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LONG-TERM THINKING FOR TODAY'S ISSUES

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Sandra Bickford  
Acting Director  
Growth Management Strategic Policy, Innovation and Partnerships Branch  
Ontario Growth Secretariat  
Ministry of Municipal Affairs and Housing  
College Park, 23 Floor, Suite 2304  
777 Bay Street  
Toronto, ON M7A 2J3  
Via email: [sandra.bickford@ontario.ca](mailto:sandra.bickford@ontario.ca); [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca);

## Re: ERO 019-1679 Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe

Dear Sandra Bickford,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The Greater Golden Horseshoe (GGH) is a dynamic region of the province, particularly for the agri-food sector. As we expressed more fully in our letter to you regarding “ERO 019-1680 Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe,” we are concerned about the long-term protection of Ontario’s farmland, particularly in the Growth Plan region. The CFFO sees a significant role for agriculture in the region as part of ensuring ongoing food security and as aiding in economic recovery. Our productive farmland is the foundation of agri-food in Ontario. It requires strong protections from degradation and permanent loss to aggregate extraction and settlement expansion.

### Land Needs Assessment Methodology

We are currently in a time of significant flux. Patterns of social behaviour and doing business are changing. Where people will work and where they will live are likely to change, as well.

It is vital that the land needs assessment methodology allows for flexibility on the part of municipalities to adjust to changing realities. Municipalities must be allowed to assess both when they are in need of more land for community and employment areas, as well as when they have excess lands already allocated for these purposes that meet their current and projected needs.

Lower forecasts for population, dwellings by type, and employment must still be permitted in the land needs assessment process to ensure municipalities can adjust to changing reality. As stated in our letter regarding “ERO 019-1680 Proposed Amendment 1 to A Place to Grow,” we are concerned about government proposals to extend the planning horizon from 2041 to 2051 and to prevent municipalities

from ever adjusting forecasts *lower* than those established in the Growth Plan. These changes are likely to drive population and employment projections higher than necessary, which puts productive farmland and the agri-food system directly at risk of speculation costs and permanent loss to settlement expansion.

Farmland is further threatened by proposed changes to the Land Needs Assessment Methodology that also forbid lower forecasts. For example, the requirement that municipalities “maintain the ability to accommodate residential growth for a minimum of 15 years” will mean municipalities will be driven to allocate more land than necessary and have no mechanism to make corrections for excess lands should projections or needs changes in the future.

Analysis of the impact of growth planning projections within the region to date indicate that in most municipalities, growth and job projections from the *Growth Plan* have been too high.<sup>1</sup> This means that more land than necessary has *already* been allocated for development through the current Municipal Comprehensive Review process. Therefore, the Land Needs Assessment Methodology must enable municipalities to make corrections and lower forecasts.

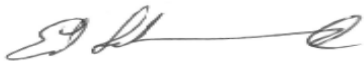
It is important that our limited prime agricultural land is protected and dedicated to food production, especially in areas where development pressure is high. Farmland has important economic and environmental benefits that need to be respected and protected, similar to other natural features.

## Conclusion

The CFFO wants to see strong protections on our productive agricultural land through growth planning and the land needs assessment process. Productive farmland is the foundation of Ontario’s agri-food industry, which has the potential to be a significant driver for economic recovery and greater food security in the province. The Land Needs Assessment Methodology must allow for flexibility for municipalities to adjust to lower forecasts and excess land allocations.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario

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<sup>1</sup> Kevin Eby, “Population Forecasting in the GGH: A Comparison of the *Growth Plan* Population Forecasts and the Ministry of Finance Population Projections.” Friends of the Greenbelt Foundation. March 26, 2020.