

May 14, 2026

Growth Planning
Provincial Land Use Plans Branch
Ministry of Municipal Affairs and Housing
13th Floor, 777 Bay Street
Toronto, ON. M7A 2J3

Submitted online and to GrowthPlanning@ontario.ca

To the Growth Planning Team,

Re: [ERO # 026-0304](#), Draft Projection Methodology Guideline (PMG) 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 continued opportunity to participate in the consultation process for proposed changes to the *Projection Methodology Guideline* (PMG) under ERO # 025-0304. OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA 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. Our feedback is summarized as follows:

- OFA supports the intensification of *settlement areas* and the draft PMG's frequent mention of intensification and density targets;
- OFA also supports the inclusion of a simplified method for small and rural municipalities;
- Because the PMG is not intended to endorse the location of prospective settlement area expansions, the PMG should not recommend considering the "availability" of prime agricultural areas when addressing estimated housing needs outside the built-up area; the draft PMG recommendation also does not consider the PPS policy structure that mandates a hierarchy of land protection;
- Where the PMG encourages the consideration of economic and climate change impacts, municipalities should be reminded of the contributions made by farmers and farmland towards those goals and consider how housing, employment forecasts, and their land needs affect agricultural systems and the agri-food sector.

OFA supports the intensification of Ontario's urban settlement and built-up areas. The prosperity of Ontario's agricultural system relies on policies that redirect non-agricultural uses and developments into appropriate areas, away from the countryside. The PMG is one of many policy instruments that informs such municipal planning decisions. Accordingly, OFA supports the draft PMG's frequent mention of intensification and density targets. Municipalities should be

encouraged to use urban density and intensification as tools that supports efficient, compact, built-up areas that capitalize on existing infrastructure investments.

OFA continues to support the inclusion of a simplified method in the PMG, which is important for empowering small and rural municipalities to remain autonomous and direct local policies. OFA recommends special attention be given to comments submitted to this ERO consultation by small and rural municipalities to ensure the alternative methodology's requirements are commensurate with municipal capacities.

The MMAH comments through ERO # 026-0304 that “the proposed guidance is not intended to address the location of new settlement areas, the location of expansions to settlement areas, the location of employment areas, or the suitability of whether a particular area of land should be included or removed from an employment area. These matters are to be addressed through other relevant policies.” However, on pages 24-25, the draft PMG’s “recommended approach” states (emphasis added):

To estimate housing needs outside the built-up area, municipalities should subtract the amount of housing that can be accommodated through intensification (according to their intensification targets) from the total forecasted housing needs.

The municipality’s intensification targets should be set to reflect municipal objectives, local conditions, and various forms of intensification, such as (but not limited to):

- [...] **availability and viability of surrounding prime agricultural areas; and**

The draft PMG is endorsing a recommended approach that includes considering specific locations to fulfill “housing needs outside the built-up area.” The draft PMG lists prime agricultural areas as a potential place for housing development. Because the PMG is not intended to endorse the location of prospective settlement area expansions, the PMG should not recommend considering the “availability” of prime agricultural areas for housing needs.

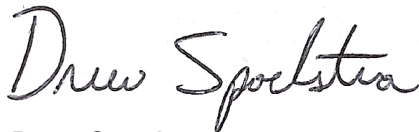
If this section of the PMG must retain recommendations for the siting of housing needs outside the built-up area, then it should take the PPS into account. The PPS protects prime agricultural areas “for long-term use for agriculture” (PPS, 2024, Policy 4.3.1.2) and establishes a hierarchy of protection where specialty crop areas are given the highest level of protection, followed by prime agricultural areas, followed by rural lands (PPS, 2024, Policy 4.3.1.3). The PMG does not mention rural lands (ie. non-prime soil areas) in this context, even though they are afforded the lowest protection under this policy. These policy concerns could also be incorporated into the Policy Context discussion in Chapter 1, but OFA recommends they be presented alongside where the draft PMG comments on housing needs outside the built-up area.

Throughout the draft PMG, the document also frequently mentions economic concerns and climate change issues. Ontario’s agricultural systems are also an economic concern that merits additional comment in the draft PMG. At a time when global trade instability has highlighted how

quickly fuel prices are passed on to consumers, particularly regarding imported food products, protecting farmland also protects Ontarians through strengthening food security. Ontario's agri-food sector is also recession resilient, as it delivers essential goods to market, and employs an impressive one in nine Ontarians and contributes \$51.4 billion to the provincial economy. Therefore, municipal land needs projections should be informed by the land needs of the agri-food sector from an economic perspective, in addition to the protective policies listed above.

OFA appreciates this new 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;
OFA Board of Directors.

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