

October 10, 2025

Provincial Land Use Plans Branch
13th Flr, 777 Bay St
Toronto, ON
M7A 2J3

Submitted via email to growthplanning@ontario.ca

To the Provincial Land Use Plans Branch,

Re: ERO # 025-0844, Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation of ERO 025-0844. Our feedback is summarized below:

- The inclusion of a simplified methodology is well-received by OFA;
- The 30-year planning horizon and the area of farmland predicted to be lost in that time showcases the importance of establishing fixed urban boundaries;
- Frequent mention of intensification in the guideline is appropriate and appreciated;
- The wording of Chapter 3, Step 3, should be clarified by stating that prime agricultural areas are not “available” for urban development;
- The guideline should counsel that market trends are not synonymous with needs;
- Subtracting rural figures from land need forecasts is appropriate, but it should be noted that many farmers work both on the farm and in urban settings;
- Housing affordability should be further emphasized in the guideline;
- The guideline would be improved by referencing Provincial Planning Statement (PPS) policies that require agricultural impact assessments; and
- OFA supports “transparency” as a principle of the guideline.

Introduction

The Ontario Federation of Agriculture is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. The Ontario Federation of Agriculture is dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with on issues, legislation and regulations that would impact the sustainability and growth of our farm businesses. OFA welcomes the opportunity to discuss the *Projection Methodology Guideline* and the province’s attention to an important resource used to manage growth and plan strategically.

Municipal level population growth forecasts to the planning horizon

OFA applauds the inclusion of a simplified methodology (Method 3) for use by small, remote, and northern municipalities. This alternative methodology helps municipalities meet the expectations of the Ministry of Municipal Affairs and Housing (MMAH) while not straining limited resources.

OFA is aware that urban expansion is usually at the expense of farmland. The expansion of settlement and employment areas into prime agricultural areas remains a key concern for OFA. If municipalities are to forecast land needs 30 years into the future, we should consider farmland in the same time frame. Using the provincial average rate of farmland loss since 1996, Ontario is projected to lose 2,500,000 acres of farmland by 2055, representing 21.6% of the total farmland area reported in the 2021 Census of Agriculture. Over the coming 30 years, this large area of land will mostly be taken from the peri-urban agricultural areas that surround Ontario's cities. Farmers in these areas will be subjected to strong pressure to sell their properties to developers and land value speculators. This will further add to the growing cost of farmland which already outpaces the rate of inflation. These issues highlight both the need to act and the shortcomings of a 30-year planning horizon, and are why OFA continues to recommend fixed urban boundaries and high density and intensification targets.

Ontario has privileged access to the best agricultural soils in the world, which are irrecoverable following conversion to settlement and employment areas, and therefore are protected by the PPS through prime agricultural area designations. **OFA recommends revising the wording of the proposed guideline in Chapter 3, Step 3, to make clear that prime agricultural areas are not freely “available” for urban development.**

Types of Growth

The proposed *Projection Methodology Guideline* takes many of the right steps, especially in its frequent reference to PPS intensification policies and density targets. But municipalities should be encouraged to surpass the minimums presented in the PPS. Those minimums are based on the densities needed to support public transit, as stated in the *Transit-Supportive Guidelines*, which is not a comprehensive planning manual.

The guidelines also recommend that municipalities consider “market demands” for different types of housing and jobs. Municipalities should be reminded that market preferences are not necessarily needs. Single-detached homes in Ontario are 55% bigger today than they were in the 1970s, despite the average Canadian family shrinking in size.

Identifying housing and employment land needs

OFA believes it is appropriate that rural employment figures are subtracted from the calculations used to determine employment land needs, as proposed in the draft guideline. It is important that agricultural employment statistics do not inflate the results of settlement and employment land needs forecasts. Relatedly, OFA notes that many farmers today are also employed off the farm, in part- and full-time capacities. Municipalities with a high proportion of farms should be careful not to skew housing and employment numbers because some residents are employed in both urban and rural settings.

Additional Resources and Comments

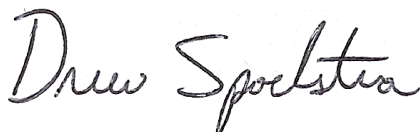
OFA supports the MMAH's inclusion of "transparency" as a guiding principle of the *Projection Methodology Guidelines*. It is through transparency in government that the ideals of good governance, planning, and public engagement are upheld. Towards increased transparency, OFA recommends that the *Projection Methodology Guideline* include reference to the *Agricultural Impact Assessment Guidelines*. The PPS now requires agricultural impact assessments for proposed settlement area expansions and non-agricultural land uses in prime agricultural areas.

OFA also recommends further emphasis be placed on housing affordability. Municipalities should be discouraged from permitting "rural manor estates" and strategies put into place to address Ontario's increasingly unaffordable housing market.

Concluding Remarks

OFA appreciates this opportunity to provide our feedback and perspectives on how the province and its municipalities plan for growth and forecast land needs. We look forward to working with the provincial government and our municipal counterparts to find policy solutions that support the agri-food sector and protect Ontario's agricultural system.

Sincerely,



Drew Spoelstra
President

cc: Hon. Rob Flack, Minister of Municipal Affairs and Housing;
Hon. Peter Bethlenfalvy, Minister of Finance;
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness;
Hon. Lisa M. Thompson, Minister of Rural Affairs; and
The OFA Board of Directors

This submission has been approved by the OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>