

Appendix M

April 29, 2026

Environmental Registry of Ontario
Ministry of Municipal Affairs and Housing
777 Bay Street
Toronto, ON M7A 2J3

Subject - Draft Projection Methodology Guideline (PMG) to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)
[ERO Posting 026-0304](#)

Dear Sir/Madam,

Thank you for the opportunity to comment on the further revised draft Projection Methodology Guideline, which incorporates several welcome refinements and clarifications. The methodology, once finalized, will provide needed direction to the City of Brampton and other municipalities on forecasting population and employment growth as well as determining future land needs. As a municipality with settlement area boundaries that are coterminous with its municipal boundaries, Brampton would not require the methodology for determining the need for settlement area boundary expansions, but it would play a critical role in ensuring sufficient employment lands remain available to support the growth of the City's economy and provide ample job opportunities for a fast-growing population.

In Chapter 4 of the draft methodology, the municipality's activity rate is to be used for forecasting employment by applying it to the projected population from a previous step. The City has some concerns with this approach as Brampton's current activity rate is known to reflect an undersupply of job opportunities for its resident population, a situation which both the complete communities policies of the Provincial Planning Statement, 2024 and the economic development policies of the City's Official Plan, Brampton Plan, require the City to address through land use planning. While the draft methodology does outline some circumstances in which it is appropriate for the municipality to further refine its activity rate, it would be beneficial to also specifically recognize scenarios where the use of the historic rate could result in undesirable economic outcomes and be unaligned with provincial and municipal land use policy. The City has a clearly stated objective of achieving an activity rate of 40%. Brampton Plan

states, “3.6.1.3 In alignment with the goals, objectives and policies of this Plan, an activity rate of 40% will be monitored and reported through the Growth Management Program (Section 5.1) to support a robust jobs to population ratio in Brampton.” As Brampton has continually had a low population-to-jobs ratio, planning for a healthier activity rate is critical to achieve Brampton’s city building objectives.

Thank you for the opportunity to provide comments on the proposed methodology.

Sincerely,

Steve Ganesh, MCIP, RPP

Commissioner

Planning, Building and Growth Management

City of Brampton