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LONG-TERM THINKING FOR TODAY'S ISSUES

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September 21, 2021

Ministry of Municipal Affairs and Housing  
College Park, 23 Floor, Suite 2304  
777 Bay Street  
Toronto, ON M7A 2J3  
Via email: [planningconsultation@ontario.ca](mailto:planningconsultation@ontario.ca)

## Re: ERO 019-2346 A Proposed Approach to Update the Projection Methodology Guideline

Dear Planning Consultation Staff,

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.

Having a single Projection Methodology Guideline for the whole province outside to the Greater Golden Horseshoe area includes a very diverse range of regions with very different characteristics. From an agricultural perspective, some areas of prime agricultural land surrounding large settlement areas like London or Ottawa experience significant development pressure, while many rural settlements are looking to expand economic development opportunities. Some regions of the province have significant seasonal populations of farm workers, while other areas with different types of farming will not experience this seasonal population shift and the accompanying housing needs.

The CFFO has several recommendations relating to agriculture for consideration in updating the Projection Methodology Guidelines:

- **All prime agricultural areas in Ontario should be given Greenbelt-type protections in land use policy, ensuring that settlement area boundaries cannot encroach on these lands.**
- **Seasonal agricultural workers and their particular housing needs should be considered in population and housing projections in those regions where labour-dependent farming commodities are common.**
- **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 sufficient or even excess lands already allocated.**
- **Land use planning in rural areas must continue to balance growth and development with protection of vital rural resources such as productive farmland.**
- **A simpler methodology for municipalities below a designated size and outside a required distance from a larger settlement area is appropriate.**
- **The provincial government should identify and map prime agricultural areas across the province, beginning with those counties outside the GGH which have the highest quality farmland in proximity to large settlements.**

- **The CFFO requests that the definition of “prime agricultural areas” outside of the GGH should be based on the top three classes of farmland within the region or county, which may include classes 4-7 farmland.**

## Protecting Farmland

All our farmland is a limited valuable resource. It provides a long-term renewable source of human sustenance and vital environmental goods and services. Productive farmland is also the foundation of Ontario’s agri-food industry, which, according to the government’s own numbers, “contributes \$7.6 billion to the GDP.”<sup>1</sup> The CFFO sees a significant role for agriculture as part of ensuring ongoing food security and as aiding in economic recovery for the province. Our productive farmland is the foundation of agri-food in Ontario. It requires strong protections from degradation and permanent loss to settlement expansion.

The CFFO is concerned about the long-term protection of our farmland, especially in regions of the province where the most productive farmland is also faced with significant development pressure, as is the case in many parts of the province beyond the GGH.

The Projection Methodology Guideline, published in 1995, holds certain unspoken assumptions in the entire method proposed. It assumes primacy of land use for housing and employment needs, while acknowledging the provincial interests to protect farmland and vital greenspaces. This overemphasis on the primacy of land use for housing and employment lands continues to come at the cost of significant loss of our farmland and greenspaces.

The current Provincial Policy Statement, 2020 does have provisions for the protection of farmland. However, there is no process required to calculate the food-production needs of the population and how these needs will be met now and in the future. Were such a calculation to be made, in the same vein that calculations for housing and employment needs are done, greater value would be placed on our current farmland. This would give a much better assessment of the value of our productive farmland, including the need to consider our provincial food security and the economic and environmental benefits this land provides. This is not empty land waiting to be converted to housing or employment land. These are working landscapes, providing vital needs for Ontarians, contributing to our economy and the overall health of our environment.

**The CFFO reiterates our request that all prime agricultural areas in Ontario, as currently defined by OMAFRA<sup>2</sup>, should be given Greenbelt-type protections in land use policy, ensuring that settlement area boundaries cannot encroach on these lands.**

## Population Projections

One important temporary population in many of our rural areas are the seasonal farm workers who are present through the spring months to the harvest season. These workers may be temporary foreign workers or seasonal agricultural workers, arriving from overseas through federal farm worker programs, or they may be Ontario residents who migrate to the farm to do this vital seasonal work. These workers form a significant seasonal population in some regions of the province and require adequate housing, usually outside of settlement areas,

<sup>1</sup> [https://news.ontario.ca/opo/en/2020/07/ontario-provides-additional-support-for-farmers.html?utm\\_source=digest&utm\\_medium=email&utm\\_campaign=p](https://news.ontario.ca/opo/en/2020/07/ontario-provides-additional-support-for-farmers.html?utm_source=digest&utm_medium=email&utm_campaign=p) July 16, 2020

<sup>2</sup> <http://www.omafra.gov.on.ca/english/landuse/prime-ag-areas.htm>

while they are working on farms. Since the pandemic, farmers have found it even more challenging to ensure appropriate housing for this temporary population.

