clearly identify all data sources and assumptions used.		and lower-tier municipalities should reconcile forecasts to ensure consistency across regions.
Other Comments	Development Services Transportation		All key elements proposed, including population projections, housing needs, employment forecasts, and land need assessments, will have a significant impact on travel demand and patterns. These assumptions directly shape the scale, timing, and type of infrastructure required to support growth.	Request that the Province require transportation system capacity analysis when determining growth allocations, to confirm the viability of the proposed forecasts. Further request that transportation system sensitivity analysis be incorporated into the development of growth forecasts, so that transportation capacity informs forecast assumptions rather than being assessed afterwards.

Note – Provincial Discussion Questions:

The Province has included the following questions to guide municipal feedback on the proposed Projection Methodology Guideline. Departments may wish to provide responses to these questions in addition to the comments entered above.

1. What are your thoughts on the approach in the guidance:
 - a) to developing municipal level population growth forecasts to the planning horizon based on Ministry of Finance population projections as required by policy?
 - b) to identifying the amount of housing required to accommodate forecast population growth to the planning horizon?
 - c) to identifying the amount and type of employment growth to the planning horizon?
 - d) to determining the amount of land needed to accommodate forecasted population and employment growth to the planning horizon?
2. Are there additional resources, tools, or information that you think would be helpful to support implementing the guidance?