**Seasonal agricultural workers and their particular housing needs should be considered in population and housing projections in those regions where labour-dependent farming commodities are common.** This may include accounting for meeting this housing need within settled areas, or accounting for temporary or permanent housing on farms to accommodate these seasonal workers.

## Housing Need Projections

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 sufficient or even excess lands already allocated.**

## Employment Projections

It is clear that lockdowns across the province and around the globe have meant significant changes to where and how people work. As increased opportunities for working remotely or from home continue, this trend has to be given significant attention for future impacts on employment land needs projections and on planning appropriately for employment within and outside of settled areas. This may impact where people will choose to live as well.

Where rural settlements are able to provide good internet connection, among other amenities and services, there may be significant opportunities for expanded economic development. There is a clear interest for many people to move away from large city centres into smaller settlements. This may prove to be a welcome trend in revitalizing rural towns and associated institutions.

**The CFFO strongly supports policies that will help economic development in rural settlements. However, land use planning in these rural areas must continue to balance growth and development with protection of vital rural resources such as productive farmland.**

## Simpler Methodology

**The CFFO supports a simpler methodology for municipalities below a designated size and outside a required distance from a larger settlement area.** The appropriate size and distance may need to be updated from the recommendations in the 1995 document.

## Rural, Agricultural and Northern Municipalities

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.

The primary focus of the Projection Methodology Guideline is to guide land needs calculations. However, the guide mentions several times that these calculations occur within a broader policy context, including what is now the “Provincial Policy Statement, 2020,” which gives guidance on other provincial interests such as protecting farmland and key greenspaces.

Within the GGH region, the province has undertaken a process to define, identify and map prime agricultural areas. This ensures that a consistent definition is being applied in all municipalities across the region, and that policies intended to apply to prime agricultural areas will be fairly applied.

**The CFFO requests that the provincial government should identify and map prime agricultural areas across the province, beginning with those counties outside the GGH which have the highest quality farmland in proximity to large settlements.** This will ensure that provincial interests of protecting farmland are appropriately and fairly applied in all municipalities.

It is not only our highest classes of farmland that deserve protection. All arable land has the capacity to produce food. Classes 4-7 land are often ideal for livestock production and can be improved for crop production through good stewardship. Microclimates for growing particular crops are found in different regions of the province beyond those currently defined as specialty crop areas. The CFFO has long argued for the importance of continued protection of the highest quality farmland by region, even where that farmland may be defined as class 4 or lower. This helps to preserve the local food-producing capacity of each region and to preserve our overall food security as a province.

**The CFFO requests that the definition of “prime agricultural areas” outside of the GGH should be based on the top three classes of farmland within the region or county, which may include classes 4-7 farmland.**

## Other Considerations

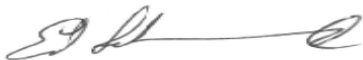
The CFFO supports the current recommendations in the guideline not to extend the planning horizon beyond 20 years with the overall goal to “have an adequate supply of land for the shorter term while being careful not to designate an excess supply for the long term” (pg. 6). Longer planning horizons are more likely to be inaccurate and can result in setting aside land for development unnecessarily. The CFFO also strongly encourages that municipalities outside of the GGH should not be required to keep a supply of land for development beyond a 10-year horizon.

## Conclusion

The CFFO emphasizes the importance of protection of farmland and the vitality of farm businesses through the projection methodology process. We highlighted the importance of mapping and protecting prime agricultural areas across the province, promotion of economic development opportunities in rural areas, and the importance of considering seasonal populations of farm workers and their particular housing needs. Remember that farmland, once lost, is lost forever.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario